

Code of Business Ethics

I. OUR CODE OF BUSINESS ETHICS

A. Integrity

Honesty and integrity are our priority values in all our business processes and relationships. We act with honesty and integrity in our relations with employees and all our stakeholders.

B. Confidentiality

Confidential and private information includes information that can create a competitive disadvantage for Datacore Information Systems Ind. and Trade Inc. (“Datacore”), trade secrets, financial and other information not yet disclosed to the public, personal rights information, and information covered under confidentiality agreements with third parties.

As Datacore employees, we take care to protect the confidentiality and privacy of our customers, employees, and other related individuals and organizations. We protect confidential information related to Datacore's activities, use this information only for Datacore’s purposes, and share it only with authorized persons within defined limits.

For us, obtaining any commercial benefit by leaking any kind of confidential information belonging to Datacore is strictly unacceptable. We do not take out confidential information and documents, projects, regulations, etc., which we possess due to our duties, when leaving the company.

C. Conflict of Interest

As Datacore employees, we aim to avoid conflicts of interest. We do not gain personal benefits from people and organizations with whom we have business relations by using our current position personally, through our family or relatives. We do not engage in any financial activities outside Datacore that are based on personal gain. We avoid using Datacore's name and power, our Datacore identity, for personal gain. In cases of potential conflicts of interest, we apply methods that can safely protect the interests of the relevant parties through legal and ethical means. In cases of doubt, we consult our manager, the Human Resources Department, or the Ethics Committee.

D. Our Responsibilities

In addition to our legal responsibilities, we strive to fulfill our responsibilities towards our customers, employees, shareholders, suppliers and business partners, competitors, society, humanity, and Datacore. These responsibilities include:

1. Our Legal Responsibilities

We conduct all our domestic and international activities and transactions within the framework of Turkish laws and international law, and provide accurate, complete, and understandable information to regulatory institutions and organizations on time. We fulfill our obligations with the awareness of this responsibility, maintaining equal distance from all

public institutions and organizations, administrative bodies, non-governmental organizations, and political parties, without any expectation of benefit.

2. Our Responsibilities to Our Customers

We work with a proactive approach that focuses on customer satisfaction, responding to the needs and demands of our customers as quickly and accurately as possible. We provide our services on time and under the promised conditions, treating our customers with respect, honor, justice, equality, and courtesy.

3. Our Responsibilities to Our Employees

We ensure that employees' personal rights are fully and correctly utilized. We approach employees honestly and fairly, committing to a non-discriminatory, safe, and healthy working environment. We make efforts to support the individual development of our employees, encourage them to volunteer in social and community activities with a sense of social responsibility, and balance work life with private life.

4. Our Responsibilities to Our Shareholders

Prioritizing the continuity of Datacore and aiming to create value for our shareholders, we avoid unnecessary or unmanageable risks and aim for sustainable profitability. We act within the framework of financial discipline and accountability, managing our company's resources and assets with efficiency and savings awareness. We focus on increasing our competitive power and investing in areas that have growth potential and provide the highest return on the invested resource. We provide timely, accurate, complete, and understandable information to the public and our shareholders regarding our financial statements, strategies, investments, and risk profile.

5. Our Responsibilities to Our Suppliers/Business Partners

We act fairly and respectfully as expected from a good customer, showing the necessary care to fulfill our obligations on time. We carefully protect the confidential information of the individuals and organizations with whom we do business and our business partners.

6. Our Responsibilities to Our Competitors

We compete effectively only in legal and ethical areas, avoiding unfair competition. We support efforts aimed at ensuring a competitive structure in society.

7. Our Responsibilities to Society and Humanity

The protection of democracy, human rights, and the environment; education and charitable activities; and the elimination of crime and corruption are very important to us. With the awareness of being a good citizen, we act sensitively as a pioneer in social issues, trying to play a role in non-governmental organizations, public benefit services, and appropriate activities in these areas. We act sensitively to the traditions and cultures of Turkey and the countries where we carry out international projects. We do not give or accept bribes or gifts, products, and services of excessive value.

8. Our Responsibilities to Datacore

Our business partners, customers, and other stakeholders trust us because of our professional competence and integrity. We strive to maintain this reputation at the highest level. We provide our services within the framework of company policies, professional standards, our commitments, and ethical rules, showing the necessary dedication to fulfilling our obligations. We aim to work with customers, business partners, and employees who comply with the criteria of accuracy and legitimacy, and we avoid working with those who harm public morality, the environment, and public health. In public, in areas where the listeners think we are speaking on behalf of our company, we only express the views of our company, not our own. When we encounter complex situations that may put Datacore at risk, we consult the appropriate personnel, following the appropriate technical and administrative consultation procedures.

II. POLICIES SUPPORTING THE CODE OF BUSINESS ETHICS

A. Conflict of Interest Policy

It is essential for Datacore employees to avoid situations that may create a conflict of interest. The use of company resources, name, identity, and power for personal benefit and the avoidance of situations that could negatively affect the company's name and image are the primary responsibilities of all employees. The following implementation principles define the situations that may create a conflict of interest for company employees and the principles to be applied in such cases.

Implementation Principles

1. Activities That May Create a Conflict of Interest

All company employees must fully comply with the principles outlined below, which are defined as activities that may create a conflict of interest. Companies conduct the necessary work to encourage their employees to comply with these principles.

i. Engaging in Activities That May Create a Conflict of Interest

Employees should not enter into any business relationships, whether mutual or one-sided, with family members, friends, or other third parties that provide or receive benefits. For example, an employee with purchasing authority should avoid doing business with a supplier where a family member works. Exceptional cases are subject to the knowledge and approval of the Company Chairman of the Board. Similarly, company employees should be cautious about potential conflicts of interest due to close family members working at competing companies.

Employees cannot gain any commercial benefit, including trading shares in the stock market, by leaking any information belonging to the companies.

Datacore employees must not engage in activities that would require them to be considered "trader" or "merchant" directly or indirectly, nor should they work for another person or institution for a fee or similar benefit during or outside working hours. However, employees

may work for another person (family member, friend, other third parties) and/or institution for a fee or similar benefit outside working hours, provided that:

- It does not create a conflict of interest with their duties and other company practices,
- It does not cause incompatibility with other ethical rules and supporting policies,
- It does not negatively affect their duties at the company,
- Written approval from management is obtained.

For positions reporting to the General Manager, the opinion of the Ethics Committee following the opinion of the immediate manager and the Human Resources Manager is required, and approval is given by the General Manager.

Datacore employees cannot serve as board members or auditors in companies outside the group companies without the approval of the Company Board of Directors, nor can they work in competing companies or those with which the company has business relationships. Employees can work in non-profit organizations and universities for social responsibility and charity purposes, provided that it does not interfere with their duties at the company and with written approval from management.

Managers with hiring authority cannot employ their spouses, close relatives, and their relatives.

Employees can give speeches and write professional articles on subjects not related to the company and its activities and not contrary to its policies. The use of the company's name in such activities requires approval from the General Manager.

Datacore employees may participate actively in any political party on an individual and voluntary basis. Managers cannot ask their employees to engage in political activities or join a party. Employees' involvement in any political activity requires written approval from management and must meet the following conditions:

- Participation in political activities must not create a conflict of interest with their duties and other Datacore practices,
- Employees cannot engage in any political activity during working hours and cannot use their colleagues' time for such activities,
- Employees cannot use the company's name, position, title, and resources during their political activities.

Approval for political activities for employees, including positions reporting to the General Manager, is given by the General Manager following the opinion of the Ethics Committee and the Human Resources Manager.

Employees can make personal and voluntary material or moral donations and/or work for charitable organizations outside the company.

ii. Misuse of Position

Employees cannot use their authority for personal benefit or that of their relatives and cannot use it in a manner that would cause harm to the company.

Employees cannot gain personal benefits directly or indirectly from the company's purchasing and sales activities or from any transactions and contracts the company is involved in.

Employees cannot engage in behaviors and actions that are contrary to morality, law, and company discipline.

iii. Use of Resources

The use of resources for the company must consider the company's interests. The company's assets, resources, and personnel cannot be used outside the company under any name or for anyone's benefit without the company's interest. The principle of "savings in everything" is applied by all personnel.

Proper use of resources for the company's benefit also requires the proper use of time. Employees use their time efficiently during working hours and do not allocate time for personal matters during working hours. Managers cannot assign employees to personal tasks.

It is essential not to receive personal visitors during working hours. Employees must complete meetings with necessary visitors within a reasonable time related to the visit and without interrupting work flow.

iv. Relations with Other Persons and/or Organizations with Whom the Company has Commercial Relations

Employees cannot enter into personal business relationships, borrow money, or receive goods/services from the company's customers, subcontractors, suppliers, and other persons and/or organizations with whom the company has commercial relations, nor can they lend money or provide goods/services to such persons and/or organizations.

In relationships with customers, the following points should be considered: No transaction should be made without the customer's knowledge, even in favor of the customer, and no profit should be made by exploiting the customer's weaknesses, even in favor of the company. Customers cannot be given incomplete or incorrect information for profit purposes.

Company personnel cannot request or imply gifts from persons and/or organizations with whom the company has commercial relations, and they cannot accept any gift, money, check, property, free vacation, special discounts, etc., that would place the company under obligation. They cannot accept personal assistance or donations from anyone or organization with whom the company has business relationships. The Gift Acceptance and Giving Policy applies to this matter.

v. Relations with the Media

Relations with the media are conducted within the Company's Communication Protocol. Giving statements to any publication, conducting interviews, or participating as a speaker in seminars/conferences, etc., requires approval from the company's senior management. No personal gain can be made from these activities.

vi. Representing the Company

Any fees accrued for fulfilling duties representing the company in associations, employer unions, and similar non-governmental organizations are donated to the relevant institution or channels indicated by the institution.

Payments made to employees by third parties for seminar speaker fees or similar services are similarly donated to the relevant institution or channels indicated by the institution. These individuals can accept symbolic gifts, plaques, etc., given as mementos of the day.

B. Gift Acceptance and Giving Policy

It is essential for Datacore employees not to accept gifts or benefits that may affect their impartiality, decisions, and behaviors, nor to attempt to provide gifts or benefits that may create such effects to third parties and organizations. The following implementation principles regulate the gift exchanges between company employees and third parties and organizations with whom they have business relationships and define the principles to be applied in this regard.

Implementation Principles

1. Company employees are prohibited from accepting any benefit or gift, whether economic or non-economic, that affects or may affect their impartiality, performance, or decision-making while performing their duties.
2. Company employees can accept and/or give gifts and special treatments within the framework defined in article 3, provided that:
 - They are in line with the company's business goals,
 - They comply with the applicable legislation,
 - The acceptance of the gift by the public does not put the company in a difficult situation.
3. Provided that the conditions specified in article 2 are met:
 - Company employees can accept and offer entertainment, hospitality, and meals at acceptable standards in the business world, in accordance with the principles in the Authorization Table.
 - As representatives of the company, they can accept symbolic gifts, plaques, etc., given as mementos of the day in seminars and similar organizations.
4. In the situations mentioned above and other gifts, benefits, vacations, discounts, etc., provided that the conditions listed in article 2 are met, if the total value of gifts received from each calendar year and each giver is less than 200 TL, no approval is required.
5. It is prohibited to accept gifts or benefits that are implicitly or explicitly linked to a return.
6. Bribery and/or commission giving, receiving, or offering under any circumstances are strictly prohibited.
7. Company employees are prohibited from accepting money, travel expenses, event expenses, and similar payments free of charge or on loan from subcontractors, suppliers, consultants, competitors, or customers.
8. The gifts and promotional materials to be given by the company to customers, dealers, and other third parties with whom they have business relationships are approved by the company's senior management. No additional permission is required for the distribution of approved gifts and promotional materials.

9. The company can accept appropriate products and services as gifts and, with the knowledge and approval of the company's senior management, can give products or services as gifts suitable to the recipient's culture and ethical values.
10. In exceptional cases where local cultural values require reciprocal gift-giving above the company's policy, such gifts can only be accepted on behalf of the company and with the approval of the company's senior management. In any case, gift exchange should be conducted in accordance with local culture.

C. Protection of Confidential Information Policy

Information is one of the most important assets Datacore will use to realize its vision. Therefore, the effective use, proper sharing, and ensuring the confidentiality, integrity, and accessibility of information in this process are the common responsibilities of all our companies and employees. The management systems and processes established for the management and confidentiality of information in our companies must be in harmony with each other to maximize the benefit to the group. The details of the practices related to this issue are included in the Datacore Information Security Policy and related documents.

The following implementation principles define confidential information for companies and regulate the principles that employees must adhere to concerning confidential information.

Implementation Principles

Confidential Information includes, but is not limited to, any written, graphic, or machine-readable information such as intellectual property rights (e.g., trademarks), innovations made by employees, data, printed communication materials, processes, advertising, product packaging and labels, plans (marketing, product, technical), business strategies, strategic partnerships, financial information, personnel information, customer lists, product designs, know-how, specifications, the identity of potential and actual customers, and supplier information.

The principles that must be adhered to regarding confidential information are listed below:

1. This information cannot be disclosed to third parties unless required by official authorities and legislation.
2. This information cannot be altered, copied, or destroyed. Necessary measures are taken to keep the information carefully, store it, and prevent its disclosure. Changes made to the information are recorded with its history.
3. Confidential files cannot be taken out of the institution. For confidential information that needs to be taken out, approval must be obtained from the information's responsible person or senior management.
4. Passwords, user codes, and similar identifying information used to access company information must be kept confidential and not disclosed to anyone other than authorized users.
5. Company confidential information should not be discussed in public places such as dining halls, cafeterias, elevators, shuttle buses, and similar places.
6. Confidential information is classified according to confidentiality levels, which are clearly stated in the information's content. Employees must be aware of the confidentiality levels of the information obtained during their duties and act accordingly. In case of doubt about the confidentiality level, the highest level of

confidentiality should be applied, and the opinion of the relevant manager should be obtained if necessary.

7. If information sharing with third parties is necessary for the company's benefit, a confidentiality agreement must be signed before sharing or a written confidentiality commitment must be obtained from the other party to guarantee the security and protection of the shared information.
8. False statements and/or rumors about individuals or institutions are not allowed.
9. Personnel-related information reflecting company policy, such as salaries, fringe benefits, and other personal information, is confidential and cannot be disclosed to anyone other than authorized persons. Personnel information is sent personally to the individual. It is strictly prohibited for personnel to disclose this information to others or to pressure other employees to disclose such information.

D. Creating and Maintaining a Fair Working Environment Policy

Datacore considers creating and maintaining a fair working environment for employees as one of its top priorities. The aim is to increase employee success, development, and commitment by creating a fair, respectful, healthy, and safe working environment that complies with all relevant laws and regulations. The following implementation principles define the fundamental principles related to creating and maintaining a fair working environment in the company.

Implementation Principles

1. Company practices related to employment and working life comply with all relevant laws and regulations. Company employees must also fulfill all legal requirements within the scope of their activities and act in accordance with legal regulations.
2. Datacore's human resources policies and practices ensure fairness in all applications, including hiring, promotion-transfer-rotation, compensation, rewards, social rights, etc.
3. Discrimination based on language, race, color, gender, political opinion, belief, religion, sect, age, physical disability, and similar reasons is not accepted among employees within the institution.
4. A positive and harmonious working environment is created, and conflict environments are prevented, ensuring that individuals with different beliefs, thoughts, and opinions can work together in harmony.
5. Employees' private lives and personal areas are respected.
 - Communications between individuals cannot be violated by others.
 - Even if recorded in accordance with the law, it is prohibited to give, distribute, or obtain personal data illegally.
 - Personnel information necessary due to the nature of the business relationship is not used for purposes other than its original intent and is not shared with third parties without the individual's consent.
 - The private and family life of all employees is respected.
6. Employees' inviolability, including physical, sexual, and emotional integrity, is protected.

- Any form of violation of employees' inviolability through physical, sexual, and/or emotional harassment at the workplace or any location due to work is against the law and ethical rules and will not be tolerated by the company. The aim of this practice is to ensure that employees work in an environment where their physical, sexual, and emotional integrity is protected.
 - Any behavior defined as sexual harassment, including the violation of an individual's bodily integrity through sexual actions and/or sexual harassment without physical contact, is prohibited.
 - Negative behavior towards individuals who complain or report harassment or assist during an investigation is also not tolerated.
7. No employee can request or show special treatment based on different gender, religion, language, or race. Privileged applications based on differences in gender, religion, language, or race are not accepted.
 8. The physical working environment and conditions of the workplace are ensured to be healthy and safe for all employees.

III. APPLICABLE LEGISLATION

Due to Datacore's activities in both national and international markets, company operations may be subject to different country laws and regulations. When there are questions about business ethics in different countries, the regulations established in the country where the business is conducted should be followed first. If compliance with the regulations of the country and/or countries where the business is to be conducted creates problematic results in terms of Datacore's adopted ethical values, we should try to find solutions within the framework of our ethical rules and procedures.

IV. RESPONSIBILITIES OF EMPLOYEES

The Code of Business Ethics and related policies and procedures have clearly defined the ethical rules regarding how we should behave and conduct our work. Compliance with these rules is the primary responsibility of all employees. In this regard, all Datacore employees are responsible for:

- Acting in accordance with laws and regulations under all circumstances,
- Reading the Datacore Code of Business Ethics, knowing, understanding, internalizing, and complying with the rules, principles, and values stated within,
- Learning the general and specific policies and procedures applicable to their work,
- Consulting their manager and human resources regarding potential violations concerning themselves or others,
- Reporting potential violations by themselves or others immediately; reporting such issues in writing or verbally to their manager, human resources, and/or the Ethics Committee, either anonymously or not,
- Following the "Decision-Making Methods and Ways to Be Followed from an Ethical Perspective" defined to assist in acting in accordance with the rules and solving problems,
- Cooperating with the Ethics Committee in ethical investigations and keeping the information related to the investigation confidential.

A. Decision-Making Methods and Ways to Be Followed from an Ethical Perspective

When making a decision, you should follow the steps below and ask yourself these questions as a guide:

1. Identify the Event, Decision, or Problem

- Are you being asked to do something you think might be wrong?
- Are you aware of a situation in the company or your business partners that may potentially be illegal or unethical?
- Are you trying to make a decision and are unsure how to act in accordance with business ethics?

2. Think Before Deciding

- Try to clearly identify and summarize the problem or question.
- Ask yourself why there is a dilemma.
- Consider the options and their consequences.
- Think about who might be affected.
- Consult others.

3. Decide on an Action Plan

- Determine your responsibilities.
- Review all relevant facts and information.
- Refer to applicable company policies, procedures, and professional standards.
- Assess the risks and think about how you can mitigate them.
- Try to develop the best action plan.
- Consult others.

4. Test Your Decision

- Review the questions that need to be asked from an ethical perspective.
- Review your decisions within the framework of the company's core values.
- Ensure that you have considered company policies, laws, and professional standards.
- Consult others and consider their views within your planned action.

5. Proceed with Determination

- Share your decision with the relevant people along with your justifications.
- Share what you have learned.
- Share your success story with others.

B. Four Basic Questions to Consider

1. Is this activity/behavior in compliance with laws, rules, and traditions? (Standards)
 - Is it in compliance with professional standards?
 - Is it in compliance with laws?

2. Is this activity/behavior balanced and fair? Would we be uncomfortable if a competitor (another) did this? (Sense of justice)
 - Do you think it is right?
3. Would our company and stakeholders be uncomfortable if the details of this activity were made public? (Feelings and ethical values)
 - Would you be embarrassed or uncomfortable if others knew you were engaging in this behavior?
 - Could it have negative consequences for you or your company?
 - Who else might be affected by this (other employees within the company, you, shareholders, etc.)?
4. To what extent does the "perceived truth" align with the "objective truth"?
 - How would it be portrayed in the newspapers?
 - What would a reasonable person think under the same conditions?

V. RESPONSIBILITIES OF MANAGERS

Datacore managers have additional responsibilities beyond the responsibilities defined for employees within the framework of the Code of Business Ethics. Accordingly, managers are responsible for:

- Creating and maintaining a company culture and working environment that supports ethical rules,
- Setting an example through their behavior in the implementation of ethical rules, educating their employees about ethical rules,
- Supporting employees in reporting questions, complaints, and notifications about ethical rules,
- Guiding employees when consulted on what needs to be done, considering all notifications and referring them to the Ethics Committee as soon as necessary,
- Structuring the business processes under their responsibility in a way that minimizes ethical-related risks and implementing necessary methods and approaches to ensure compliance with ethical rules.

VI. RESPONSIBILITIES OF ETHICAL RULE ADVISORS

Ethical Rule Advisors are responsible for:

- Providing guidance and advice to employees on ethical issues,
- Referring unresolved or investigation-required non-compliances within the company to the Ethics Committee,
- Contributing to the resolution of internal ethical non-compliances as requested by the Ethics Committee,
- Regularly or upon request reporting the questions and non-compliances related to ethics received from employees to the Ethics Committee with their outcomes,
- Being the contact person within the company for the Ethics Committee's investigations and providing necessary support during investigations,

- Monitoring and following the effectiveness of the business ethics practices carried out in the company and providing support in their implementation.

VII. OTHER RESPONSIBILITIES

- The company's senior management is responsible for ensuring the effective implementation of the company-specific Code of Business Ethics they may create within this framework and for establishing a culture that supports it.
- The Code of Business Ethics and all related policies are reviewed, revised, and documented by Human Resources with the recommendations of the Ethics Committee and announced to the companies with the approval of the Chairman of the Company Board.
- Human Resources is responsible for:
 - Informing employees about the Ethical Rules, providing training at regular intervals to ensure the clarity of policies and rules, and maintaining constant communication on this issue with employees,
 - Ensuring that new hires read the ethical rules and are informed about them,
 - Ensuring that all employees renew their notifications by signing the Business Ethics Compliance Form at the beginning of each year.
- Company managements, in cooperation with the Ethics Committee, are responsible for:
 - Guaranteeing the confidentiality of complaints and notifications made within the framework of ethical rules and protecting individuals after notifications,
 - Ensuring the job security of employees who report,
 - Guaranteeing that complaints and notifications are investigated timely, fairly, consistently, and sensitively, and taking necessary actions decisively in case of violations.

VIII. RESOLVING NON-COMPLIANCES WITH ETHICAL RULES

Those who violate the Code of Business Ethics or company policies and procedures will be subject to various disciplinary actions, up to and including termination of employment. Disciplinary actions will also apply to those who approve, direct, or fail to report inappropriate behavior and actions that cause rule violations.

A. Ethics Committee

The Ethics Committee is responsible for investigating and resolving complaints and notifications regarding the violation of ethical rules within the scope of the Datacore Code of Business Ethics. The Ethics Committee, which operates under the Chairman of the Board of Datacore Information Systems Ind. and Trade Inc., consists of 3 people: 1 Chairman and 2 Members.

B. Working Principles of the Ethics Committee

The Ethics Committee conducts its work within the following principles:

- Keeps the identities of the individuals making notifications or complaints confidential.
- Conducts the investigation as confidentially as possible.

- Has the authority to directly request information, documents, and evidence related to the investigation from the relevant unit. It examines all obtained information and documents solely within the scope of the investigation.
- The investigation process is documented from the beginning. Information, evidence, and documents are appended to the record.
- The record is signed by the chairman and members.
- The investigation is handled urgently, and the result is reached as quickly as possible.
- Decisions made by the committee are immediately implemented.
- Relevant departments and authorities are informed about the result.
- The chairman and members of the committee perform their duties independently and without influence from the hierarchy within the organization. They cannot be pressured or influenced regarding the issue.
- If deemed necessary, the committee may seek expert opinions and benefit from experts without violating the principle of confidentiality during the investigation.

For questions and notifications, you can use the following email and postal addresses or directly contact the Ethics Committee members. Email: etik@datacore.com.tr

Postal: Datacore Information Systems Ind. and Trade Inc. Attention: Ethics Committee
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Phone: 216-413 82 82 (Working hours: Weekdays 09:00-12:00 and 13:00-18:00)