

PAPILON SAVUNMA

ETHICAL POLICY



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PAPILON ETHICAL POLICY

1) OBJECTIVES

Creating a common corporate culture, creating a harmonious working environment and being a responsible company to society is our main goal in creating the Ethics Policy. In accordance with this purpose, it is aimed to develop the institution by considering the reputation of the institution, to act in accordance with legal requirements, to act in line with the expectations of the stakeholders, to protect and strengthen the position of the company against competitors, to reduce the possible effects of an abuse and crisis environment, and to adapt the company to changes.

2) SCOPE AND RESPONSIBILITIES

This policy is done by Papilon Savunma – Güvenlik Sist. Bilişim Müh. Hiz. İth. İhr. San. ve Tic. A.Ş. and all employees working and are monitored through the Human Resources and Ethics Representatives under the responsibility of the Board of Directors.

INTRODUCTION

For our Company, which was established in 2012, to provide a healthier working environment for its employees and to grow in integrity, we think that our Company's ethical codes and values should be developed and ethics as a living concept contribute to it.

Ethical code, with its common definition, is a set of written rules prepared to determine the universal truths in business life, to act in the light of these truths and to guide the behavior of the company employees. Maximum compliance with the Papilon Code of Ethics is ensured by every member of the Papilon family, and they are expected to comply with each ethical rule included in this policy. Members of the Board of Directors adopt the code of conduct defined in the Ethics Policy.

Every Papilon employee wants life to go the right way. This policy informs our employees about what should happen and explains how they can reach the right. For this reason, the Papilon Ethical Policy is available on our corporate website in a publicly accessible manner. No special privileges are granted to any employee within the scope of this policy, all employees are evaluated equally. Those who see any unethical action, but ignore it and do not report the situation, are in violation of the ethical rules.

Ethics Representatives report the violation of ethics decided unanimously to the Board of Directors in writing.

1. OUR FUNDAMENTAL ETHICAL PRINCIPLES

These are our basic principles to develop Papilon in a way to meet the demands of all stakeholders and the society.

Papilon employees,

- Are aware that the most basic resource is 'human'.
- Because of its value and usefulness, treats all living things with care and prudence.
- Never insult any person, person's right or opinion; values people, their rights and opinions.
- Behave in good intentions, understanding and respect with relationships based on open communication.
- Pay attention to the adoption of corporate belonging.
- Encourage different ideas, decisions, teamwork, common sense, flexible thinking / acting.

2. OUR CODE OF CONDUCT

Papilon employees,

- Act with the awareness of its responsibilities.
- Can manage his stress and emotions, use them as a motivational tool, and make teamwork more effective.
- Take care not to behave that would cause the other person to feel insecure.
- Take a proactive approach in diversity and conflict management, manages conflict in a constructive way.
- Account for all kinds of activities in the process of making the necessary effort to achieve the goals. In all cases, take an accountable attitude instead of hiding behind someone else or blaming someone else.
- Try to prevent unethical behavior and makes the necessary warnings.
- Do not act in a way that prevents colleagues from fulfilling their duties and do not disturb the work harmony.
- Do not make statements about third parties that would disrupt the work harmony and work harmony.
- Thanks to the honest and consistent behavior, strengthen his sense of trust with colleagues.

- When it comes together with stakeholders, represent Papilon in the best way and pays attention to behavior and attitude.
- Behave sensitively and sensitively in using common areas within the company.
- Fulfil its duties within the framework of basic moral and human values.

3. PREVENTION OF CONFLICTS OF INTEREST

Papilon employees,

- Do not abuse status at work, individual power (title, physical, age) or collective power (power arising from excess numbers).
- Do not provide unfair advantage for self, relatives and third parties by taking advantage of the title and authority.
- Inform manager if relatives have a share or financial interest in another company with which there is a commercial relationship.
- Papilon does not use or make use of its assets for its own interests or for anyone inside / outside the Company.
- Keep the interests of the company above its own.
- While allowing differences to be turned into advantage, prevent them from creating superiority.

4. SOCIAL RESPONSIBILITY

Papilon employees,

- Are supported by the company to volunteer in social activities that they will take part in with social responsibility awareness.
- Often take actions of helping, taking responsibility and ownership, learn and teach.
- Strive for the sake of self and colleagues.
- Demonstrate an open, honest, consistent cooperation with stakeholders.

5. GIFTS AND DISCOUNTS

Papilon employees,

- Act with common sense in accepting gifts and discounts, do not accept benefits over 500 TL in total annually. Report the gifts within the framework of undeniable authority and courtesy measures to Human Resources within 2 days at the latest. It is ensured that the gifts reported are kept within Papilon. During the visits, modest promotional material that can contribute to the promotion of Papilon, within the knowledge of the top management, may be given as a gift.
- Can accept invitations associated with interviews and collaborative activities (such as lunch during meeting hours, dinner / cocktail organized for the aftermath).

6. PRIVACY

Papilon employees,

- Know the importance of insider information and ensure confidentiality of information regardless of location. Do not use inside information for personal and third-party benefits.
- Observe the confidentiality and integrity of the company, care and protect all its tangible and intangible assets as if it were personal property.
- Do not share any confidential information with third parties, unless required by official authorities and laws.
- Do not share about the internal processes, intellectual property, information, and inventions that has due to a duty.
- Know that the fee information is private, do not share it with anyone, and do not try to learn anyone's fees.
- Do not speak inside information in public places inside / outside the company.
- Do not disclose confidential information and documents of previous workplace and / or employers to Papilon or other colleagues. Papilon do not require its employees to disclose such information and documents.

7. PREVENTION OF DISCRIMINATION AND HARASSMENT

Papilon employees,

- See every individual as equal, regardless of religion, language, race, gender, political or other opinion, and national and social origin.
- Value differences such as age, language, race, ethnicity, health status, gender, marital status, religion, cultural structure, political thought, and philosophical belief.
- Know that diversity is richness. Do not tolerate the actions and behaviors of those who violate this principle and warn those who witness discriminatory treatment.
- In recruitment processes, do not discriminate in terms of gender, age, religion, language, race, ethnic or national origin.
- In the recruitment and promotion processes, only address the qualifications and skills appropriate for the job and observe equality of opportunity.
- Are based on impartiality.

8. PROTECTING ANIMALS AND THE ENVIRONMENT

Papilon employees,

- Act with the awareness of environmental protection, warn those who do not behave and works to increase this awareness.
- Do not act in a way that threatens the environment.
- Avoid any behavior that could make any living thing feel unsafe.
- Work for the development of environment and nature friendly technologies.

9. OCCUPATIONAL HEALTH AND SAFETY

Papilon employees,

- Are committed to providing a safe work environment and fulfilling environmental responsibilities.
- Apply the measures taken within the scope of occupational health and safety at work. Avoid behaviors that will cause the other person to feel insecure.

10. POLITICAL ACTIVITIES

- Papilon do not support political parties, politicians or political candidates. Do not donate to these individuals and organizations.

Papilon employees,

- Respect everyone's political opinion.
- Do not agree to participate in propaganda and similar activities.
- Do not stand as a candidate in any election without terminating the job at Papilon .
- Do not use Papilon's resources in political activities.

11. INVESTOR RELATIONS

The method to be followed in any public disclosure made by the persons authorized to make a statement is included in the Papilon Information Policy, and these regulations are followed. Papilon Investor Relations Unit ensures the fulfilment of the obligations in the Capital Market Legislation.

12. COMPLIANCE WITH LAWS AND COMPANY CODE OF ETHICS

Papilon employees,

- Ensure that all records are properly kept and archived within the legal period.
- Are obliged to report any situations they deem or suspect contrary to the applicable laws, legislation and Papilon regulations.
- Do not gain unfair profit from individuals and organizations for whatever purpose.
- Unless explicitly authorized, do not act, make a statement or correspondence that would put the company under responsibility.
- Always abide by the law.

13. REPORTING IMPROPER CONDUCT

All suspicions about violations of the law or business ethics principles are reported to the Ethics Representatives as soon as possible.

Ethics Representatives consist of the following persons:

Chairman - Papiilon Vice-Chairman of the Board

Member - Papiilon Legal Consultant

Member - Papiilon Human Resources Leader

In case of not wanting to report unsuitable behaviors or doubts face-to-face, an ethics line can be used without any concern. In this case, complaints or doubts can be reported directly to the email address etik@papilon.com.tr or to the fax number 0 (312) 231 20 28 and contact can be made.

The purpose of the ethics hotline is to clarify and provide clear information to individuals when there is uncertainty about Papiilon Ethics Policy and to report any suspicion of ethical violation without hesitation.

Any complaint or suspicion will be evaluated by Ethics Representatives as soon as possible.



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