

Code of Business Ethics Policy

1. General Principles

1.1. Integrity

In all our business processes and relationships, accuracy and integrity are our core values. We act with honesty and integrity in our relationships with employees and all our stakeholders.

1.2. Confidentiality

Confidential and proprietary information includes company-related information that could create a competitive disadvantage, trade secrets, financial and other information that has not yet been disclosed to the public, employee personal rights information, and information covered under "non-disclosure agreements" made with third parties.

As company employees, we take care to respect the confidentiality and protect the classified information of our customers, employees, and other relevant individuals and organizations we work with. We protect confidential information related to company operations, use it only for company purposes, and share it only with authorized individuals within the defined scope of their responsibilities.

Obtaining any commercial benefit, including stock trading on exchanges, through the leak of any confidential company information (insider trading) is unacceptable. Upon leaving the company, we will not take any confidential information, documents, or projects, regulations, etc., that we have obtained due to our duties, outside of the company.

1.3. Conflict of Interest

We aim to avoid conflicts of interest. We do not personally benefit from or allow our family members or close relations to benefit from individuals or organizations with whom we have business dealings. Employees must inform Human Resources of any financial business activities outside the company. Participation is only permitted with CEO approval. We refrain from using the name and power of Doğanlar Furniture Group, our company identity, for personal gain.

In the event of a potential conflict of interest, we apply methods that we believe can safely protect the interests of the parties involved through legal and ethical means. In situations where we have doubts, we consult with our manager or the Human Resources Department.

2. Our Responsibilities

In addition to our legal responsibilities, we make it a priority to fulfill the following responsibilities to our customers, employees, shareholders, suppliers and business partners, competitors, society, humanity, and on behalf of the company.

2.1. Our Legal Responsibilities

We conduct all our activities and operations both domestically and internationally in accordance with the laws of the Republic of Turkey and international law, and provide accurate, complete, and understandable information to regulatory institutions and organizations in a timely manner. In carrying out our activities and

operations, we maintain an equal distance from all public institutions and organizations, administrative bodies, civil society organizations, and political parties, without any expectation of personal benefit, and fulfill our obligations with this sense of responsibility.

2.2. Our Responsibilities to Our Customers

We prioritize customer satisfaction by responding to needs promptly and accurately. We deliver our services on time and under the agreed conditions, treating our customers with respect, honor, fairness, equality, and in accordance with the principles of courtesy.

2.3. Our Responsibilities to Employees

We ensure that employees' rights are respected and upheld. We treat employees with honesty and fairness, and commit to providing a non-discriminatory, safe, and healthy work environment. We support employees' professional growth, encourage social responsibility initiatives, and promote work-life balance.

2.4. Our Responsibilities to Our Partners

Prioritizing the continuity of our company and aiming to create value for our partners, we avoid taking unnecessary or unmanageable risks and strive for sustainable profitability. We act within the framework of financial discipline and accountability, managing our company's resources, assets, and working time with efficiency and a focus on savings. We aim to enhance our competitive strength and invest in areas with growth potential that will provide the highest return on the allocated resources. In our public disclosures and communications with shareholders, we provide timely, accurate, complete, and understandable information regarding our financial statements, strategies, investments, and risk profile.

2.5. Our Responsibilities to Suppliers/Dealers

We treat our suppliers with fairness and respect, ensuring timely fulfillment of our commitments. We carefully protect the confidential information of the individuals, organizations, and business partners we work with.

2.6. Our Responsibilities to Our Competitors

We ensure the protection of fair and free competition, applying legal and ethical principles in all our business processes. We respect the intellectual property rights, patents, trade secrets, and other legal rights of our competitors, and avoid unfair competition. We support efforts to establish the desired competitive structure within society.

2.7. Our Responsibilities to Society and Humanity

We are committed to protecting democracy, human rights, and the environment while supporting education, charitable work, and efforts to combat crime and corruption. As responsible corporate citizens, we take the lead in addressing social issues with care and integrity. We respect the traditions and cultures of Turkey and the countries in which we operate internationally. We do not offer or accept bribes or gifts/products and services of excessive value.

2.8. Our Responsibilities on Behalf of 'Doğanlar Furniture Group'

Our business partners, customers, and other stakeholders trust us due to our professional competence and integrity. We strive to maintain this reputation at the highest level.

We deliver our services within the framework of company policies, professional standards, our commitments, and ethical guidelines, and demonstrate the necessary dedication to fulfill our obligations.

We make sure to provide services in areas where we believe we are and will be professionally competent. We aim to work with customers, business partners, and employees who adhere to the criteria of accuracy and legitimacy. We do not work with those who harm public morals, the environment, or public health.

In public and in areas where listeners believe we are speaking on behalf of the company, we express not our individual opinions, but only the views of the company.

When faced with complex situations that could put our company at risk, we first consult with the appropriate authority by following the proper technical and administrative consultation procedures.

3. Policies Supporting the Code of Business Ethics

3.1. Conflict of Interest Policy

It is essential for company employees to avoid situations that may create conflict of interest. Avoiding the use of company resources, name, identity, and power for personal benefit, and situations that could influence the company's name and image negatively, are the primary responsibilities of all employees. The following guidelines define potential conflict of interest situations that employees may encounter in their duties or personal lives due to work relationships, and the principles that should be applied in these situations.

3.1.1. Implementation Guidelines

3.1.1.1. Activities That May Create a Conflict of Interest

All company employees must fully comply with the situations listed below as activities that may create a conflict of interest. The company takes the necessary steps to encourage its employees to adhere to these principles.

a. Engaging in Activities That May Create a Conflict of Interest

Employees must not engage in any business relationships that provide mutual or non-reciprocal benefits with family members, friends, or other third parties. For example, an employee with purchasing authority should avoid doing business with a supplier where a family member works. Exceptional cases are subject to the knowledge and approval of the CEO. Similarly, employees should be cautious about potential conflicts of interest arising from close family members working with the company's competitors.

Employees are prohibited from using insider information to engage in stock trading or gaining any commercial benefit, including facilitating others in obtaining such benefits.

It is essential that company employees do not engage in activities that would qualify them as a "merchant" or "tradesperson," either directly or indirectly. Employees must not work for another person and/or organization for a fee or similar benefit during or outside of working hours, under any name or title.

However, employees working for another person (family members, friends, or other third parties) and/or institution for a fee or similar benefit outside of working hours may be permitted under specific conditions;

- It does not create a conflict of interest with the role they hold at the company,
- It does not cause any inconsistency with other business ethics rules and supporting policies,
- It does not negatively affect their ability to continue performing their duties at the company,
- It is subject to written approval from the management.

Approval of such activities is given by the CEO for senior positions, and for other employees, it is provided by the CEO based on the opinion of the Human Resources department.

Company employees cannot serve on the board of directors or as auditors without the CEO's approval, nor can they take positions in companies that are competitors or with which the company has business relations. In non-profit organizations and universities, provided that their duties at the company are not disrupted, employees may engage in social responsibility and charity-related roles with written approval from the CEO.

Managers involved in recruitment decisions cannot hire their spouses, close relatives, or the close relatives of these individuals.

Employees can speak on topics unrelated to the company and its activities, provided that it does not contradict the company's policies. For these activities to use the company's name, approval from the CEO is required.

Company employees may engage individually and voluntarily in active participation in any political party. Managers cannot ask their employees to engage in political activities or become members of a political party. Employees' involvement in any political party is possible under the following conditions and with written approval from the CEO;

- Employees' involvement in any political activity must not create a conflict of interest with their role at the company.
- Employees cannot engage in political activities during working hours, nor can they take up their colleagues' time for such activities.
- Employees may not use the company's name, their position, title, or company resources during political activities.

For employees wishing to engage in political activities, approval is granted as follows: for senior positions, approval is given by the CEO, and for other employees, approval is granted by the CEO with the consultation of the Human Resources department.

Employees may personally make financial or moral contributions or donations to third parties outside the company or engage in volunteer work in charitable organizations.

b. Abuse of Power

It is unacceptable for employees to misuse their authority for personal gain or to benefit their relatives, especially when it causes harm to the Company.

Employees are prohibited from gaining personal profits, either directly or indirectly, from the company's purchasing and sales activities, as well as from any transactions or contracts the company is involved in.

Employees must refrain from engaging in any actions or behaviors that violate ethics, laws, or company discipline.

c. Use of Resources

Company resources must be used responsibly and, in the company's best interest. Company assets and resources cannot be used for personal purposes, under any name or for any person's benefit, without a direct company interest. The principle of "saving in all matters" should be applied by all employees.

The proper use of resources for the company's benefit also requires efficient use of time. During working hours, employees must use their time effectively and avoid personal matters during work hours. Managers cannot assign employees personal tasks. All company-owned tools, equipment, and resources must be used appropriately and efficiently to avoid waste, and company resources should not be used for personal work. It is essential that company assets/resources are used productively during working hours.

Employees should not accept personal visitors during work hours. Necessary meetings with visitors must be brief and conducted in a reasonable time frame, aligned with the nature of the visit and without interfering with the work process.

d. Relations with Other Persons and/or Organizations with Whom the Company Has Commercial Relationships

The company's employees, subcontractors, suppliers, and any other persons or organizations with whom the company has a commercial relationship are prohibited from entering into personal business relationships, borrowing or receiving goods/services for personal purposes, or lending money and/or goods/services to them.

In customer relations, the following principles must be observed: even if it is in the customer's favor, no transaction should be carried out without the customer's knowledge. Additionally, even if it benefits the company, the weaknesses of the customer must not be exploited, and no profit should be made by providing incomplete or incorrect information to the customer.

Employees of the company may not request gifts from person or organizations with whom the company has a commercial relationship, nor can they imply such requests. No gifts, money, checks, property, free vacations, exclusive discounts, etc., that would place the company under obligation may be accepted. Personal assistance or donations cannot be accepted from any person or organization with whom the company has a business relationship.

e. Media/Social Media Relations

Any statements to media outlets, interviews, or participation as a speaker in seminars, conferences, etc., are subject to CEO approval. Personal gains from such activities are strictly prohibited.

Social Media Platforms:

Employees must ensure that their comments are not mistaken for official company statements. Visual and audio elements associated with the company's brand, logo, or Doğanlar Furniture Grubu should not be used without the company's authorization.

Any comments or shared content, including written posts, visual media, photos, news, and similar documents, made outside of work hours must comply with the company's Code of Ethics.

Comments about the work environment, colleagues, or managers should not violate confidentiality agreements, nor should they be derogatory, offensive, or against general ethical standards. Audio or visual content that may be considered harmful should not be published.

Any unpublished company information, such as campaigns, technical details, pricing, or other sensitive company data should not be shared.

Social Media: Refers to the general term for media systems where individuals publish and/or share various types of content on platforms they have created or are publicly accessible on the internet. It is a system of communication that is bidirectional and simultaneous. Examples include blogs, social networking platforms (such as Facebook), microblogs (such as Twitter), collaborators (such as Wikipedia), multimedia sites (such as YouTube), review and complaint platforms (such as Şikâyet Var), social bookmarking platforms, entertainment and gaming platforms, etc.

f. Representing the Company

On behalf of the company, any fees accrued for duties performed in associations, employer unions, and similar civil society organizations should be donated to the relevant institution or to the channels designated by the institution.

If an individual is providing training or seminars based on their acquired knowledge/skills, they may receive seminar or university speaker fees. Additionally, individuals may receive symbolic gifts such as awards, plaques, etc., as a memento of the event. Information about the seminar or university speech should be shared with the Human Resources department.

3.2. Gift Receiving/Giving Policy

It is essential that the company and its employees do not accept any gifts or benefits that could affect their impartiality, decisions, or behavior, nor engage in providing gifts or benefits to third parties or organizations that could create such influences. The following guidelines define the principles for managing the exchange of gifts between company employees and third parties or organizations they are involved with in business relationships.

3.2.1. Implementation Principles

- a.** It is prohibited for company employees to accept any gifts or benefits, whether of economic value or not, that could affect or have the potential to affect their impartiality, performance, or decision-making while performing their duties.
- b.** Employees of the company;
 - Line with the organization's business objectives,
 - Compliant with the applicable legislation
 - The gift will not put the company in an inconvenient situation if it becomes officially/publicly known.

They may accept and/or give gifts within the framework of the conditions outlined, or agree to be subject to a special application.

- c. Subject to compliance with the conditions specified in the second article:
 - Company employees may give and receive entertainment, hospitality, and meals in line with acceptable standards in the business world.
 - In seminars and similar events attended on behalf of the company, gifts with symbolic value, such as awards, plaques, etc., may be received as mementos of the day, excluding money.
 - Promotional items with company logos may be given/received as gifts."
- d. The receiving of gifts or benefits that are explicitly or implicitly tied to a return is prohibited.
- e. Accepting, giving, or offering bribes and/or commissions is not acceptable under any circumstances.
- f. It is prohibited for company employees to accept money without compensation from subcontractors, suppliers, consultants, competitors, or customers, or to cover event expenses and similar payments.
- g. Gifts and promotional materials to be given by the company to customers, dealers, and other third parties in business relationships must be approved by the CEO. No additional permission is required for the distribution of approved gifts and promotional materials.
- h. Subject to compliance with the conditions outlined in the second article, the company may accept appropriate products and services as gifts and, with the knowledge and approval of the CEO, provide gifts worth up to 300.00 TRY that align with the recipient's culture and ethical values.
- i. A record must be kept of all received and given gifts.
- j. If it is believed that rejecting a gift may damage business relationships or violate cultural norms, the relevant senior manager and Human Resources should be informed.

3.3. Invitation Participation Policy

In the case of participation in various organizations and invitations from customers, dealers, suppliers, banks, legal and customs consultants, etc., in the context of a business relationship, the following conditions must be observed:

- a) For supplier product launch/promotional events, the product must be new, and the invited person must be someone directly influencing the purchasing decision.
- b) The invitation should only cover transportation and accommodation costs.
- c) In the case of being invited as a speaker to a conference, all expenses should be covered by the inviter. If this is not the case, approval from the CEO must be obtained.
- d) For dealer events, if the invitation includes spouses, only the costs of the employee should be covered by the inviter. The costs for the spouse/family must be borne by the employee.

3.4. Confidential Information Protection Policy

Information is one of the most important assets that the company will use to achieve its goals. In this regard, the effective use of information, its proper sharing, and ensuring its confidentiality, integrity, and accessibility throughout this process is the shared responsibility of all our companies and employees. In our company, it is important that the management systems, processes established for information management, and confidentiality are in harmony with each other to achieve the highest level of benefit. The following application principles define confidential information for the company and regulate the principles that employees must follow regarding confidential information.

3.4.1. Application Principles

Confidential information includes, but is not limited to, intellectual property rights such as the company's brand, any innovations, databases, printed communication materials, processes, advertising, product packaging and labels, and plans (marketing, product, technical), business strategies, information about strategic partnerships and partners, financial information, employee information, customer lists, product designs, know-how, specifications, the identity of potential and actual customers, information about suppliers, etc. It covers all types of written, graphic, or machine-readable information.

The principles to be followed regarding confidential information are outlined below.

- a. The information cannot be disclosed to third parties unless required by Official Authorities and Regulations.
- b. The information cannot be altered, copied, or destroyed. Necessary precautions are taken to ensure that the information is kept carefully, stored securely, and not disclosed. Any changes to the information are recorded along with its history.
- c. Confidential files cannot be taken outside the organization. For confidential information that must be taken outside the organization, approval must be obtained from the responsible or the CEO.
- d. Passwords, user codes, and similar identifiers used to access company information must be kept confidential and not disclosed to anyone other than authorized users.
- e. Company confidential information should not be discussed in public areas such as cafeterias, elevators, service vehicles, or similar places.
- f. If there is a need to share information with third parties and/or organizations for the benefit of the company, a confidentiality agreement must be signed, or a written confidentiality commitment must be obtained from the other party to ensure that these parties understand their responsibility for the security and protection of the shared information.
- g. False statements and/or gossip about individuals or institutions are not allowed.
- h. Employee-specific information, such as salary, benefits, and similar personal details that reflect company policy, is confidential and cannot be disclosed to anyone other than authorized personnel. Employee information is sent personally. It is strictly prohibited for employees to disclose this information to others or to pressure other employees to disclose it.

What is confidential information?

Not limited with as below, but including:

- a. Customer information
- b. Trade secrets, details and information
- c. Strategic plans and business plans
- d. Financial information
- e. Information about suppliers
- f. R&D (Research and Development) activities
- g. Employee salary, benefits, personal information, etc.
- h. Any information related to factories and production
- i. Non-public information about the company

3.5. Accuracy in Financial and Commercial Records

Accuracy is the most crucial element for a successful business and is a fundamental part of enabling a business to operate legally, honestly, and efficiently. Accurate record-keeping and reporting will positively reflect on the company's reputation and reliability and will ensure that the company fulfills its legal and regulatory responsibilities.

Any reports, presentations, financial statements, and footnotes that we will disclose to the public or submit to authorized authorities must be prepared and stored in accordance with laws, regulations, and Business Ethics rules. They must be timely, complete, accurate in all material respects, clear, and transparent.

3.5.1. Principles of Application

- We ensure that financial and commercial records are always accurate and fulfill our responsibilities in this regard.
- We securely maintain the records and adhere to the principles regarding record-keeping/storage.
- We cooperate with our internal and external auditors.

3.6. Compliance with Competition Rules

There are many laws and regulations that govern relationships with competitors and protect their confidential information. It is essential that we acquire competitive information ethically and in accordance with these regulations at all times. Violating competition rules can result in significant financial penalties or potential imprisonment for us as individuals.

We avoid any behavior that could harm free and fair competition and act in accordance with legal and ethical competition rules. In business, we support and encourage initiatives that promote a fair and competitive environment.

3.6.1. Principles of Application

- We do not share commercially sensitive information, including customer and product details, with competitors.
- We only seek information about our competitors through legal means.
- We avoid methods that would unfairly distort competition, such as driving competitors out of the market or preventing new competitors from entering the market.

3.7. Policy on Creating and Maintaining a Fair Work Environment

The company considers the creation and maintenance of a fair work environment for employees as one of its top priorities. The aim is to establish a fair, respectful, healthy, and safe work environment that is in compliance with all applicable laws and regulations, thereby enhancing employees' success, development, and commitment. The following implementation principles outline the basic principles for creating and maintaining a fair work environment within companies.

3.7.1. Principles of Application

- a. The company's practices comply with all relevant laws and regulations regarding employment and working life. Company employees also fulfill all legal requirements within their activities and behave in accordance with legal regulations
- b. The company's human resources policies and practices ensure fairness in recruitment, promotion, transfer, rotation, compensation, rewards, benefits, and all other practices.
- c. Discrimination among employees within the organization based on language, race, color, gender, political views, beliefs, religion, sect, age, physical disability, and similar reasons is unacceptable.
- d. The company creates a supportive, positive, and harmonious work environment, preventing conflict situations and ensuring that individuals with different beliefs, thoughts, and opinions can work together harmoniously.
- e. The privacy and personal space of employees are respected.

- Communication between individuals cannot be violated by third parties.
 - Even if legally recorded, the unlawful sharing/dissemination/obtaining of personal data to others is prohibited.
 - Employee personal data, which arises from the nature of the employment relationship and may be necessary in the future, shall not be used for purposes other than its intended use and shall not be shared with third parties without the individual's consent. Employee personal data that arises from the nature of the employment relationship and may be necessary later is not used for purposes other than its intended purpose and is not shared with third parties without the consent of the individual.
 - The private and family life of all employees is respected.
- f. In addition to the inviolability of employees, their physical, sexual, and emotional inviolability is also observed.
- It is unlawful and unethical for employees to have their physical, sexual, or emotional inviolability violated through harassment in the workplace, or any location related to their work, and the company will not tolerate such actions in any matter. The purpose of this practice is to ensure employees work in an environment where their physical, sexual, and emotional inviolability is protected.
 - The violation of someone's bodily integrity through sexual conduct and/or sexual harassment without physical contact is defined as sexual harassment. Any behavior falling within this definition is prohibited.
 - Additionally, individuals who display negative behavior toward those who file complaints or assist in investigations regarding harassment will also not be tolerated.
- g. No employee can request preferential treatment based on gender, religion, language, or race, nor can they show favoritism or be subjected to special treatment. Taking advantage of differences such as gender, religion, language, or race to obtain or offer concessions is unacceptable.
- h. The physical working environment and conditions of the workplace are ensured to be healthy and safe for all employees.

3.8. Sharing and Trading Internal Information (Insider Trading)

"Insider information is defined in the legislation as any information, event, or development that has not been publicly disclosed and that could affect the value or price of capital market instruments or influence investors' investment decisions.

Employees of Doğanlar Furniture Group are aware that using or disclosing any commercial, financial, technical, legal, or other confidential information belonging to the company to third parties, and attempting to obtain any commercial benefit, including buying or selling shares directly or indirectly on the stock exchange (insider trading), is a legal offense. They refrain from such actions. Even after leaving the company, employees take the necessary measures to protect confidentiality and comply with confidentiality obligations."

Individuals listed on the insider trading list include the board chairpersons and members, executives (persons holding positions such as managers or higher), auditors of publicly traded companies, as well as those who may be in a position to obtain such information due to the nature of their professions and duties, and individuals who may have access to such information directly or indirectly due to their contacts with the aforementioned persons. At Doğanlar Furniture Group., this list is available on the corporate website. Those with regular access to insider information are also reported to the Central Securities Depository. Individuals on this list are aware of their obligations under the relevant legislation regarding this information and the sanctions for its misuse.

4. Responsibilities

4.1. Employees' Responsibilities

- Acting in compliance with laws and regulations under all circumstances,
- Reading the *Business Ethics*, knowing, understanding, internalizing the rules, principles, and values it contains, and acting in accordance with them,
- Learning the general policies and procedures applicable to the company and those specific to their work,
- Consulting with their manager and Human Resources regarding potential violations, whether personal or involving others
- Promptly reporting potential violations related to themselves or others, communicating these issues to their manager and Human Resources in writing or verbally, either with their name or anonymously.

4.2. Responsibilities of Managers

- Ensuring the creation and maintenance of a company culture and work environment that supports ethical rules,
- Leading by application of ethical rules, and training employees on ethical guidelines,
- Supporting employees in conveying questions, complaints, and reports regarding ethical rules,
- Providing guidance on what should be done when consulted and taking into consideration all reports received,
- Ensuring that the business processes under their responsibility are structured to minimize ethical risks and following the necessary methods and approaches to ensure compliance with ethical rules.

4.3. Other Responsibilities

The senior management of the company is responsible for the effective implementation of the business ethics rules and the creation of a culture that supports them.

The Human Resources department of the company

- The Human Resources department is responsible for providing training periodically to inform employees about the Ethical Rules, ensuring the clarity of policies and rules, and maintaining continuous communication with employees on this topic,
- Ensured that new employees read the ethical rules and are informed about them.

Company management is responsible for,

- Company management is responsible for guaranteeing the confidentiality of complaints and reports made within the framework of the Ethical Rules and protecting individuals after the reports.
- Ensuring the security for employees who report”
- Guaranteeing that complaints and reports are investigated in a timely, fair, consistent, and sensitive manner, and taking decisive action in case of violations.

5. Actions to Be Taken When Violations of Ethical Rules are Observed

- An email is sent to etik@doganlarmobilyagrubu.com.
- After the necessary research and investigations are carried out by the Internal Audit team, the Ethics Committee reviews the report and decides accordingly.

The Ethics Committee carries out its work within the framework of the principles defined below:

- It keeps the identity of those who make reports or complaints confidential.
- It ensures job security for reporting employees
- It conducts the investigation with as much confidentiality as possible.
- The Internal Audit Department has the authority to directly request information, documents, and evidence related to the investigation from the relevant department. It can only review the information and documents obtained in relation to the subject of investigation.
- The investigation is promptly handled by the Internal Audit Department and results are reached as quickly as possible. Following the review, a case report is prepared. The report is recorded and shared with the Ethics Committee.
- The decisions of the Ethics Committee are immediately implemented.
- Relevant departments and authorities are informed about the results.
- If deemed necessary, the Committee may seek expert opinions and, while ensuring confidentiality principles are not violated during the investigation, may consult with experts.

6. Resolving Violations of Ethical Rules

Those who violate the business ethics rules or company policies and procedures will be subject to various disciplinary actions, which may include being asked to leave the company if necessary. Disciplinary actions will also be applied to individuals who approve, direct, or are aware of inappropriate behavior and actions that break the rules, and who fail to make the necessary reports properly.