

# Code of Ethics and Principles of Work

## **Purpose and Scope**

Ethics is a discipline that examines universally accepted values in human relations. Business ethics encompasses the entire set of principles that guide behavior in the business world. The core values and principles of BozBros Forest Products Inc. provide guidance for business ethics rules. These values and principles form the foundation of our business relationships and operations, defining our expectations, standards, and ethical practices. The BozBros Code of Ethics and Principles of Work applies to the company, all its subsidiaries, and all third parties and employees acting on their behalf. This document defines employee rights and also outlines the ethical values and fundamental principles of the company.

## **Respect in the Workplace and Work Life**

### **Equality**

At BozBros, our primary goal is to create a positive atmosphere in the workplace by providing respect, understanding, and openness in communication to our employees. We encourage open discussion of work-related issues and prioritize finding solutions to these matters. Developing team spirit, maintaining, and enhancing our corporate identity are among our common goals.

Our company offers equal opportunities to individuals with diverse backgrounds, including race, religion, nationality, gender, sexual orientation, marital status, age, seniority, and family. It is essential that our employees maintain their relationships based on mutual respect, fairness, kindness, honesty, and equality by valuing this diversity. BozBros aims to create a work environment that respects differences, values individual talents and experiences, and gives a voice to every employee.

Respecting diversity is not only a fundamental part of how we do business but also essential for our success.

## Principles Regarding Harassment and Bullying (Mobbing)

Our company does not tolerate any violation of immunity through physical, sexual, or emotional harassment against our employees or stakeholders. Negative attitudes or behaviors towards those who report such violations or assist in the investigation process are considered a violation of our ethical rules.

Bullying refers to systematic psychological harassment, pressure, and intimidation that an employee is exposed to in the workplace. This procedure aims to protect all employees within BozBros from bullying and to prevent such behaviors. All employees must be sensitive to bullying behaviors and act accordingly.

Bullying involves continuous and systematic psychological harassment, intimidation, and demeaning or harmful actions directed at an employee by one or more individuals. Bullying can adversely affect the victim's professional performance, psychological health, and social relationships. Behaviors that can be classified as psychological harassment (bullying) include systematic and planned actions aimed at demoralizing the targeted individual, reducing their performance, or forcing them to resign. Our employees must report any incidents of bullying they believe they are experiencing to the company immediately.

Upon receiving a bullying complaint, the relevant management will promptly initiate an investigation. Parties will be heard, evidence will be gathered, and an objective assessment will be made. Those who engage in bullying will face disciplinary actions in accordance with internal rules, which may range from warnings to dismissal. Complaints and investigation processes regarding bullying will be conducted in complete confidentiality, ensuring the privacy of the complainant and other parties involved.

In this situation, accusatory or retaliatory behaviors must be avoided. Managers must handle such cases with confidentiality and take the necessary steps.

For any questions or reports, please use the following contact channel:  
etik@bozalioglu.com

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## **Behavior and Appearance**

It should be noted that all employees' arrival at work and their behavior during work reflect on BOZBROS, and these must be conducted within the rules of politeness, regardless of personal characteristics. These rules should facilitate the adaptation of new employees to the company and are important for maintaining a culture of tolerance.

Our behavior and appearance must best reflect the trustworthy image of the company. This principle is crucial for developing customer relationships and enhancing the company's reputation and must be applied diligently. Creating team spirit and maintaining and improving the company's image is a shared goal both in the workplace and in personal life.

We must exhibit a professional and balanced attitude to avoid behaviors that could negatively impact our work and the reputation of the company. We must show equal respect to our customers, potential customers, shareholders, and communities, provide courteous service, and adhere to ethical business practices. As employees of a customer-oriented company, we have the responsibility to act in a way that creates a positive impression of BozBros Forest Products Inc.

## **Employee Attendance Policy and Control Process**

Employees of BozBros Forest Products are required to comply with designated working hours and to use the personnel attendance control system (such as face recognition systems) for clocking in and out. It is essential for employees to be present at the workplace during working hours.

If an employee needs to leave their workplace for any reason, they must inform their relevant manager or closest colleague about their destination and duration. Employees required to be outside the workplace due to their duties must notify their managers about their destination and the time they will spend outside.

## **Information Sharing and Transfer of Responsibility**

An employee who will leave their position permanently or temporarily cannot depart without handing over any money, valuable documents, or equipment entrusted to them. This principle also applies to temporary changes in duties.

## **Relationships Within and Outside the Company**

### **Relationships with Government and Public Institutions**

The company's relationships with government and public institutions must be based on the highest levels of accuracy, honesty, equality, and independence.

### **Relationships with Customers, Suppliers, and Other External Organizations**

Our employees must act in accordance with the principle of integrity when representing the company in relationships with customers, shareholders, affiliates, and other companies. Our primary goal as a company is to meet the needs of our customers while respecting people and nature. Customer satisfaction is a significant factor determining our success, and therefore, our customers are the focal point of our business.

Ensuring customer satisfaction is our best advertising tool; thus, our customer relationship management is based on professionalism, politeness, seriousness, and reliability. In customer relationships, honesty, equality, and compliance with laws must be upheld at the highest level. Our employees should ensure they provide customers with complete and clear information about the company's products and services. Employees do not have the right to mislead customers for personal gain. Customers are clearly informed about their rights, obligations, and the benefits and risks associated with the transactions involving BozBros Forest Products Inc. Therefore, our employees have the responsibility to be knowledgeable about the services and products related to our company.

Unprofessional behavior, such as providing incorrect or incomplete information to customers or applying pressure during the decision-making process, cannot be tolerated. Our employees must act in accordance with the principles of protecting trust within the energy sector, developing the industry, and promoting mutual interests. They must avoid behaviors that constitute unfair competition and remain impartial regarding competing organizations and products during their duties.

Relationships with suppliers are also based on the aforementioned rules, and confidentiality agreements with any consulting parties must be established.

Employees of BozBros Forest Products Inc. may not make any real or apparent commitments on behalf of the company without authorized approval, whether formally or informally. Additionally, they must not engage in activities that could harm public morals, the environment, or public health. All employees must especially avoid any activities that may violate competition law, such as the abuse of dominant market position.

## **Preventing Conflicts of Interest**

Employees of BozBros Forest Products Inc. should strive to make impartial and objective decisions within the scope of their duties and responsibilities. We avoid situations that could cause personal interests, those of family members, or close associates to conflict with the interests of the company or create the impression of such a conflict. When such a conflict of interest arises, the issue should be immediately shared with our managers and the compliance officer to take necessary precautions to prevent potential harm.

To prevent possible conflicts of interest:

- We refrain from using our titles or authority to gain any advantage for ourselves or our close associates.
- We avoid personal investments that could impair our ability to fulfill our duties at BozBros Forest Products Inc. or lead to conflicts of interest.
- Even outside working hours, we do not engage in any work that could violate our loyalty obligations to BozBros Forest Products Inc. or adversely affect our individual performance.
- We inform our manager and the compliance officer of any familial or personal relationships involving primary decision-makers in the business activities of our partners with BozBros Forest Products Inc.

## **Preventing Money Laundering, Terrorism, and Financing of Weapons of Mass Destruction**

Money laundering refers to the process of disguising proceeds obtained through crime as legitimate income and integrating them into the financial system. At BozBros Forest Products Inc., as part of our commitment to full compliance with local and international regulations, we avoid any commercial transactions that could be associated with money laundering, the financing of terrorism, or the proliferation of weapons of mass destruction.

Therefore, before establishing business relationships with third parties, we conduct detailed due diligence to know the relevant parties and assess potential risks. BozBros Forest Products Inc. strives to avoid business relationships with third parties for whom we do not have sufficient information, who have negative intelligence, or who pose such risks.

## **Compliance with Economic Sanctions and Export Controls**

As a part of international trade, BozBros Forest Products Inc. takes the necessary and effective measures to ensure full compliance with regulations concerning economic sanctions and export controls. In this context, we do not establish commercial relationships with individuals, institutions, or organizations that are under embargo or listed on sanction lists. If contact with such individuals is necessary for any reason, prior approval must be obtained from the compliance officer or relevant unit before making contact.

## **Compliance with Competition Law**

At BozBros Forest Products Inc., we adhere to legal regulations and act in accordance with the company's reputation in all countries where we operate. We do not engage in any practices that may violate competition law. Our fundamental principles for ensuring compliance with competition law are:

- We avoid colluding with competitors regarding price or market division.
- We do not exchange information that may distort competition or lead to collusive agreements.
- We do not attempt to limit competitors' business activities.
- We comply with laws and regulations in all markets where we conduct business.

## **Whistleblower Protection and Reporting Violations**

As employees of BozBros Forest Products Inc., we have the responsibility to report any violations of laws, regulations, or company policies we encounter in our working environment. We can report violations or ethical dilemmas to our managers, compliance officers, or authorized representatives without fear of retaliation. We respect and protect whistleblowers who report in good faith. Every report will be handled with complete confidentiality and promptly evaluated. We do not tolerate any negative consequences for whistleblowers.

## **Responsibility for Compliance**

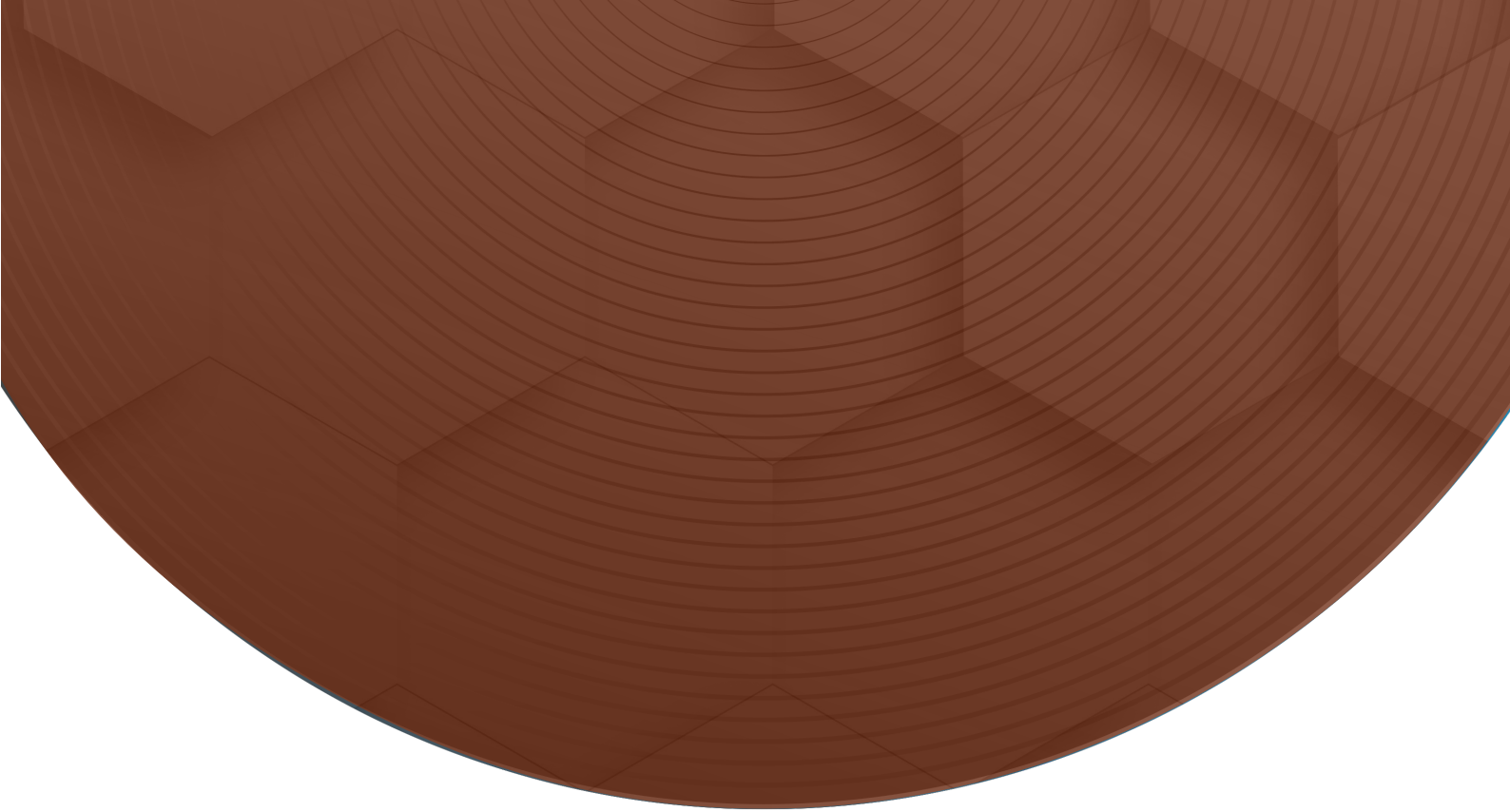
The company management is responsible for ensuring the implementation of the Code of Ethics and Principles of Work within the organization. All employees of BozBros Forest Products Inc. must comply with the ethical rules outlined in this document and take the necessary steps to prevent violations.

## **Training and Awareness**

Employees of BozBros Forest Products Inc. receive training and information to understand the importance of the Code of Ethics and Principles of Work. Regular training sessions will be organized to ensure all employees are aware of their responsibilities regarding ethical behavior and compliance with laws.

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**BozBros Board of Directors**



**BOZ/Bros**  
D·R·U·M·S/R·E·E·L·S