

CORPORATE CODE OF CONDUCT

1. INTRODUCTION

The “Corporate Code of Conduct” covers the fundamental rules of conduct of Gesto Drum Motor Electric Industry Inc.

These principles include the values of Gesto Drum Motor Electric Inc. as well as legal and societal common values.

The aim of the “Corporate Code of Conduct” is to guide all our employees in their decisions and behaviors while performing their duties.

2. PRINCIPLES OF RELATIONS

The fundamental principles guiding the relations of Gesto Drum Motor Electric Industry Inc. with its stakeholders are listed below:

2.1 COMPLIANCE WITH LAWS AND LEGAL TRANSACTIONS

- Gesto Drum Motor Electric Industry Inc. adopts the principle of acting in accordance with all laws, rules, and regulations of the Republic of Turkey.
- All activities are conducted, recorded, and reported fully and properly in accordance with the law.
- Contracts with third parties and organizations are ensured to be legal, compliant with regulations and ethical rules, clear, and understandable.

2.2 CUSTOMER RELATIONS

- Provides high-quality products and services to fully meet customer demands and needs.
- Acts professionally and fairly within the framework of respect in customer relations.
- Protects customer information and its confidentiality in compliance with applicable laws.
- Does not provide false, misleading, or incomplete information to customers.

2.3 SUPPLIER RELATIONS

- Carefully selects suppliers and partner companies based on objective criteria.
- Strives to build long-term meaningful relationships with suppliers in line with quality, environmental performance, and sustainability goals.
- Ensures that these companies do not engage in unethical or unlawful practices, encourages them to respect human rights, comply with legal obligations, and adhere to anti-corruption, safety, and environmental protection principles.
- Complies with reasonable confidentiality and occupational safety rules during supplier and partner visits.

2.4 COMPETITOR AND COMPETITION RELATIONS

- Does not enter into agreements or engage in behaviors with competitors or other entities that aim to or may restrict competition outside the boundaries permitted by law.

- Does not abuse its dominant position alone or together with others in the market.
- Avoids meetings and information exchanges intended to determine market/competition conditions jointly with competitors.

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3. RESPONSIBILITY OF MANAGEMENT

Gesto Drum Motor Electric Industry Inc. is responsible for communicating the “Corporate Code of Conduct” to employees and ensuring its correct implementation.

Our fundamental principle is to provide a safe, healthy, respectful, and fair working environment.

- Recruitment and employment decisions are based solely on merit; equal opportunities are provided without discrimination (language, race, color, gender, political opinion, belief, religion, sect, age, disability, etc.).
- Equal opportunities are provided for development and promotion.
- Fair and competitive wage policies are established.
- No tolerance for bullying or harassment at the workplace.
- Confidential employee information is not shared without consent (unless legally required).
- Adheres to International Labour Organization (ILO) principles and respects fundamental human rights.

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4. RESPONSIBILITIES / CODE OF CONDUCT FOR EMPLOYEES

- All employees and third-party consultants are required to comply with company rules and protect the reputation of the company.
- Employees must act in compliance with laws, declared rules, and regulations as well as the “Corporate Code of Conduct”.
- Employees are expected to carry out their duties in an equal, transparent, accountable, and responsible manner.
- Must protect company assets and ensure efficient use. Company resources are to be used for business purposes only.
- Must not accept or give bribes or illicit gains; must act in accordance with anti-corruption rules.
- Confidentiality of financial, technical, legal, and competitive information must be maintained even after leaving the company.

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5. OCCUPATIONAL HEALTH AND SAFETY (OHS) APPROACH

Provides a safe workplace, protects employee health, and supports continuous improvement. Considers OHS a shared responsibility of all employees.

6. ENVIRONMENTAL APPROACH

Manages environmental impacts responsibly and supports environmentally friendly

technologies and awareness.

7. PRINCIPLES OF IMPLEMENTING THE RULES OF ETHICAL CONDUCT

Reviewed and updated when necessary by a board composed of the general manager, HR manager, and senior consultant. Ensures confidentiality and protection of employees reporting violations.

8. DISCIPLINARY PRACTICE

In case of violation of the “Corporate Code of Conduct”:

- If intentional misconduct is detected, termination and legal action may follow.
- If negligence or ignorance is the cause, a verbal or written warning will be applied according to the impact.