



CODE OF ETHICS AND IMPLEMENTATION PRINCIPLES

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JMS MACHINERY INDUSTRY AND TRADE INC

CODE OF ETHICS AND IMPLEMENTATION PRINCIPLES

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1 Introduction

Our Company is committed to achieving customer satisfaction by delivering products and services that meet internationally recognized quality standards through the efficient use of limited natural resources, while contributing to economic and social development. In doing so, we strive to become a symbol of reliability, sustainability, and reputation for our customers, employees, suppliers, and all other stakeholders at both national and global levels.

Our Code of Ethics is based on the following principles:

- Our customers are our top priority.
- Striving for excellence is our indispensable objective.
- Our people are our most valuable asset.
- Our goal is to create resources that enable continuous improvement and sustainable growth.
- We aim to contribute to the strength of the national economy from which we derive our strength.
- We are committed to the highest standards of business ethics and integrity.

The Code of Ethics has been established to provide guidance to all employees and individuals acting on behalf of the Company in making decisions and demonstrating appropriate conduct while carrying out their duties.

All employees are expected to demonstrate attitudes and behaviors that uphold the integrity of the Company's culture and to protect and enhance the Company's reputation and the credibility of its corporate structure.

Compliance with the Code of Ethics is mandatory for all employees.

All stakeholders are expected to comply with the principles of business ethics and all implementation principles that support these rules.

Communicating the Code of Ethics to all employees, ensuring that employees recognize the importance of these rules, and demonstrating the necessary leadership and commitment to promote compliance with the Code of Ethics are among the primary duties and responsibilities of employees in managerial positions.

The employee's immediate supervisor is responsible for documenting that the employee has read, understood, and committed to complying with the latest version of the Code of Ethics and Implementation Principles.

2 Employee Relations

Our Company aims to become the employer of choice, bringing together highly qualified and competent professionals who create added value for sustainable growth, and fostering a workplace where everyone is proud to belong.

Our Company values its employees and respects their rights. In this context, we are committed to:

- Recruiting and employing individuals based solely on their qualifications and suitability for the position, while ensuring equal employment opportunities without discrimination.
- Attracting highly qualified young talent and experienced professionals who will contribute to the Company's continued success.
- Making the best possible use of employees' talents, skills, and creativity.
- Providing equal opportunities for the training, development, and career advancement of employees.
- Recognizing and rewarding performance through fair and competitive compensation policies, as well as effective and objective performance evaluation systems.
- Strengthening employee commitment to the Company by ensuring equal opportunities for promotion and recognition.
- Maintaining a harmonious and respectful working environment.
- Providing employees with a clean, healthy, and safe workplace where all necessary occupational health and



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safety measures are implemented.

- Creating and sustaining a work environment that promotes transparency, mutual respect, collaboration, and teamwork.
- Maintaining a zero-tolerance policy toward any form of harassment in the workplace.
- Considering and responding to employees' opinions and suggestions, and implementing measures that enhance employee motivation.
- Protecting employees' personal information and not disclosing it to third parties without the employee's knowledge and consent, except where required by law.
- Respecting human rights.

These principles form the foundation of our relationships with employees.

3 External Relations

The fundamental principles governing our Company's relationships with its stakeholders are set out below.

3.1. Stakeholder Relations

- Representing our Company in a manner that enhances its reputation and public image.
- Maintaining open channels of communication with stakeholders, taking their feedback and suggestions into consideration, and fostering positive and constructive relationships.
- Refraining from expressing personal opinions when communicating with the public on behalf of the Company.

3.2. Shareholder Relations

- Protecting the legal rights and interests of our shareholders.
- Making every effort to create value in return for the resources provided by our shareholders, and allocating generated profits either through distribution to shareholders or reinvestment in the Company.
- Ensuring that all information required to be disclosed regarding the Company is communicated to shareholders and the public in a complete, accurate, and timely manner.
- Managing the Company in accordance with its enduring principles of trust and integrity, while pursuing sustainable growth and profitability and utilizing its resources, assets, and working time efficiently.

3.3. Government Relations

- Complying with all applicable laws, regulations, and legal requirements in the countries where the Company operates or intends to operate.
- Managing, recording, and reporting all business activities and accounting processes fully and accurately in accordance with applicable legal requirements.

3.4. Social Responsibility

- Supporting initiatives that contribute to economic and social development,
- Demonstrating sensitivity to issues of public concern and supporting the positive development of society,
- Encouraging all employees to contribute to the development and well-being of the communities in which we operate.



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3.5. Customer Relations

- Creating value for our customers by meeting their needs and expectations at the highest possible level.
- Providing high-quality products and services while maintaining consistent business practices.
- Building long-term relationships with customers based on trust.
- Building long-term relationships with customers based on trust.
- Providing customers with accurate, complete, and transparent information at all times.

3.6. Supplier and Customer Relations

- Creating mutual value in business relationships with suppliers and customers.
- Maintaining open, direct, and honest communication with suppliers and customers.
- Maintaining open, direct, and honest communication with suppliers and customers.
- Complying with reasonable confidentiality requirements and occupational health and safety rules requested by suppliers during supplier audits and site visits.

3.7. Competitor and Competition Relations

- Refraining, under any circumstances, from entering into agreements or engaging in concerted practices with competitors or other individuals or organizations that have the purpose or effect, or may have the effect, of preventing, restricting, or distorting competition beyond the limits permitted by applicable laws and regulations, whether directly or indirectly.
- Not abusing a dominant market position, whether held individually or jointly with other undertakings.
- Refraining from discussions or exchanges of information with competitors aimed at determining market conditions and/or competitive practices.
- Avoiding any discussions, communications, or activities that could give rise to, or be perceived as giving rise to, the situations described above during meetings of associations, chambers of commerce, professional organizations, councils, or any other business or professional gatherings attended on behalf of the Company.

3.8. Global Responsibility

- Developing environmental policies and ensuring their effective implementation.
- Acting in accordance with the principles of the United Nations Global Compact, contributing to the well-being of our country and the global community, and demonstrating responsible corporate citizenship together with our employees, dealers, suppliers, and authorized service providers.

4 Code of Ethical Conduct for Employee

Maintaining and further strengthening our Company's reputation for professionalism, integrity, and trust is the primary responsibility of all employees. In this regard, all employees are expected to:

- Comply with all applicable laws and regulations at all times.
- Perform their duties in accordance with fundamental ethical values and principles of human dignity.
- Act fairly, in good faith, and with respect in all relationships, with the aim of creating mutual benefit.
- Never seek or obtain any improper benefit from individuals or organizations for any reason, and neither offer nor accept bribes.



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- Perform all duties in compliance with applicable business ethics principles and all implementation principles that support them.
- Not make any commitment, statement, or correspondence on behalf of the Company unless expressly authorized to do so.
- Refrain from any conduct that may disturb, intimidate, or harm other employees, or disrupt workplace harmony.
- Exercise the same level of care in protecting all tangible and intangible Company assets, including information and information systems, as would be exercised in protecting one's own property, and safeguard them against loss, damage, misuse, abuse, theft, and sabotage.
- Not use working time or Company resources, directly or indirectly, for personal benefit or for political activities or interests.

4.1. Asset and Information Management

4.1.1. Intellectual Property Rights

- Ensuring that all necessary legal procedures are initiated and completed in a timely manner to secure the intellectual property rights of newly developed products, processes, and software.
- Refraining from the unauthorized use of patents, copyrights, trade secrets, trademarks, computer software, or any other intellectual and industrial property rights belonging to third parties.

4.1.2. Information Management

- Ensuring that all legally required records are maintained accurately and properly.
- Not responding to requests from third parties for information classified as confidential to the Company without prior approval from senior management.
- Exercising due diligence to ensure that all statements and reports issued by the Company are accurate, complete, and truthful.

4.1.3. Security and Crisis Management

- Taking all necessary measures to protect employees, information and information systems, as well as manufacturing and administrative facilities against potential terrorist acts, natural disasters, and other malicious threats.
- Developing appropriate crisis management and business continuity plans for emergency situations, including terrorism, natural disasters, and similar events, to ensure business continuity with minimal disruption.
- Taking all necessary precautions to prevent the theft, damage, or misuse of Company assets.

4.1.4. Confidentiality

- Recognizing that the Company's financial and commercial secrets, information that could weaken its competitive position, employees' personal information and rights, and agreements with business partners are confidential, and ensuring that such information is adequately protected and kept confidential.
- Not disclosing information obtained or documents accessed in the course of work to any unauthorized person or authority, whether inside or outside the Company, for any purpose whatsoever, and not using such information, directly or indirectly, for speculative purposes.
- Not using any non-public information relating to the Company, its customers, or other individuals or organizations with which it conducts business for any purpose other than its intended business purpose, and not disclosing such information to third parties without obtaining the necessary authorization.



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4.2. Avoiding Conflicts of Interest

A conflict of interest refers to any situation that affects, or may appear to affect, an employee's ability to perform their duties impartially, or in which an employee, their relatives, friends, or individuals or organizations with whom they have a relationship obtain any form of benefit, financial interest, or personal advantage.

4.2.1. Refraining from Acting for Personal or Relatives' Benefit

Employees are required to disclose, upon joining the Company, any ownership interest, shareholding, or participation in the investments of another company. This matter shall be specifically addressed during the recruitment and interview process. Employees are also required to promptly inform their immediate supervisor of any subsequent changes to such interests, as well as any other circumstances that may give rise to, or be perceived as, a conflict of interest. Such disclosures shall be escalated through the management hierarchy to at least two levels above the employee's immediate supervisor.

- Not using one's position or authority to obtain any improper benefit for oneself, relatives, or third parties.
- Ensuring that personal investments do not create, or appear to create, a conflict of interest with the Company.
- Ensuring that personal investments or any activities outside the scope of employment do not interfere with the time, attention, or commitment required to perform assigned duties, and avoiding any circumstances that may distract from primary job responsibilities.
- Informing the immediate supervisor if an employee has a first-degree relative who holds a primary decision-making position related to the same business activities at a customer or supplier organization.
- Informing the immediate supervisor upon becoming aware that a relative holds shares in, or has a financial interest in, a company that maintains a business relationship with the Company.

4.2.2. Participation in Representation and Corporate Events

Participation in sporting events, domestic or international trips, or similar invitations organized by individuals or organizations with which the Company has, or may potentially establish, a business relationship—other than conferences, receptions, promotional events, seminars, or similar events that are open to the general public—where such participation could influence, or be perceived to influence, business decisions, is subject to the prior approval of the General Manager.

4.2.3. Giving and Receiving Gifts

In conducting relationships with private or public individuals and organizations that seek to establish or maintain a business relationship with the Company:

- Employees shall neither offer nor accept any gift, other than those given in accordance with accepted business customs and practices or those of a symbolic or promotional nature, if such gifts may create the appearance of impropriety, give rise to a relationship of obligation, or be perceived as doing so.
- Employees shall not request, offer, or accept any discount, benefit, or other advantage from suppliers, dealers, authorized service providers, customers, Group companies, or third parties if such benefit could be perceived as inappropriate.

4.2.4. Business Relationships with Former Employees

Employees who leave the Company and subsequently establish their own business or become partners in another company to conduct business with the Company as a supplier, contractor, consultant, agent, distributor, or in any similar capacity may create the perception of a conflict of interest. Such situations require particular attention.

Before, during, and after such business relationships, all parties shall act in the best interests of the Company, comply with ethical standards, and ensure that no actual or perceived conflict of interest arises.

Where a supplier is in such a position, the responsible manager shall contact the Company where the supplier was previously employed, verify that no inappropriate circumstances exist, prepare a report documenting the findings, and inform their immediate supervisor.

If any inappropriate situation or conflict of interest is identified, no business relationship shall be established with the individual concerned.



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4.2.5. Insider Trading

Employees must recognize that using any confidential information belonging to the Company, or disclosing such information to third parties, for the purpose of obtaining any commercial or personal benefit constitutes insider trading, which is a criminal offense under applicable law, and must never engage in or attempt to engage in such activities.

5 Occupational Health and Safety

Our Company is committed to ensuring the highest standards of occupational health and safety in the workplace and throughout all work-related activities.

- Employees shall comply with all occupational health and safety rules, procedures, and instructions established for this purpose and shall take all necessary precautions.
- Employees shall not possess or bring into the workplace any illegal item or substance, or any item or substance that may pose a risk to the workplace and/or to the health and safety of employees.
- Except for medication prescribed by a licensed physician, employees shall not possess or use narcotics, addictive substances, or any substances that may impair or eliminate their mental or physical abilities in the workplace, nor shall they perform any work while under the influence of such substances.

6 Prohibition of Political Activities

The Company does not make contributions or donations to political parties, politicians, or political candidates. Political demonstrations, campaigning, propaganda, or any similar activities are not permitted on Company premises. Company resources, including vehicles, computers, e-mail systems, and other Company assets, shall not be used or allocated for political purposes or activities.

7 Implementation Principles of the Code of Ethics

7.1. Obligation to Report Violations

Employees are required to report any known or suspected violation of the Code of Ethics or any applicable laws and regulations to which the Company is subject to their immediate supervisor or, where appropriate, to a Senior Manager and/or the General Manager.

The identity of the reporting individual and the information provided shall be treated as confidential. Disclosure of such reports to third parties in a manner that could adversely affect workplace harmony or business relationships shall be strictly prohibited.

The reporting mechanism shall be used solely in the best interests of the Company.

Individuals submitting a report must act in good faith and must not use the reporting mechanism to spread rumors, damage the reputation, or adversely affect the career of the person being reported. Accordingly, confidentiality, objectivity, and compliance with ethical principles are essential throughout the reporting and investigation process. Both the reporting individual and those responsible for managing the investigation are required to exercise the highest level of care and diligence in handling such matters.

Customers, suppliers, and other interested parties who become aware of, or suspect, a violation of the Code of Ethics or any applicable laws and regulations to which the Company is subject may submit a report via e-mail at etik@jamak.com.tr. All reports will be handled confidentially and will be reviewed and assessed by the Ethics Committee in accordance with the established investigation and evaluation procedures. Any report that is intentionally false, misleading, or defamatory shall be considered a violation of the Code of Ethics.



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7.2. Ethics Committee

The Ethics Committee shall be responsible for evaluating alleged violations of the Code of Ethics, determining appropriate disciplinary actions where necessary, and ensuring consistency in the implementation of ethical standards throughout the Company.

The Ethics Committee shall consist of the following members:

- General Manager (Chairperson of the Company's Ethics Committee)
- Deputy General Manager
- Finance and Administrative Affairs Manager
- Quality Assurance Manager
- Human Resources Officer (Secretary of the Company's Ethics Committee)

7.3. Disciplinary Measures

The following disciplinary measures shall apply in the event of a violation of the Code of Ethics:

- Where misconduct is determined to have been committed intentionally, disciplinary action up to and including termination of employment shall be taken in accordance with the applicable provisions of labor legislation. Where deemed appropriate, legal proceedings may also be initiated. (An employee who has intentionally obtained an improper benefit may not rely, in whole or in part, on previous contributions or achievements as grounds for mitigation or exemption from disciplinary action.)

Where no misconduct is identified, or where the incident results from negligence or lack of knowledge, an appropriate verbal or written warning shall be issued, taking into account the severity and impact of the incident.

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