

# Ethics Policy

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Korozo Group is committed to conducting its activities in an ethical and honest way and in compliance with laws and international standards respecting human rights. Korozo Group's Ethics Policy is an extension of our culture of trust and integrity and a reflection of our commitment to ethical business practices and compliance with laws.

This policy serves as a guideline summarising ethical principles and practices expected from all employees, suppliers and business partners of Korozo Group.

This policy is reviewed annually and revised when necessary. All employees are responsible for the implementation of this policy, and the Human Resources Department, especially senior management, is responsible for its execution and oversight. Any violations of this policy will result in disciplinary action.

In accordance with this policy, Korozo Group:

## **Respect for Human Rights and Safety**

- Adopts an approach that respects human rights for all employees and business partners and aims to promote the exercise of fundamental human throughout the society.
- Provides a safe working environment that respects human dignity and fosters employee performance, development and engagement.

## **Fraud, Anti-bribery and Conflict of Interest**

- Korozo Group will neither offer nor accept unlawful payments, donations, bribes, gifts, or other improper benefits in commercial transactions with employees, suppliers, and business partners. All suppliers must guarantee that they are not involved in any activities that violate anti-bribery and anti-corruption laws and regulations in their respective regions and must actively work to eliminate all forms of corruption, money laundering, and bribery.
- Any personal relationships that could lead to a conflict of interest between suppliers and business partners should be avoided. Employees must refrain from any conflicts of interest and from using the company's name for personal gain.  
Korozo Group employees, suppliers and all other stakeholders should avoid fraudulent activities. All parties must prioritise integrity in all commercial relationships and refrain from intentionally providing misleading information in financial statements or reports.

# Ethics Policy

## Ethics of Competition

- Except as allowed by law, Korozo Group does not enter into agreements with competitors or other individuals or organisations that directly or indirectly prevent, distort or restrict competition, or that have or may cause such effects.
- The company competes only in legal and ethical areas and avoids unfair competition.
- We do not share commercially sensitive information, including customer and product details, with competitors and refrain from any correspondence and communication that violates competition ethics.

## Confidentiality and Protection of Company Information

- Our policy covers confidential and private information belonging to our company, information which may create a competitive disadvantage, trade secrets, financial information, information on employee personal rights, information on our customers and employees. The company shows utmost attention to comply with the Law 6698 on the Protection of Personal Data (“**KVK Kanunu**”) for the protection of this information.

## Honest and Fair Approach

- Integrity, accuracy, fairness and transparency are essential in all business processes and relations, all operations are managed openly and transparently, direct dialogue and information-based communication is established with employees and open communication with all stakeholders is promoted.

## Responsibility to Report Code of Ethics and Violations

Korozo Group does not engage in activities that hinder the discovery of unethical transactions/behaviours by others (whether individuals or organisations).

All Korozo Group employees and other relevant parties can report any ethical violations to our “**Ethics Reporting Helpline**” at **0212 866 66 25** or to the e-mail address **etik@korozo.com.tr**. If an employee or any other individual acting on behalf of Korozo is thought or suspected to violate this policy, it should be reported to the Ethics Committee. If a violation is found, the Disciplinary Committee should be informed.

During the investigation of a possible violation of the Code of Ethics, no actions will be taken against individuals who report an incident, participate or assist in the investigation of an incident (unless the report or the information provided is intentionally misrepresented).

Korozo Group Ethics and Disciplinary Committee ensures the confidentiality of all notifications.

*Effective as of 20.11.2015*

**Adam BARNETT**

**CEO**  


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# Sustainability Goals Table

Topic	Subtopic	Target	Related Policy	Target Set	Deadline
People	Ethical practice, Prevention of Corruption, Bribery and Conflict of Interest	<ul style="list-style-type: none"> <li>• Training 100% of our people on ethical behaviours upon onboarding</li> <li>• Training 100% of our people on anti-bribery and corruption</li> </ul>	Ethics Policy	2024	2025 and after
	Respect for Human Rights and Safety	<ul style="list-style-type: none"> <li>• Zero Accidents</li> <li>• Zero cases of harassment and 100% investigation of reported cases</li> </ul>	Occupational Health and Safety Policy Human Rights Policy	2024	2030
	Confidentiality, Protecting Company Related Information, Protection of Personal Data	<ul style="list-style-type: none"> <li>• Having 100% of employees complete/repeat information security trainings each year</li> </ul>	Information Security Policy	2024	2025 and after
	Diversity, Equity and Inclusion	<ul style="list-style-type: none"> <li>• Providing Gender Equality trainings</li> <li>• Monitoring WEPs* performance indicators</li> <li>• Ensuring 5% female representation in the blue-collar workforce by 2030</li> </ul>	Human Rights Policy	2024	2025 and after
Planet	Renewable Energy Policies	<ul style="list-style-type: none"> <li>• Using 100% renewable energy at all plants</li> </ul>	Environment and Deforestation Policy	2024	2032
	Emissions Reduction	<ul style="list-style-type: none"> <li>• Reducing Scope 1 and 2 emissions by 50,4% vs 2022</li> <li>• Reducing scope 3 emissions by 30% vs 2022</li> </ul>	Environment and Deforestation Policy	2024	2032
	Net Zero	<ul style="list-style-type: none"> <li>• Reaching net zero target by 2053</li> <li>• Ensuring stakeholder participation and capacity development on environmental issues particularly with suppliers</li> </ul>	Environment and Deforestation Policy	2024	2053 2025 and after
	Stakeholder Participation and Sustainable Supply Chain	<ul style="list-style-type: none"> <li>• Sharing Supplier Code of Conduct with all suppliers and monitoring compliance as part of sustainable sourcing practices</li> <li>• Conducting supplier surveys with 30% of active suppliers</li> <li>• Providing sustainability training to 30% of active suppliers</li> <li>• Conducting at least 3 supplier audits each year (on site)</li> </ul>	Sustainable Sourcing Policy	2024	2025 and after
Packaging	Circular Economy and Sustainable Products	<ul style="list-style-type: none"> <li>• Designing all our products to be recycle-ready and recycling by 2030</li> <li>• Increasing use of recycled content</li> </ul> <p>2030: Food grade items 10%, non-food products 35%</p> <p>2040: Food grade items 25%, non-food products 65%</p>	Sustainability Policy	2024	2030

\*WEPs - Women's Empowerment Principles

Adam BARNETT/CEO



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