



OUR BUSINESS ETHICS POLICY

We, as **NOVA**, it is our fundamental commitment to comply with the principles of business ethics and codes of conduct in all our activities, and to fulfill our part in the light of our basic principles in order to create a safe, healthy, clean and quality working environment and conditions for our employees, stakeholders and other interested parties

- Honesty and Trust

Honesty and mutual trust are the basis of all our relationships and business processes inside and outside the company. We act with integrity and honesty in our relations with our employees, customers and all stakeholders, and take care to keep our promises as a company and as an individual. Timely, complete and accurate record keeping, reporting and presentation are essential for our company to be a reliable organization. Therefore, false, incomplete and/or misleading record keeping, accounting, statements, documents, declarations and reports are strictly prohibited.

- Privacy and Information Management

We take care to protect the private information of our customers, employees and all interested parties, information about confidentiality agreements with our customers, intellectual property rights and any other commercial and technical secrets.

- Objectiveness

We provide equal opportunities to our employees and Stakeholders and do not discriminate under any conditions or circumstances based on race, color, gender, religion, opinion, philosophical belief, sect, age and physical disability.

- Conflict of Interest

As Nova, we aim to avoid situations that create a conflict of interest in all our activities. We do not accept gifts of any kind with or without economic value. All representatives of NOVA must conduct their private and other external activities and financial interests in a manner that does not conflict with the interests of NOVA. The personal interests of NOVA representatives should not influence their decisions or actions in the performance of their duties.

- Whistleblowing

Our Fundamental Principles and Code of Conduct summarize NOVA's principles and minimum standards for conducting business ethically and in compliance with the law.

You are encouraged to report violations or suspected violations of our Code of Conduct. We encourage you to contact your manager or your manager's manager to raise your concerns. If these options are not appropriate or acceptable, you may use the Complaint/Suggestion boxes to raise concerns about actual or potential violations of our Code of Conduct.

- Protection Against Retaliation

Threats, retaliation and/or discrimination against anyone who reports a violation in good faith are not permitted. Anyone who makes a good faith report or participates in an investigation will be protected against any form of retaliation and may not be fired, reassigned, suspended, transferred, subject to other organizational measures that have adverse effects on working conditions, threatened or harassed, or discriminated against because of a good faith report of wrongdoing.



- Eligibility

We comply with all laws, regulations and standards, and fulfill our responsibilities and obligations to all interested parties.

-Fair Competition

We believe in fair, free and open competition. We do not accept unlawful practices with competitors, customers and suppliers, and any kind of monopolistic or unfair trade practices, bribery and corruption by our company.

- Respect for Society and Environment

In all our activities, we also take into consideration social responsibility, development of the sector and ensuring sustainability in parallel with the image, benefit and profitability of our company.

Together with our employees, suppliers and all stakeholders, it is our sincere decision to provide an accident-free and safe working environment that values people and the environment.

We know that we must comply with ethical principles as a whole in order to protect the success and reputation of our company and we expect all our employees, suppliers, stakeholders and related parties to take care in this respect.

Vedat KARAHANOĞLU

General Manager

19.12.2024