



PIMSA AUTOMOTIVE

CODE OF CONDUCTS

FIRST RELEASE : 26.09.2019

REVISION NO : 01

REVISION DATE : 31.10.2024



Author HR Manager	Controlled by Quality Manager	Approver General Manager
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1. Why Do We Need an Instruction?

At Pimsa Automotive, we believe in doing things right. Not at times. Without exception, always.

If being a member of Pimsa Automotive is a journey; Our corporate values are our roadmap, and this instruction is our compass.

We believe with all our hearts that if the fog descends and we cannot see ahead, we will always find the right direction with this map and our compass that never deviates from the true North.

For this reason, these instructions and our corporate values are critical elements that define us. Follow them with a will of steel.

1.2. Is Everyone Working at Pimsa Otomotiv Subject to This Instruction?

Yes. This instruction applies to everyone and everywhere we do business.

Regardless of position or seniority; All of our employees, whether they are on the payroll or subcontracted, working full-time or part-time, with an indefinite term or fixed-term employment contract, are responsible for the implementation of this instruction.

Not only our employees; Our consultants, outsourced trainers, suppliers, in short, everyone working for or on behalf of Pimsa Automotive is responsible for working according to this instruction.

Any behavior that does not comply with the instruction can have very serious legal and financial sanctions, not only for you, but also for our company. Even our corporate reputation can be damaged due to such behavior. This cannot be allowed.

1.3. What happens when the instruction does not directly answer your questions?

This instruction is there to give us a direction. Although it can't answer all the questions or depict how to act in every different case; By understanding the basic principles of the instruction, you can at least know the direction of the general course that is expected in any circumstances.

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If you find yourself in a situation similar to the one depicted above that you are not sure how to act, consult your reporting manager, a senior manager, or a corporate lawyer.

1.4. What to Do When There Is a Conflict Between the Instruction and the Law?

This instruction is designed to guide us to a legally safe area. However, if you still find yourself in a situation where instruction and law conflict, consult your reporting manager, a senior manager, or a corporate lawyer.

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Pimsa Automotive Corporate Values

One Heart, One Pimsa

I trust honestly and communicate clearly and cleanly. I recognize and appreciate success. I offer help and support without being asked.

I Am Customer Oriented

I represent my client. I deliver the quality product at the right time at an affordable cost.

I'm productive

I am hardworking, I exist by producing. I use my effort, time and resources effectively.

I Do Safe Business

I come to work safely, work safely, and return to my home and loved ones safely.

I'm innovative

I approach every job innovatively and look for opportunities for improvement at every step. I produce solutions with an open mind, follow them and implement them.

I Work Efficiently

I use resources efficiently and avoid waste. I want to achieve more with less.

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2. The Principle of Respect for the Individual

2.1. Mutual Respect

Our corporate values bring us together to do business within the framework of trust, open communication and mutual respect. We encourage the idea of being one big team, with a heart beating in harmony.

For this reason, threatening, hostile behaviors aimed at intimidating or intimidating that will lead to an aggressive business environment are clearly not welcome at Pimsa Automotive.

Treat your colleagues and business partners with respect.

Don't try to intimidate, never threaten or bully anyone.

If you come across a practice that is frowned upon in this way, please state that you do not condone the behavior in question and object to it, regardless of who the person who is the victim of this behavior is.

Do not tolerate any form of harassment (verbal/physical) (gender, race, religion, ethnicity, etc.) and even object to inappropriate humor or activities that may cause discomfort to others.

2.2. Equality

All Pimsa Otomotiv employees (regardless of positional superiority) are expected to treat each other equally regardless of religion, race, language, ethnicity, disability, political opinion, union membership, age or gender.

With the principle that every individual should have equal opportunities, we support the equal evaluation of everyone in terms of recruitment, promotion, training and other opportunities in line with their abilities and potential. We support a culture of equal opportunity based on competence, experience and performance in all positions, and strive to create diversity

It is forbidden for any person / organization to be favored or discriminated against in any corporate process (wages, training, recruitment, promotion, etc.) due to a unique feature.

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Pimsa Otomotiv hires employees in accordance with the law, in a fair and transparent manner, respecting and protecting their rights.

2.3. Equal Opportunity

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2.4. Occupational Health & Safety

We believe that most, perhaps all, occupational accidents can be eliminated when treated as follows;

- We act in accordance with the procedures that have been put in place to protect us and those around us.
- We make sure that our working environment meets the legal requirements for occupational health and safety, and if possible, exceeds these requirements.

Learn and know our company's occupational health and safety expectations by heart.

Have a good understanding of the severity of the consequences that may be faced if the instructions are not followed.

Always wear your protective gear when entering/working in designated areas, without exception.

Correct/report all hazards and unsafe behavior.

Do not use, carry, possess any drugs / narcotics that are not allowed to be kept in the work environment.

Do not work in any way when you are drunk or not yourself in any way.

2.5. Environment

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Pimsa Automotive carries out all its activities in accordance with the relevant environmental legislation.

Be sure to take the necessary precautions when working, transporting or disposing of hazardous materials or waste.

Follow the instructions when using/disposing of chemicals (corrosive, flammable, explosive, etc.).

Promptly report spills, spills, or unsafe/non-standard incidents.

2.6. Land, Forest and Water Rights and Forced Eviction

Soil, forests and water resources are critical to the health of ecosystems and the sustainable use and conservation of these resources is fundamental to our policy. Through its activities, our company has ensured that it does not participate in the crime of relocation of persons from their own territory in any way.

2.7. Rights of Minorities and Indigenous Peoples

The cultural identities and linguistic rights of minorities and indigenous peoples are protected. In carrying out our activities, we recognize and respect the rights of indigenous people and minorities. Cultural and language rights are guaranteed through education, media and cultural activities.

2.8. Freedom of Association

We respect the right of our employees to organize or unionize for better representation.

We also respect the rights of our employees to refrain from such representations or memberships.

You are free to consult reputable trade unions with any work-related questions.

If you are in a managerial role, refrain from interfering in employees' decisions about union rights.

2.9. Working Hours & Wages & Benefits

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At Pimsa Automotive, under what conditions, what is expected of you and your job description are clearly shared.

Pimsa Otomotiv hires employees in accordance with the law, in a fair and transparent manner, respecting and protecting their rights.

Your employment contract is in accordance with your job description; It covers your working conditions, the way you work, and the wages and other benefits you will receive for your work.

Pimsa Otomotiv working hours will be in line with labor law and other relevant legislation in force now and always.

For this reason, your working time at Pimsa Otomotiv will never exceed the legal upper work threshold and your rest period will always be in compliance with the labor law.

Our company is always proud of the fair and fair wages and benefits it offers to its employees.

Thus, you will always be fairly rewarded for your precious labor.

2.10. Forced Labor & Child Labor

Pimsa Otomotiv will never tolerate modern slavery or child labor practices under any form or guise.

We believe in children's right to personal development and education. For this reason, we never tolerate the use of child labor, we never employ workers who are considered children according to the labor law, and we do not even include them in the recruitment process. However, we boldly report any nonconformities we encounter to the relevant authorities.

2.11. Use of Private or Public Security Forces

We have taken measures to ensure that our security services serve in a way that respects human rights and that law enforcement is consistent and in line with international norms and standards. We ensured that security personnel (employed and/or contracted) were trained, independently identified and investigated in respect of complaints about human rights standards and security procedures. We take the necessary care to ensure that we do

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not participate in, facilitate or profit from human rights violations committed by public security forces.

3. Fair Trade Principle

3.1. Product

We design, manufacture and deliver our products to our customers in accordance with strict internal quality standards and customer/legal requirements.

Our products, which do not fully satisfy us in terms of quality, can never come out of the production area. Never.

Be sure to follow the standard and instructions at every step of the manufacturing process.

Never tamper with the tests or interfere with the test results.

Never take shortcuts or skip process steps to save time or resources. There are no shortcuts on the road to quality. Shortcuts lead you to poor business results and a negative reputation. This cannot be allowed.

3.2. Fair Competition

We rely on the ability of our employees / institution and the quality of our products for the success and sector position we desire to achieve.

For this reason, we do not engage in illegal activities that will give us a strategic advantage over our competitors or enable us to get ahead.

We treat our customers and suppliers professionally. We never ask for or collect sensitive information that may give us a possible unfair advantage over our competitors.

We respect confidentiality and do not disclose information (business plans, formulas, prices, rates, market shares, etc.) that may be relevant to another company in the industry.

3.3. Anti-Corruption

No Pimsa Otomotiv employee can have a (potential/existing) interest relationship with a business contact outside the company, and cannot even give the impression that this is the case.

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In this context, Pimsa Otomotiv employees are strictly subject to the legislation regulating the issue of accepting/giving gifts.

3.4. Compliance with Commercial Legislation

As an international shipping company, we operate under international commercial law, which sets out the rules for the cross-border transport of goods.

Know the commercial law and relevant legislation and follow these rules. Literally.

Be aware of and apply trade constraints that apply where we do business.

Ensure that there is no legal sanction in the way of our business partners, suppliers and all other third-party stakeholders doing business.

Make sure that all customs and export requirements are met by the book, including paperwork.

3.5. Anti-Money Laundering

Pimsa Otomotiv does not tolerate any institution that is involved in criminal activities such as concealing the source of illegally obtained financial returns.

Be on the lookout for signs that may be related to money laundering.

Report such activities to your supervisors or competent authorities immediately.

4. Prevention of Conflicts of Interest

4.1. Conflicts of Interest

All Pimsa Otomotiv employees are expected to fulfill their duties with the utmost care and diligence.

All employees must follow ethical instructions without exception in their relations with colleagues, business partners and other stakeholders.

When making business decisions, remember that the interests of the company come before the interests of yourself or your family.

Inform your supervisors immediately if any of the following situations occur:

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- Hiring someone with whom you already have a close relationship or being appointed as their manager.
- To run a side business that is in a business relationship with Pimsa Automotive or that is a competitor to Pimsa Automotive.
- A family member is hired by a potential customer, supplier, or competitor, or your family member acquires the organization.

Never exchange money through your personal account with customers, suppliers or third parties who may be even remotely related to Pimsa Automotive.

4.2. Political Activities

Pimsa Automotive, whose purpose of existence is to do business, takes an impartial stance against all political activities. Therefore; It does not highlight political parties, the names of their candidates or party propaganda at any time and for any reason, and does not make their campaigns.

From this point of view, as an employee, you should not use company resources for any political purpose in any way.

Likewise, never raise money for any political purpose when you are in a business environment or on behalf of Pimsa Automotive.

4.3. Information Leakage

While working at Pimsa Automotive, you can access a number of sensitive information (product quality issues, recalls, innovative products/processes, strategic purchases, etc.) that can be used for your or your family's financial benefit.

We do not use or disclose such information to gain an unfair advantage, nor do we tolerate those who use such information for their own gain.

5. Corporate Memory & Protection of Assets

5.1. Confidentiality

Make sure you or your team has the necessary access to the information. Neither more nor less than necessary.

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Never use your data access to track someone else or collect information about others in a confidential and illegal way.

If you encounter such an action or if you are asked to do so, notify the authorities as soon as possible.

Share the right information with the right audience. Always double-check if in doubt.

Never share company information on social media, never discuss company issues on social media.

Never leave written or printed company information in public areas.

After presentations or meetings, clean up whiteboards and take presentation papers with you.

Protect the information (verbal/electronic/printed) shared with you by your customers, suppliers or business partners as if it were yours.

5.2. Intellectual Property

Intellectual property can be a technological invention, a factory plan, a formula, or a trade license.

It is impossible to be sure without checking which idea has been taken ownership of it.

Pimsa Otomotiv carries out the necessary legal actions to protect intellectual property and will take legal action to protect this information if it deems necessary. In the same way, Pimsa Otomotiv always respects the intellectual property of others.

From this point of view, if you find yourself in the slightest hesitation, consult your supervisors. It's better to keep information to yourself if you're not sure it's public.

Do not disclose any photos or audio recordings taken in the business environment on social media, do not send them to anyone else via e-mail or file sharing tools over the internet.

Likewise, do not take risks that may seriously harm not only you but also our company, and that may trigger legal intellectual property lawsuits.

5.3. Physical & Financial Assets

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All physical (company vehicles, offices, computers, telephones, etc.) and financial (corporate credit cards, debit cards, checks, etc.) assets provided by Pimsa Otomotiv have one absolute purpose: the continuity of our business.

We must use these assets responsibly and always in accordance with internal instructions.

Never use these assets for personal benefit or for the benefit of anyone else.

As soon as you have even the slightest suspicion of possible theft or abuse, report the situation to your superiors.

Remember that we are always accountable by what is entrusted to us.

Remember that we must always be accountable for these assets entrusted to us.

5.4. Information Security

We conduct our business in accordance with the applicable personal data protection law.

We clearly disclose the type of information we collect, how we store that information, and how we eliminate it when we are done with that information.

We do not share any personal data with unrelated persons/institutions without personal consent.

Do not access personal data on company systems unless our job diagnosis tells you otherwise.

If you have access to information about others that you don't need, let your manager know.

6. Transparency & Accountability

6.1. Accounting & Reporting

At Pimsa Automotive, we provide timely and accurate reporting in order to better illustrate our actual performance.

This means that we report our financial transactions in accordance with generally accepted accounting rules.

Be honest and diligent when reporting or recording information about our business.

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Never alter or distort the results.

If you feel a mistake or deceit, report it immediately to your manager or a senior supervisor.

7. What Should You Do When You Think That The Order Is Not Executed?

People who think that the Ethical Instruction is not operated [can reach the etik@pimsa.com.tr](mailto:etik@pimsa.com.tr) address by e-mail or contact their managers directly. Anonymous e-mails will not be answered to prevent abuse.

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