



Code of Business Ethics and Conduct

1.MANAGER'S MESSAGE





Dear Team Members and Business Partners,

As a leading company in turnstile manufacturing, our aim is not only to stand out with technological innovations in the industry but also with strong business ethics and professionalism standards. In this context, it is crucial for each of us to remember our responsibilities as representatives of our company and to apply these values at every level.

As the Tansa family, we embrace the principles of honesty, transparency, responsibility, and fairness as the foundation of our business. These values are reflected in our approach to our customers and business partners, the quality of our products, and every stage of our business processes.

Therefore, we invite you to carefully review the Company's Code of Business Ethics and Conduct and apply these rules in your daily work. These rules aim not only to comply with legal requirements but also to protect mutual respect, equality, and integrity. Compliance by each of us will lay the foundation for our company's long-term success and reputation in the industry.

We have channels where you can safely report any ethical concerns or violations you encounter. As the management team, we take such reports seriously and take all necessary steps.

Remember, each of us is an ambassador for protecting the values and reputation of our company. Together, we can build a fair and respectful business world, not just for today but for future generations.

We thank you for your commitment and excellence on this journey and wish to reach higher in ethics and professionalism together.

Sincerely,

Mehmet Yalçın Sarı & Mete Tansal Akçaylı

2.DEFINITIONS





“Donation” refers to providing financial or in-kind support to individuals or organizations, typically working for the public benefit such as associations, educational institutions, healthcare services, and cultural organizations. This support aims to increase the general welfare of the community without any expectation of material return.

“Conflict of Interest” is defined as a situation that prevents employees from performing their duties impartially, involving potential benefits to themselves, their relatives, friends, or the interests of entities and institutions they are involved with, mixed with the interests of the company.

“Ethics” is a concept that identifies the difference between right and wrong and entails the responsibility to do what is right. Ethics form the foundation of individuals’ and institutions’ behaviors and decisions, incorporating values like honesty, justice, respect, and responsibility.

“Ethics Hotline” is a communication channel where employees or other stakeholders can report all unethical or illegal behaviors within or outside the Company.

“Ethics Committee” is a body within the Company responsible for establishing, monitoring, and implementing ethical standards.

“Confidential Information” refers to all financial, strategic, or technical data that is proprietary to the Company and not disclosed to third parties.

“Stakeholder” refers to all parties (shareholders, employees, customers, suppliers, business partners, etc.) that the Company is involved with.

“Bribery” is when an individual provides material or intangible benefits to another person in an illegal or unethical manner related to their duties, directly or indirectly, for personal gain.

“Sponsorship” means the allocation of company financial or other resources to support a specific event, project, or initiative; this usually involves a mutually beneficial relationship aimed at enhancing the company’s brand value and social image.

“Irregularity” refers to an act, process, or activity not conducted or carried out according to proper procedures or legal requirements.

“Corruption” is the misuse of authority derived from one’s position for personal gain or the benefit of another, directly or indirectly.

“The Board of Directors” consists of the company’s main shareholders and externally appointed independent members.

3. INTRODUCTION





The purpose of the Code of Business Ethics and Conduct is to ensure the conduct of business relations in a honest, fair, respectful to the environment and society manner. The Code of Business Ethics and Conduct sets responsible behavior standards and provides guidance on how to address significant ethical issues. Therefore, compliance with the Code of Business Ethics and Conduct is critical for the Company's success and social reputation.

The rules briefly cover the operations of Tansa Security Systems Clock and Ind. Trade Inc. ("Company" or "Tansa") and its employees; both within and outside the Company; in relations and businesses with persons involved in business relationships, employees, customers, suppliers, competitors, public institutions, and society. These rules form the basis of Tansa's business conduct, incorporating fundamental principles such as honesty, equality, justice, respect for human rights, and social responsibility, and ensure action according to these principles. These behavior principles aim to create a sustainable business environment, contributing to Tansa's long-term success and community benefit.

It is necessary for all parties involved in business relationships to be aware of, understand, embrace, and comply with these regulations. They are encouraged to seek guidance from their managers or the Human Resources Department when encountering potential violations or inconsistencies. If an inconsistency or any non-compliance is detected, it should be reported to the Ethics Committee via the Ethics Hotline. The Ethics Committee, if deemed appropriate, will report violations for investigation and action to the Human Resources Manager. The Board of Directors, the Ethics Committee, and the Human Resources Manager cooperate in resolving such matters.

4. BUSINESS ETHICS AND CONDUCT RULES





4.1 BUSINESS ETHICS

Business Ethics is a concept that ensures the Company and its employees act within the framework of fundamental values such as honesty, justice, responsibility, and trust during their business activities. Business ethics include the basic behavior rules required for maintaining the correct attitude in business relationships and decision-making processes, serving as a compass to guide ethical business conduct.

Tansa conducts its activities based on the Company's behavior rules in line with the principle of ethical business conduct, complying with sectoral rules, relevant local and international regulations. In cases where sector standards and legal regulations are unclear, the Company acts according to its Code of Business Ethics and Conduct.

Tansa's Business Ethics can be summarized by the following Behavior Rules:

Honesty

Confidentiality

Equality and Justice

Respect for Human Rights

Prevention of Conflict of Interest

Social Responsibility

4.2 CONDUCT RULES

4.2.1 Honesty

Tansa always bases its actions on being correct and honest. It aims to be transparent in business relations and create a trustworthy environment. Tansa, along with its employees, embraces the principle of honesty at every step and continues to be a reliable business partner to all its Stakeholders. However, this is not only the responsibility of the Company's internal teams but also requires the participation and support of all Stakeholders. In this direction, Tansa, together with all its employees and Stakeholders, embraces the principle of honesty at every step and works together to create a reliable business environment.

4.2.2 Confidentiality

The disclosure of Confidential Information can potentially harm the Company and its Stakeholders or provide an advantage to others. Therefore, all employees and Stakeholders are expected to be mindful of protecting all information classified as Confidential.

Employees must be careful about the confidentiality of data within the Company and all Stakeholders. This information should only be shared with authorized individuals when required by business. The sensitivities and responsibilities regarding confidentiality continue even after the termination of the relationship with the Company, and employees are obligated to return all documents and electronic copies obtained during their employment and to keep all information classified as Confidential after leaving the job.



Preventing the violation of Confidential Information is the responsibility of not only the employees but all Stakeholders. To protect the Company's reputation and reliability, the respect and dedication of all Stakeholders involved in the business relationship to Confidential Information and maintaining confidentiality are critical to Tansa's success and sustainability.

4.2.3 Equality and Justice

Tansa establishes honest and open business relationships with all its Stakeholders, valuing individuals' rights and freedoms wherever it operates. Accordingly, Tansa does not discriminate based on individuals' gender, ethnic background, race, economic status, religion, and other beliefs. This applies to recruitments and promotions, provided working conditions, and all relationships with suppliers and customers.

Tansa also promotes fair competition and makes efforts to ensure fair competition in business relationships. The Company, while operating in a competitive environment, ensures that competition stays within the legal and ethical principles and pays attention to creating a fair competition environment among Stakeholders.

4.2.4 Respect for Human Rights

Tansa's commitment to high-quality human resources management is supported by a set of guiding principles. These principles are based on valuing and respecting every individual and developing a collaborative work environment. Tansa ensures the full protection of its employees' personal rights and strives to provide broad opportunities for their education and development, helping them enhance their skills and succeed in their roles. Tansa places great importance on appreciating and celebrating the achievements of its employees, developing a culture of trust and support. The organization structure supported by Tansa promotes individual development through teamwork and collaboration, contributing to Tansa's overall success. Tansa prioritizes the talents and skills of its employees in recruitment and promotion processes, recognizing their potential to advance the Company and achieve collective success.

4.2.5 Prevention of Conflict of Interest

Preventing situations that may lead to a Conflict of Interest in all areas of business life is one of Tansa's most significant sensitivities. Before establishing any third-party business relationship, all employees and Stakeholders demonstrate the necessary sensitivity to prevent possible Conflicts of Interest. When Conflicts of Interest arise, they are handled legally and ethically to protect the interests of all involved parties. In cases of doubt, employees can consult their company managers, the Human Resources Department, or the Ethics Committee.

4.2.6 Social Responsibility

The principle of social responsibility is critically important for increasing the Company's reputation positively and providing societal benefits. This includes a respectful attitude towards the environment and society and forms the basis of the Company's understanding of sustainability and social responsibility. Accordingly, respecting society and the environment is a common responsibility of Tansa, both its employees and Stakeholders. Therefore, actions are taken with environmental sensitivity and a sense of responsibility towards society, working together to minimize environmental impacts and contribute to society while adhering to sustainability principles.

5.RESPONSIBILITIES





As Tansa, in all business life, along with legal responsibilities; care is taken to fulfill the responsibilities listed below towards employees, customers, suppliers and business partners, competitors, society, and humanity.

5.1 Legal Responsibilities

Tansa conducts its operations professionally, adhering to current laws, regulations, technical standards, and in accordance with Company policies and strategies. It acts according to the obligations specified in the contract in all its activities and expects the same level of commitment from all related parties and employees.

The Company complies with legal regulations and contracts in all its activities and expects this compliance from all related parties and employees. Additionally, it fulfills its obligations in commercial relations promptly and completely and conducts its operations both domestically and internationally in compliance with local and international legislation. All Company employees accept their obligations to comply with the Labor Law, Criminal Law, Personal Data Protection Law, and other relevant laws and regulations and act with the responsibility of non-compliance with these laws.

Unethical behaviors such as Irregularity, Bribery, and deceptive reporting are strictly prohibited. Tansa respects all legal rules and moral values of the country it operates in and takes necessary measures to prevent unethical behaviors.

5.2 Responsibilities Towards Customers

Respecting the rights of customers, ensuring reliability, and satisfying them are Tansa's main priorities. Additionally, the Company always works with a customer satisfaction-oriented approach, responding to customers' needs and demands as quickly, accurately, and effectively as possible.

The Company prioritizes its responsibilities towards customers according to its main priorities and customer satisfaction approach and operates in accordance with these responsibilities. Honesty and transparency are fundamental in customer relationships, and solutions that meet customers' needs are offered while adhering to ethical rules. In case of any problems with products and services, efforts are made to keep the communication channel accessible to customers and provide support by allocating resources.

5.3 Responsibilities Towards Employees

At Tansa, individuals' opinions are heard, respected, and valued. The Company expects the same care from all its employees and Stakeholders it works with. It values open and transparent communication, appreciates different perspectives, and encourages the exchange of ideas.



The Company ensures the full and correct use of employees' personal rights. It approaches employees fairly and honestly, commits to a safe and healthy working environment, values talent development and personal education, and provides a work environment that increases motivation and productivity.

5.4 Responsibilities Towards Suppliers/Business Partners

As a Company, an equal and fair approach is maintained in business processes towards suppliers and all business partners. The principle of equality among suppliers and business partners is adopted, and social responsibility initiatives such as combating discrimination, prioritizing the health and welfare of all employees, are encouraged.

Tansa transparently communicates the working conditions of suppliers to the relevant institutions and organizations it does business with, evaluates all offers objectively, and takes care to protect the Confidential Information of suppliers and all other business partners in accordance with legal frameworks.

5.5 Responsibilities Towards Competitors

Care is taken to compete within the framework defined by laws, statutes, and regulations, avoiding unfair commercial practices and adopting the principle of fair treatment towards competitors. Tansa exhibits ethical behaviors and adheres to competition rules to ensure fair and transparent competition. Illegal or unethical practices such as stealing competitors' trade secrets or accessing competitors' Confidential Information for unfair competition purposes are avoided. Additionally, a healthy competition environment that maintains market competitiveness and promotes innovation is supported.

5.6 Responsibilities Towards Society and Humanity

Tansa prioritizes human rights, environmental sustainability, and democracy. Respect is shown towards traditions and customs in Turkey and international traditions and customs.

An impartial and fair approach is maintained towards public institutions, political parties, and civil society organizations. Transparency and accountability are supported in all actions to positively impact the communities served.

A committed and conscious approach is taken towards fulfilling responsibilities towards society and humanity. Active participation in various social responsibility projects and humanitarian aid activities is encouraged. By supporting education, health, environmental protection, and social justice, the development of society and the improvement of living standards are facilitated. Human rights are respected, and efforts are made to provide fair and equal opportunities for various segments of society. In this way, contributing to the welfare of society and humanity, a fairer and more sustainable world is aimed to be built.

6.POLICIES SUPPORTING THE CODE OF BUSINESS ETHICS AND CONDUCT





The policies supporting the Code of Business Ethics and Conduct are key documents that shape the way the Company conducts business and its relationships with employees and external stakeholders. These policies aim to strengthen the Company's commitment to ethical values and compliance efforts. At the same time, they reinforce especially the principles of honesty and social responsibility. The effective implementation of these policies enhances the Company's credibility and creates a sustainable business culture. In line with these objectives, the following are among the fundamental policies adopted by Tansa, not limited to:

Anti-Bribery and Corruption Policy

Gift and Hospitality Policy

Donation and Sponsorship Policy

6.1 Anti-Bribery and Corruption Policy

Tansa defines its clear stance on combating Bribery and Corruption with the Anti-Bribery and Corruption Policy, providing guidance on preventing, detecting, and combating such violations. This highlights the Company's commitment to honesty and social responsibility principles.

The Company adopts a zero-tolerance policy for any Bribery or Corruption activities and strictly adheres to this principle in business relationships with third parties. Tansa demonstrates its determination to combat Bribery and Corruption by fully complying with national and international laws and agreements.

The Company may engage in representation, hospitality, or gift activities to develop commercial relations or participate in social responsibility principles in line with Donation and Sponsorship. However, these activities always remain within reasonable and professional limits and are not conducted before significant decisions. The timing, scope, and purpose of activities are carefully assessed; full compliance with transparency, equality, and justice principles is ensured.

Tansa strictly prohibits any facilitation payments perceived as Bribery to expedite transactions with public institutions. Employees and Business Partners should avoid such payments on behalf of Tansa. In addition, Tansa strictly prohibits donations to political parties and aims to maintain its neutrality and avoid providing financial support to political processes.

For detailed information, please review the Company's "Anti-Bribery and Corruption Policy."

6.2 Gift and Hospitality Policy

Tansa employees are required to avoid requesting or accepting any gain, benefit, special discount, commission, or reward that could influence their decisions or behaviors for personal gain, regardless of its economic value. Additionally, employees are strictly prohibited



from borrowing money from subcontractors, sub-suppliers, suppliers, competitors, or customers for free or on loan

However, under certain conditions, employees are allowed to offer or receive entertainment, courtesy, and dining within acceptable standards in the business area. Monetary gifts are excluded, but symbolic awards or souvenir gifts can be accepted at seminars and similar events on behalf of the Company.

All gifts received or given must be within the limits specified in the relevant policy, and all gifts must be reported to Company management; further information about these gifts in business relationships should be provided to the Human Resources Manager. This notification is made to prevent any ethical violation and ensure transparency. Accordingly, all accepted and rejected gifts are recorded in the Gift and Hospitality Inventory. These records are essential for transparency in future audits or inquiries.

For detailed information, please review the Company's "Gift and Hospitality Policy."

6.3 Donation and Sponsorship Policy

Tansa manages Donation and Sponsorship activities within certain principles, including legal compliance, ethical standards, transparency, accountability, and social sensitivity. Donation and Sponsorship decisions are made considering their long-term effects and benefits to society. Tansa ensures that Donation and Sponsorship activities do not contribute to Bribery, Corruption, and Irregularity. Donations to politicians, government officials, or political parties for political purposes are strictly prohibited. Activities are conducted transparently and documented. The upper limit of Donations and Sponsorships is determined annually by the Board of Directors, and activities are reported to the Board of Directors.

Tansa carefully evaluates Donation and Sponsorship decisions based on the Company's strategic goals and societal impact. The compatibility of the selected parties with Company values is ensured, and relationships that could risk reputation are avoided. Risks arising from the nature of activities are proactively managed and minimized. Requests are received in writing, evaluated, and the decision-making process is based on ethics, including transparency, equality, and justice. Approved activities are conducted in accordance with laws and Company policies.

For detailed information, please review the Company's "Donation and Sponsorship Policy."

7.IMPLEMENTATION OF THE CODE OF BUSINESS ETHICS AND CONDUCT





Employees who do not comply with the principles of Business Ethics or Company policies and procedures are subject to disciplinary investigation, which can lead to the termination of the employment contract. The investigation also applies to those who, despite being aware of possible violations, do not report them, approve or manage inappropriate behaviors.

Employees should understand, accept, and fulfill the specified duties; they should make ethical behavior a habit while performing their jobs. Ignorance of the Code of Business Ethics and Conduct and similar regulations does not exempt them from their responsibilities.

7.1 Reporting Obligation for Violations

The Code of Business Ethics and Conduct, prepared in line with the Company's ethical principles and values, obliges employees to report to the Ethics Hotline any situations contrary to this guide or violations of the legal regulations the Company is subject to.

The identities of those who report and complain are kept confidential and not disclosed to third parties. During the investigation process, necessary sensitivity is shown to protect the anonymity and confidentiality of the reporting individuals.

No employee who reports in good faith is allowed to be threatened or harmed either in the workplace or outside. Intentionally making false or defamatory statements is considered a violation of ethical standards. Such behaviors are interpreted as ethical rule violations, and necessary disciplinary penalties are applied.

Any situation suspected to be contrary to this Policy, the laws of the relevant country, or Company internal policies/procedures, witnessed violations, or obtained information about violations should be reported to the Ethics Committee through the following Ethics Hotline communication channels:

Phone number: +90 540 204 1962

Email: ethics@tansaglobal.com

7.2 Disciplinary Practice

Notifications related to violations reported to the Company are handled and resolved according to established procedures. In this context, violations reported to the Ethics Hotline are examined by the Ethics Committee and, if necessary, forwarded to the Human Resources Manager. The Human Resources Manager may request guidance from the Ethics Committee in necessary cases.

In case of violations of the Code of Business Ethics and Conduct and/or Company policies and procedures, employees may face various disciplinary sanctions, including the termination of the employment contract.

For detailed information, please review the Company's "Disciplinary Policy."



7.3 Ethics Committee

The Ethics Committee is responsible for examining complaints and notifications of violations of the Code of Business Ethics and Conduct. After reviewing all notifications, it is responsible for investigating possible violations and conflicts and taking action on them, forwarding the issue to the Human Resources Manager if deemed necessary.

The Ethics Committee, which operates under the Chairman of the Board of Directors, consists of the following positions:

Ethics Committee Chairman: Chairman of the Board of Directors

Ethics Committee Member: Human Resources Manager

Ethics Committee Member: Company Lawyer

Notifications are addressed as quickly as possible, and the investigation process is initiated. If necessary, it may seek expert opinions on legal, social, financial, and medical issues.



TANSA

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