

ASTOR ENERJİ A.Ş.**INSTRUCTION FOR CODE OF ETHICS AND PRACTICE****1. PURPOSE:**

The purpose of this instruction is that the personnel of the company are informed of and comply with ethical rules.

2. SCOPE:

This instruction covers all Astor Energy INC. personnel.

3. RESPONSIBLE:

All Astor Energy INC. personnel are responsible for the application of this instruction.

4. APPLICATION:**4.1 WHAT IS ETHICS?**

Ethics is distinguishing between right and wrong, rightful and wrongful, good and bad, just and unjust, and doing what we believe to be right, rightful, good and just.

Ethics talks about morality, questions, discusses, thinks, judges. Ethics are universally accepted rules.

4.1.1 When Does Ethics Appear?

When faced with conflicting situations between our interests and our moral principles, we find it difficult to make decisions.

In such cases, we have to make a decision by putting all our value judgments before us.

We know that if we systematically address and resolve conflicts, we will not have difficulty defending ourselves and our decisions when necessary in the future.

We don't have to start from scratch every time we encounter a new problem.

4.1.2 A Method Against Ethical Problems!

Arne Vesilind proposes an 8-step method that we can use if we encounter ethical problems, whether in our personal or professional life:

1. Consider all relevant information and events together.
2. Define what is the moral problem that is troubling you.
3. List who will be affected by your decision.
4. Consider if you have any other options.
5. Consider what impact each option would have if followed (include what happens if everyone else did that).
6. Calculate the individual cost of each option (the price to be paid may be monetary, reputation or self-confidence).
7. Is there anyone you trust and respect that you can take the above information with you and apply to them and ask their opinion?
8. Put all these together and formulate the behavior you can choose.

4.1.3 The Most Important Tip to Help You When Choosing Ethical Behavior (Golden Secret Rule) is as follows:

- Ask yourself what you intend to do.
- “Will you be happy when your colleagues, friends and family find out about this?”
- If the result of this internal debate will make you happy, do that.



4.2 ETHICAL CODE OF CONDUCT REQUIRED FOR EMPLOYEES:

Expectations from employees are listed below:

- Always abide by the laws.
- Perform duties within the framework of basic moral and human values.
- To act in a fair, well-intentioned and understanding manner in order to provide mutual benefit in all relations.
- Not to make any unfair profit from individuals and organizations for any purpose, not to take or give bribes.
- To act in accordance with the relevant company policies and applicable legislation in the ongoing duties.
- Not to make any behavior, declaration or correspondence that will leave the company under commitment, unless explicitly authorized.
- Not to conduct any behaviors that will disturb and/or cause harm to other employees, not to interfere with work compliance.
- To take care of all tangible and intangible assets, including the information and information systems of the company, as if they were personal property, to protect them against possible loss, damage, misuse, theft and sabotage.
- Not to use working time and company resources directly or indirectly for personal interests and/or political activities.

4.3 ASSET AND INFORMATION MANAGEMENT

4.3.1 Intellectual Property Rights

- To protect the intellectual property rights of the company, to report in case of any infringement.
- Avoiding -intentionally- unauthorized use of patents, copyrights, trade secrets, trademarks, computer programs or other intellectual and industrial property rights of other companies.

4.3.2 Information Management

- To ensure that all legal records are kept in a proper manner.
- Not responding to information requests from third parties, which are classified as confidential for the company, without the approval of the senior management.
- To show the necessary meticulousness to ensure that the statements and reports made by the company comply with the truth.

4.3.3 Security and Crisis Management

- To take necessary measures to protect company employees, information and information systems, factories and administrative facilities against possible terrorism, natural disasters and malicious attempts.
- To make the necessary crisis planning regarding the emergency crisis management to be created in case of terrorism, natural disasters, etc., to ensure the continuity of the business with minimum loss in the event of a crisis.
- To take every precaution to prevent the theft or loss of company assets.



4.3.4 Confidentiality

- To act with the awareness that the financial and trade secrets of the company, information that will weaken the competitiveness of the company, personnel rights and information, agreements with business partners are within the framework of "confidentiality", and to ensure their protection and confidentiality.
- Not to share the information learned from work and the documents obtained with unauthorized persons and authorities inside and outside the institution for any purpose, not to use them for speculative purposes (directly or indirectly).
- Not to use non-public information about the companies they work with and their customers and other people and companies with which they work for purposes other than the stipulated purpose, and not to share them with third parties without a waiver.

4.4 EXAMPLES OF UNETHICAL BEHAVIOR

- **EXAMPLE 1:** Making the customer pay for a service or good that he/she has not received.
- **EXAMPLE 2:** Manipulating business results in order to make them look different from what they are.
- **EXAMPLE 3:** Abusing relations with company collaborations.
- **EXAMPLE 4:** Abusing company resources.
- **EXAMPLE 5:** Doing business outside.
- **EXAMPLE 6:** To act in favor of relatives.

4.5 CODES OF PRACTICE

This instruction is complementary to the entry documents communicated to the personnel by Astor Energy A.Ş. at the start of employment. It is prepared in two copies and one copy is given to the employee. A signed copy of the employee is kept in the personnel file.

The top management of the company unconditionally accepts that the behavior examples in this instruction harm the company and ensures that the necessary actions are taken to prevent it from being repeated.

