

CODE OF CONDUCT

Welcome to the Natural Energy Family

Dear Colleagues,

With the awareness that our most important resource is our human resources, we aim to have employees with high motivation and efficiency and prioritize investing in "human resources".

We do not discriminate or grant privileges among our employees due to differences in language, race, gender, religion, ethnic and cultural origin.

All employees are considered within the principle of equality.

This guide is intended to assist employees in the daily application of natural principles.

Welcome to .

Bora BİLGİN
GENERAL MANAGER

OUR VALUES

Our values that we take as the main reference in our way of doing business:

Being friendly with the environment

By using modern technology, protecting the natural resources in the environment, world-class environmentally friendly production is an indicator of the value we attach to quality rather than quantity.

Creating added value with corporate social responsibility projects

Carrying out many social responsibility projects in cooperation with various institutions, organizations and non-governmental organizations in all areas of our country and providing added value to the region and society through these projects is an expression of the value and respect we attach to the society we are a part of.

Working with a team approach

Our employees and the employees of the sub-companies that do business with us are members of the family. It is essential to keep team awareness in the forefront and to adopt the sharing of all achievements as a team.

Continuous improvement

We get our strength from our competent and successful human resources. Being a dynamic and constantly developing organization by offering all necessary and possible development opportunities to our employees and improving our working conditions is our biggest basis for achieving our corporate goals.

Adherence to universal ethical values

Compliance with laws, human rights and business ethics in all our practices is one of the indispensable values of our honest and human-oriented management.

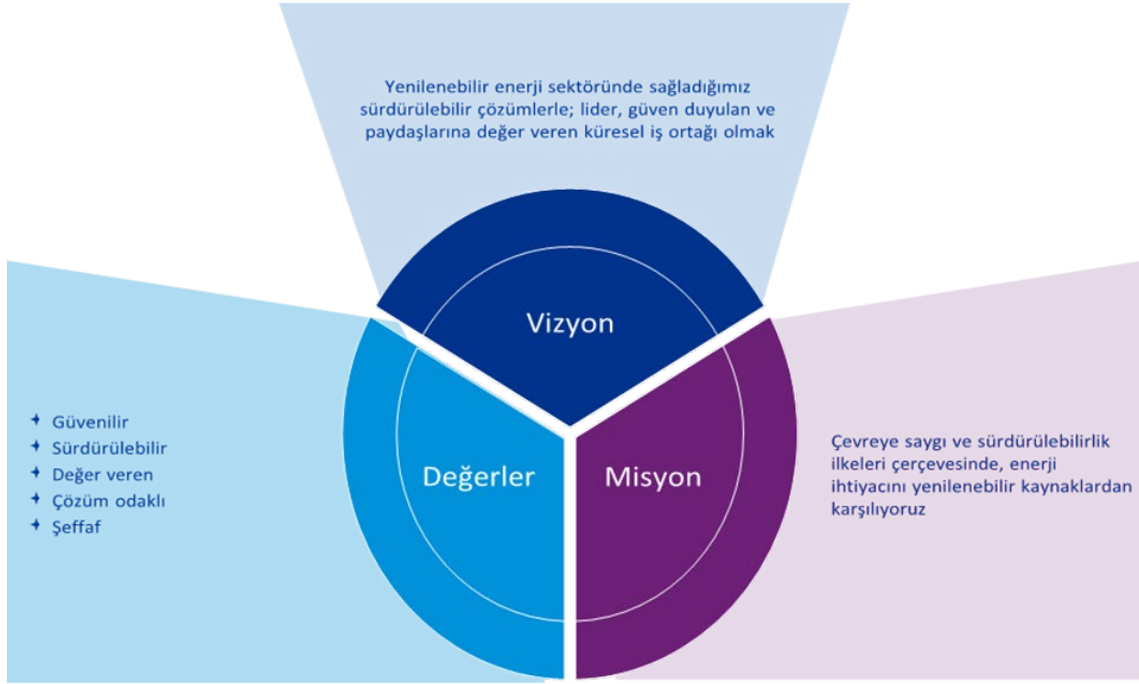
MISSION AND VISION

OUR MISSION

Meeting energy needs from renewable energy sources within the framework of respect for the environment and sustainability principles

OUR VISION

To be a global business partner who is leader, trusted and values its stakeholders with the sustainable solutions we provide in the renewable energy sector.



RULES:

1- Acting in accordance with the Law and Protecting the Reputation of the Organization

Each employee;

- He/she has to comply with the laws and avoid all kinds of activities that will put the organization he/she works in a difficult situation and damage his/her reputation.
- It is obliged to comply with the labor law legislation, the policies , instructions and manuals that are annexed to the labor contract and the labor conditions determined, the written and verbal instructions given by the employer regarding the execution of the work and its behavior in the workplace, the work discipline, occupational health and safety, the efficient use of energy and natural resources and the relevant rules regarding the environmental protection policies.

2- Creating a Working Environment where Violence, Discrimination and Harassment Are Not Accepted and Differences Are Included

- No type of harassment and bullying is tolerated within our group.
- Discrimination based on factors such as race, color, gender, religion, sect, marital status, sexual orientation, sexual identity, political opinion or belonging, ethnic identity, health status, family responsibilities, domestic violence, economic status, trade union activity or membership, physical disability or age is absolutely unacceptable in all human resources processes and in the business relationship.

- Our employees are expected to support diversity, which is an institutional richness, and to oppose all kinds of discriminatory behaviors.
 - Employees who report or oppose discrimination, harassment or aggression to themselves or others in good faith will not be penalized or subjected to any negative behavior.
 - Domestic violence can endanger the safety of employees in the work environment. Therefore, if such a situation is encountered, appropriate options to help solve performance and/or security problems are evaluated by considering the situation of the employee in our group in all aspects.
 - It is absolutely unacceptable for our employees to use their workplace resources to threaten domestic violence and/or practice.

SOURCE: Natural Energy Ethical Principles

3- Protecting the Value, Asset and Confidential Information of the Organization

Each employee;

- It is obliged to protect all kinds of money, tools and equipment and all kinds of records, documents and correspondences (including e-mails) related to the organization it works with, to ensure their security and not to use them for special requirements.
- It is obliged to keep all non-public information it learns about its duty confidential.

4- Showing Care in Relations with Third Parties

Every employee should take care to choose people who have a reputation in their direct or indirect relationship with third parties and who will adopt and apply our group's business ethics and code of conduct.

5- Acting in accordance with the Principles of Conflict of Interest

Each employee is obliged to act in accordance with the principles of conflict of interest specified in the Ethical Principles.

6-Protecting Personal Data

The privacy and personal space of our employees, business partners and customers must be respected. Even if personal information is recorded in accordance with the law, it cannot be obtained, shared and disseminated to third parties without the written permission and knowledge of the owners, except for legal obligation.

Each employee;

- Should know what personal data he/she processes and stores and discloses to the data processing within the area of duty and responsibilities and ensure their confidentiality.
- Be aware of personal data obtained, processed or stored in his/her work area.

SOURCE: IT DATA SECURITY INSTRUCTIONS

7- Reporting Personal Information and Changes

Our employees are expected to inform the human resources in their organizations about the changes in their personal information kept in accordance with the legislation related to our group.

In this context, each employee is responsible for notifying and giving the personal information (marital status, address, etc.) taken as a basis in terms of the rights and obligations regulated by the contract and regulations and the documents that are the basis of them to the human resources in their organization in a timely manner. In the notifications to be made by the

organization management, the notification address is the last address notified by the person and the notifications made to this address are deemed to have been made to him.

8- Reporting Those Who Act Against the Principles

It is the primary responsibility of each employee to notify the disciplinary board as soon as possible of situations that are considered to be contrary to the principles of business ethics, principles of conflict of interest and codes of conduct in general.

SOURCE:Natural Energy Human Resources Policy,Natural Energy Ethical Principles

9- Relations with Suppliers (Product/Service Provider Third Parties)

People who provide us with products/services, such as our suppliers, dealers and consultants, play a very important role in providing quality products/services to our customers. For this reason, we always take care to conduct our relations with suppliers in accordance with the principles of transparency, mutual trust, professionalism and efficiency.

In our relations with suppliers, we need to act according to the following basic principles in particular.

- Identify suppliers according to objective criteria. The price-quality balance of the product/service offered to us and past positive experiences are important selection criteria. However, these alone should not be sufficient in the selection of suppliers. When choosing our potential business partners, we should also look for qualifications such as the fact that these people have an honest, professional and good reputation in the market, and we should not work with people who do not provide these qualifications. In the selection of suppliers; we should also evaluate the environmental, ethical, occupational health and safety policies and the criteria for compliance with our sustainable environmental approach.

- Not to enter into any situation that will create a conflict of interest with the suppliers. We must not enter into a personal business relationship with our suppliers through themselves or their relatives, or provide any benefit to them or derive any benefit from them. When you identify such a conflict of interest, you should report the situation to the disciplinary board as soon as possible by the method specified here.
- To ensure that suppliers comply with the code of conduct. It is not enough for our employees to comply with the rules of conduct. At the same time, our business partners are required to comply with the rules of conduct of our group. For this purpose, it **should be ensured that suppliers make a commitment in their contracts that they will comply with the rules of conduct, and the working relationship should not be initiated without signing this commitment.**
- Protecting suppliers' confidential information and intellectual property rights. We should not use undisclosed information about the people we do business with for purposes other than those required by the business and should not share it with third parties without permission.
- Working conditions with suppliers (price, maturity and similar commercial conditions) should be in line with market precedents and should be subject to written agreements as much as possible. If necessary, confidentiality agreements should also be signed by obtaining the opinion of the legal counsel.
- In our relations with suppliers, we must always act in accordance with the Natural Energy gift and invitation policy.

SOURCE: Natural Energy Gift and Hospitality Policy, Supply Chain Employee OHS Policy, Code of Conduct, Ethical Principles

10- Relations with Our Customers

As Energy, our mission is to ensure customer satisfaction at the highest level by prioritizing quality, speed, convenience, courtesy and respect, provided that we are fair, honest, reliable and professional towards our customers. In this context, the health , privacy and security of our customers' personal data are of great importance for Energy.

In order to fulfill this mission, we need to pay particular attention to the following basic principles in our relations with customers.

- No conflict of interest should be created with our customers, in particular, no personal business relationship should be entered into with them or their relatives, no benefit should be gained from them, or no action should be taken that could result in any benefit being obtained from them.
- Do not engage in unfair and misleading behaviors towards customers, and create an environment of stability and trust in customer relations.
- Within the framework of customer-oriented service approach, pre-sales and after-sales service tradition should be developed and maintained.
- In our relations with our customers, we must always act in accordance with the Energy personal data protection policy.
- In our relations with our customers, we must always act in accordance with the Natural Energy gift and invitation policy.

11-Public Relations

We always take the utmost care to act lawfully and transparently in our public relations.

As Energy employees, we should pay particular attention to the following basic principles when conducting our relations with public officials and public institutions.

- We must comply with all laws and regulations when conducting public relations, especially the public ethics legislation to which public officials are subject.
- Under no circumstances should we offer a public official a pecuniary or moral interest.
- We should ensure that people acting on behalf of our group, such as consultants and representatives, behave in the same way and we should take commitments in this regard in the agreements to be made.
- We must always act in accordance with the Natural Energy gift and invitation policy in our relations with the public.

12- Relations with Our Competitors and Compliance with Competition Legislation

As Natural Energy, our policy is based on free and fair competition. In this sense, we do not engage in illegal activities to gain advantage over our competitors. We comply with all applicable competition laws in the countries in which we operate and do business.

As employees, we should never, directly, indirectly or through intermediaries engage in the following activities.

- Except as permitted by law, agreements and concerted actions that prevent, distort, restrict or may have the effect of preventing competition should not be made.
- We should not exchange information with our domestic and foreign competitors about sensitive competitive information such as prices, discount rates, costs, distribution plans or enter into collaborations that will create joint concerted action on these issues.

- We should avoid all kinds of interviews and transactions that will lead to the above results in association meetings, professional associations meetings and similar meetings or other private or professional meetings and negotiations that we attend on behalf of our organization.
- We must not share goods, services, territories or customers with competitors.
- We must not make unfounded and misleading statements about our competitors or their products/services.
- If we are dominant in the market, we should not abuse our dominant position.
 - We must respect the intellectual property and copyrights and patents of our competitors.

Violations of competition laws may result in severe fines and, in some cases, imprisonment for both employees and their affiliates. Therefore, if you have doubts that any situation or action may cause competition problems, you should contact legal advice directly

13- Business Ethics – Abuse, Bribery and Corruption

We have a zero-tolerance policy against all forms of abuse, particularly bribery and corruption, taking advantage of relationships with public officials, and violating competition laws.

Corruption and gaining advantage by using relationships with public officials or breaching competition law exposes the suspects as well as the company to severe disciplinary sanctions in terms of both compensation and criminal liability under applicable laws and regulations, regardless of the country in which the abusive behavior occurred.

14- Intellectual Property and Confidential Information

Intellectual property and confidential information of Enerji organizations are valuable assets. Our employees are expected to take all appropriate measures to raise the value and protect the confidentiality of these assets as part of the duty of secrecy.

In this respect, our employees should protect the confidentiality of the innovation, invention or useful models or other intellectual rights of the organizations; they should keep their plans for the use of trade or service brands or any strategy related to copyrighted materials confidential. Each of us can access information about our products, working processes, human resources policies, customers, suppliers or competitors during our work. All kinds of information belonging to our group, except those that are publicly available, is considered confidential information and is subject to confidentiality.

When using our group's information to protect the rights of our group, we must always act in accordance with the following principles:

- The information we obtain should never be shared with third parties.
- Information should only be used to the extent necessary and for the purpose required.
- The information should not be shared with employees who do not need it for their job or with people outside our group, especially without a confidentiality agreement approved by legal counsel.

If the confidential information of the organizations is disclosed without permission, accidentally or intentionally, this should be reported to the legal counsel as soon as possible.

15- Responsibility for the Environment/Environmental Sustainability

As Enerji, we are aware that sustainable growth, which we place on the main axis of our activities, is possible as long as we maintain sustainable environmental and energy principles.

The sustainability of environmental factors of vital importance to both humans and other living beings is essential for the continuation of life on our planet.

In order to meet the need for economic development, the use of natural resources as if they would not be exhausted, the intervention of the living rights of other living beings for human development and the disruption of human factors and ecological balances in disaster dimensions are among the main issues that concern environmental sustainability.

The increasing energy requirement and the problems it raises raise the question of whether social welfare can be increased without reducing the amount and quality of energy consumed. Undoubtedly, if we do not change the way of production and consumption, a livable world cannot be left to future generations. Because the ecological balance is deteriorating, energy prices are increasing, income distribution is damaged, and fossil resources that provide energy are decreasing day by day.

For these reasons, energy efficiency is indispensable for sustainable development. Because all kinds of positive or negative developments related to energy affect the human and environmental factors that constitute the focal point of sustainable development.

Therefore, increasing productivity in the production and consumption phase rather than producing more and consuming unconsciously will make positive contributions in economic, social and environmental terms.

In this context, we aim;

- To use all resources efficiently, to increase recycling and recovery,
- To take the protection of the environment as a basis in the works carried out in the working areas,
- To take into account the technologies that provide energy efficiency and are environmentally friendly while creating all processes from the design stage,
- To develop land and hybrid solar power plants that will have a positive impact on climate change, which is our main field of activity, and to install them on a turnkey basis,
- To purchase products, services and technologies that provide energy efficiency,
- To carry out our turnkey SPP installation activities by applying Environmental and Energy Management Systems.
- We minimize water consumption as much as possible and our employees need to be informed and encouraged about this issue.

We want all our employees to act in line with these rules.

SOURCE: Environmental and Energy Policy, Environmental Safety Instruction, Recycling Applications

16-Disciplinary Practice

In the evaluation and decision process of suspected violations of the code of conduct, the compliance committee evaluates all the elements as a whole, including the intent or negligence of the employee, the past behavior and performance of the employee, the extent of the violation, whether it is repeated, the possible damage and cost to the reputation of our group, taking into account the characteristics of the concrete case and decides whether one of the penalties in the disciplinary regulation will be applied and if so, which of them will be applied and other measures it deems necessary to stop the violation, prevent it from recurring, and correct the consequences as much as possible.

SOURCE: Natural Discipline Regulation

Personnel

Name :
Surname

Signature :

Date :