

# BEING A PART OF ATEŞ WIND POWER

CORPORATE ETHICAL PRINCIPLES  
AND CODE OF CONDUCT GUIDE



# ● CONTENTS

1. Introduction	●	3
2. For All of Us	●	5
3. Our Ethical Principles	●	6
4. Code of Ethical Conduct	●	12
5. Consultation and Supervision	●	21
6. Decision Making Tree Regarding Ethics Committee Applications	●	24





# ● INTRODUCTION

**Dear valued members of the Ateş Wind Power family,**

Our company, Ateş Wind Power, was established to make domestic production and export in the field of renewable energy. We have been operating towards the goals of both the development of our country and ensuring sustainability on a global scale.

We strongly believe that the foundation of working together in harmony and achieving success is established through adopting and implementing the internationally accepted ethical values and corporate policies within the framework of our corporate vision and mission.

Our corporate ethical principles not only organize our relationship with our internal and external business partners, but also have the quality of providing a guideline for our colleagues working at every level of Ateş Wind Power. We place significant emphasis on each and every Ateş Wind Power family member adopting these principles in order to produce and achieve together and to prepare our company and our world for the future in the best way possible.

Our Integrated Management System has been structured to ensure the effective implementation of our ethical principles and company policies. You may find all our ethical principles, primarily our Quality Policy and Sustainability Policy, in coherence with other policies of our company in this guide.

**We would like to thank you for working with us and bringing the pride of being a part of Ateş Wind Power to the future.**











## ● FOR ALL OF US

Ateş Wind Power Ethical Principles and Code of Conduct have been prepared as a guide for our employees from all levels of the company, particularly the management. Therefore, led by the Board of Directors and our colleagues who have the signature of authority, all employees are responsible for the implementation of these principles.



# ● OUR ETHICAL PRINCIPLES

## ● Integrity and Honesty

We function following the rules of integrity and honesty and act in good faith in all our internal and external business and transactions.

## ● Human Rights

We ensure that our operations comply with the internationally recognized human rights documents.

## ● Environment

It is one of our priorities to protect the environment, to adopt and develop eco-friendly technologies and practices.

OUR  
ETHICAL  
PRINCIPLES





## ● OUR ETHICAL PRINCIPLES

### ● Complying with laws and regulations

We make the utmost effort to comply with the relevant laws and regulations in all our internal and external business and transactions. We exercise due diligence in terms of protection of intellectual and industrial property rights. In this context, we perform the necessary legal, financial and technical competencies within our organization or outsource them. We ensure that all financial bookkeeping and records are in accordance with the relevant standards and regulations. We make sure that the necessary independent audit studies are conducted for this purpose.





# ● OUR ETHICAL PRINCIPLES

## ● Relations with Business Partners

We always keep communication channels open with all our business partners and manage the company in such a way that represents its reputation. We try to benefit from criticism and suggestions. We care to participate efficiently in public decision making processes within the framework of both company requirements and corporate social responsibility.

## ● Relations with Employees

Compatibility with the job is our main concern during the recruitment process. We provide opportunity equality and do not discriminate. We never exercise unlawful working relationships and we do not allow forced or child labour. We act objectively and fair in terms of performance evaluation and wages. We place necessary emphasis on creating a harmonious work environment and on ensuring personal development of our employees. We provide a safe, healthy and productive work environment. We secure continuing labour peace. Colleagues are encouraged to participate in relevant management processes. We supervise and encourage subcontractors to apply these principles.

OUR  
ETHICAL  
PRINCIPLES











## ● OUR ETHICAL PRINCIPLES

### ● Relations with Shareholders

We act within the framework of the rights determined by law in our relations with shareholders.

### ● Relations with Clients

In our relations with clients, we take necessary action to meet the quality requirements at highest level, create added value and work towards a solution, provide accurate and trustworthy information and act fairly and professionally within the framework of courtesy rules. We take all necessary measures to protect the confidential information of our clients.



# ● OUR ETHICAL PRINCIPLES

## ● Relations with Competitors

We never allow situations that would create anticompetitive or unfair competition circumstances. We cooperate with rival companies by with these rules to contribute to the development of the renewable energy sector.

## ● Relations with Suppliers

We choose our suppliers based on objective criteria. Among a wide range of suppliers, we apply the principles that are valid with their other business partners by comparison but fully.

## ● Fighting Against Bribery and Corruption

As Ateş Wind Power, we take all necessary measures to avoid the establishment of relations on behalf of our company which would be considered in the scope of bribery and corruption.





# ● CODE OF ETHICAL CONDUCT

## ● Awareness of Ethical Principles

As Ateş Wind Power employees, it is our responsibility to have the necessary awareness of our Ethical Principles and to consider them on behalf of our company in all our business and transactions. It is our duty to favor fundamental moral and human values, to act according to the regulations, be fair and just in terms of creating and making profits, and to protect our environment and corporate assets in this context.

CODE OF  
ETHICAL  
CONDUCT





# ● CODE OF ETHICAL CONDUCT

## ● **Avoiding Conflict of Interest**

Conflict of interest means any kind of benefit or opportunity for ourselves, our relatives, or the people or organizations that we are in contact with which could or would affect our ability to do our duty impartially.

We avoid creating benefits that would cause a conflict of interest within the framework of our duty in the company.

We never use Ateş Wind Power name and reputation for personal gain. We refrain from using the information we obtain due to our duty to gain benefits and never share inside information with third parties.

We participate in all sorts of representations and organizations held by individuals and institutions, which we are or may be in business relations with the express permission of our unit manager or our colleagues who have the signature of authority.

We immediately report to our unit manager of any interest relations or affinities we have with people or organizations with whom we have or may have business relations (for instance, shareholding, kinship up to a third degree, a job offer, debt situation or surety, etc.). We do not participate in the decision making process that concerns having a business relationship with an individual or an institution we have a profit relation or affinity with. We strictly refrain from establishing new profit-based relations with individuals and institutions our company is in business relation with.

We may take part in the works of professional organizations and non-governmental organizations without compromising our duty within the company. We make donations to causes we deem appropriate. However, we do not use the name Ateş Wind Power and its facilities during these personal activities.









## ● CODE OF ETHICAL CONDUCT

### ● Caution in Gifts and Treats

It is acceptable within the framework of business world etiquette and may be necessary for business development to accept promotion materials and souvenir gifts with a monetary value of less than 50 USD from individuals and companies that we are or may be in business relation, to accept refreshments during meetings and to participate in activities such as business receptions.

Nevertheless, as Ateş Wind Power employees, we strictly refrain from accepting all sorts of gifts and activities with a monetary value of more than 50 USD. Because this may create the impression of providing financial benefits which may be considered in the context of bribery. Free or discounted tickets or shopping incentives are also in this category. Cash or cash equivalents (for instance gift certificates) are never offered nor accepted.



# ● CODE OF ETHICAL CONDUCT

## ● Care in Personal Finance Management

We pay attention not to create a conflict of interest with our company and not to affect our work performance during our personal finance management. It is required that we do not directly or indirectly hold shares in companies that are in competition with Ateş Wind Power or among the company's suppliers apart from the listed ones. We should not invest in listed companies based on the inside information we obtain within the scope of our duty at Ateş Wind Power.

It is essential not to borrow excessively in proportion to our income. As Ateş Wind Power employees, we do not borrow from or vouch for each other since these situations may have a negative effect on the peace of the workplace.

CODE OF  
ETHICAL  
CONDUCT





# ● CODE OF ETHICAL CONDUCT

## ● Loyalty Obligation to the Company

We do not work for a third party either a natural person or a legal entity during or after work hours, we do not participate in the management of any partnership and do not spend working hours in any other ways without the written consent of the Board of Directors. Activities such as expertise, consultancy, and training are also included in this context.

We do not offer our certificates, vocational competency documents, authorization certificates, and similar documents that we received within the framework or our diplomas and professional competencies to a natural person or a legal entity.

It is essential that we spend our working hours efficiently and devoted to our duty within the company and deal with our private business after work hours. Our unit managers do not take advantage of their subordinates for their own business.

## ● Protection of Company Reputation

As Ateş Wind Power employees, we can not make statements and participate in any kind of activities on behalf of the company as a spokesperson or as such without the written consent of employees who are authorized in the circular of signature. Press and social media statements on behalf of the company are also subject to the written consent of the Board of Directors.

Company reputation is the first and main concern in all correspondence made on behalf of the company. We do not use company resources, mainly our e-mail accounts, for our correspondence that is not related to work. Moreover, we consider our Ethical Principles, courtesy rules, and relevant procedures in all correspondence we make on behalf of the company.

We consider the interest of the company in our social media posts. We do not make any negative statements about our company, clients, suppliers, or competitors. We do not share company-related correspondence, documentation, and photographs of production facilities. Creating groups regarding Ateş Wind Power on social media is subject to the consent of the unit manager or colleagues who have the signature of authority.







# ● CODE OF ETHICAL CONDUCT

## ● Protection of Company Assets

We take utmost care to ensure that the expenses we approve and realize on behalf of the company are economical and cost-effective. We report our expenses transparently, on time, and in line with relevant procedures.

We refrain from using company assets for our private business including company cars allocated for our use, computers, mobile phones, e-mail accounts, and similar means and facilities.

## ● Protection of Company Information

We acknowledge that commercial, legal, human resources, financial and technological information of Ateş Wind Power is confidential. We should not share information we have acquired or developed within the framework of our duty at Ateş Wind Power with people who are not relevant either within or outside the company.

It is essential that information and documents regarding our company, clients, and suppliers are not removed from the company by any means, i.e. physically or electronically. In situations where it is required to be removed, we must receive permission from our unit manager and abide by the procedures regarding information security.

It is required that personal data should not be recorded without appropriate conditions and irrelevant to its purpose within the company. We should not share non-public personal data with each other such as employee files and wages which we obtain through our duty.

We must remember that complying with the technical and administrative measures taken in order to protect confidential information and personal data is an ethical obligation.



# ● CODE OF ETHICAL CONDUCT

## ● Responsibility Concerning Employee Relations

As Ateş Wind Power employees, we attach great importance to complying with ethical obligations that are effective within the company. We comply with the values regarding employee relations adopted by our company, non-discrimination particularly. As Ateş Wind Power employees, we manage our relations with each other on a professional level according to courtesy rules within the workplace. The degree of our closeness should not alter the way we approach, address, and behave towards each other.

We take utmost care to maintain a harmonious working environment and refrain from behaviors that may disturb or harm our colleagues.

Behaviors that are considered to be in the context of mobbing (such as criticizing the work done with malicious intent, criticizing private life or appearance, deliberate avoidance of communication, spreading negative discourses) have no place in Ateş Wind Power.

## ● Transparency

As Ateş Wind Power employees, we are aware of the fact that transparency is encouraged in our workplace. We meet the demands of auditors fully and accurately during internal and external auditing processes. We do not provide misleading information under any circumstances. It is essential to inform our unit manager in advance about any kind of information and documents we submit to the auditors.

Professional errors are a natural consequence of business life. We never conceal professional errors and submit them for relevant unit manager's review. In doing so, we ensure that the effects of the mistakes are reduced and they are not repeated.



# ● CONSULTATION AND SUPERVISION

## ● Ethics Committee

An Ethics Committee has been established within our company to provide consultation and audit regarding the Code of Ethical Conduct. The structure of the Ethics Committee and the decision-making process is organized through the Ethical Principles Procedure.

## ● Right to Consult the Ethics Committee

When we hesitate whether certain behaviors are against the Code of Ethical Conduct or not we have the right to consult the Ethics Committee. We will not be subjected through any disciplinary sanction if we act according to the judgment of the Ethics Committee. In that case, the company is responsible for the outcome.

## ● Obligation to Notify the Ethics Committee

When we consider or suspect that certain situations are against the Code of Ethical Conduct, an obligation arises to notify the Ethics Committee. If one of the members of the Ethics Committee is involved in this certain situation, then it is possible to consult other members of the Ethics Committee or to apply directly to the Board of Directors via e-mail.





## ● CONSULTATION AND SUPERVISION

### ● Common Issues Regarding the Right to Consultation and the Obligation to Notify

We may benefit from the attached decision-making tree to guide us about under what circumstances we should consult the Ethics Committee.

Our applications to the Ethics Committee are kept confidential and they do not lead to disciplinary action unless the context legally requires otherwise. The cases where the applications are libelous or revealed that they are slanderous without a doubt are reserved.

We can easily apply to the Ethics Committee via [etik@atescelik.com](mailto:etik@atescelik.com) The e-mails sent to this account will be delivered to at least one of the Ethics Committee members. A written report with a wet signature may be required if it is considered necessary regarding any application.

It is possible to apply directly to the Ethics Committee members either orally or in written form. In this case, the Ethics Committee member who receives the application informs the other members of the committee. However, if the application concerns one of the Ethics Committee members, that member is not informed. Written report with wet signature may be required if it is considered necessary regarding any application.

If the application is made to an Ateş Wind Power employee or a representative who is not a member of the Ethics Committee, then that application should be delivered to the Ethics Committee or one of the committee members.



# ● CONSULTATION AND SUPERVISION

## ● Violation of the Code of Ethical Conduct

The goal of the inspections carried out by the Ethics Committee is to determine the preventive and corrective measures required to comply with the Code of Ethical Conduct.

Within this context, (a) the employees who are considered to exhibit actions that are violating the Code of Ethical Conduct may be provided with guidance or may be given a warning in written form and/or (b) suggestions regarding general measures that would be considered appropriate under the circumstances may be presented to the relevant units or to the Board of Directors.

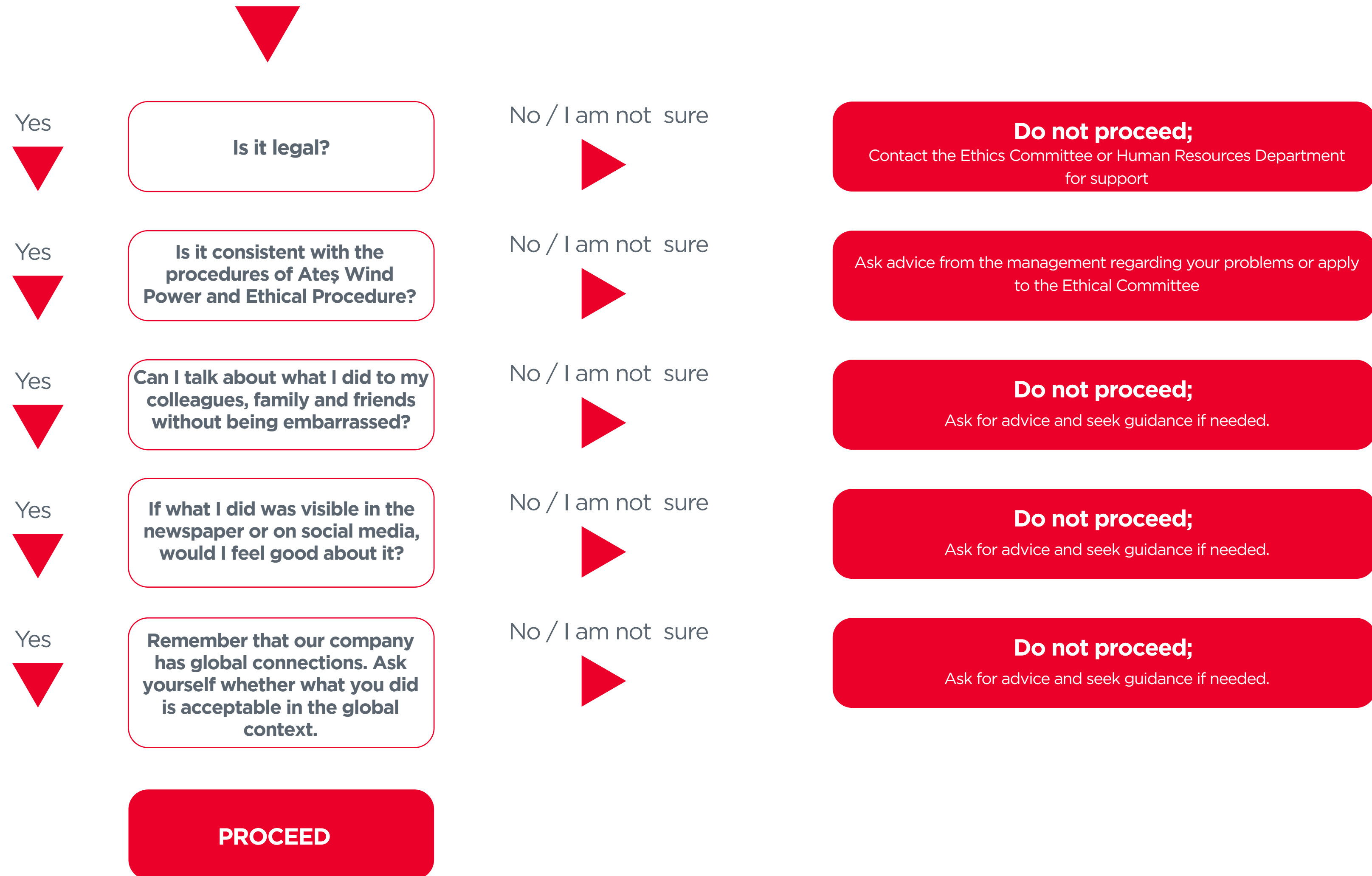
If the Ethics Committee determines within the context of its auditing duty that the aforementioned violation is also an action that requires disciplinary sanction, then the committee refers the matter to the Human Resources Department to be discussed in the relevant Disciplinary Committee. In this case, guidance or warning regarding the behavior that contradicts the Code of Ethics is not given.





# DECISION MAKING TREE REGARDING ETHICS COMMITTEE APPLICATIONS

If you have any doubts about the work you are doing/will be doing ask yourself





# ATES

## WIND POWER

Zeytindađ Mahallesi 2208 Sokak No:1 35720 Bergama/İzmir  
+90 (232) 877 22 24/info@atescelik.com/www.atescelik.com