



## ETHICAL COMPLIANCE PRINCIPLES

### 1- RESPONSIBILITIES TO COMPETITORS

1.1.Nuh Group Companies; competes with rival sector companies on the basis of ethical principles, within the framework of Competition Law Rules and respect.

1.2.Respects the patents, copyrights and intellectual property of competing industry companies. It refrains from price fixing and all Other monopolistic activities that create unfair competition. Fights against business and transactions aimed at limiting competition.

1.3. Employees may collect, share and use information about competing companies that is publicly available and available in the market. However, it is ensured that these are only done with a legal and ethical understanding. Information gathering activities through prohibited methods (entering private property, eavesdropping on conversations, wiretrapping, hacking, invasion of privacy policy it applies to its own non-public information within the Scope of information obtained from rival companies.

1.3. As in the Competition Law Rules in force in our country, it competes in compliance with the laws of all countries in which it operates and on an ethical basis, with respect to rival sector companies.

### 2- WHISTLEBLOWER PROTECTION

2.1. Including, but not limited to, unlawful behavior by employees (Financial corruption or impropriety or fraud, non-compliance with legal obligations or applicable laws, Human Rights violations – including health and safety and child labor hazards – serious damage to the environment, criminal activities, improper treatment, etc.) Other activities) or business ethics non-compliance is detected, it is encouraged to notify the company via the e-mail address [etik@nuhcimento.com.tr](mailto:etik@nuhcimento.com.tr) created within the scope of Ethical Compliance.

2.2. The notification made by the employees can only be accessed by the Human Resources Manager and it is decided whether or not it will be subject to ethical review. If deemed necessary during the evaluation phase, the opinions of the Human Resources Director, Chairman of the Board of Directors, CEO and Other senior executives may be sought. The results of the Ethics Review are evaluated by the Ethics Committee, which consists of the “CEO, HR Director, HR Manager and the relevant unit Director”.



2.3. Employees who report violations of laws and ethical rules in good faith and raise their concerns are encouraged by the Company to keep their identities confidential. The reporting employee is prevented from facing any retaliation (any act of adverse employment, including discrimination, demoting, dismissal, forfeiture, threats or harassment).

2.4. The company will protect and employee who honestly raises a concern, but knowingly making a false accusation, lying to investigator, or refusing to cooperate is a violation of the code of ethics. Reporting honestly does not mean that the employee must be right; It is sufficient to simply believe that the information given is correct.