



**CODE OF
ETHICS and
WORKING
PRINCIPLES**

TROY 2022



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Introduction

Ethical principles are universal laws that are not based on a written text, but have been created by people over time, based on human values. Troy Kıymetli Maden Ticareti A.Ş. (Troy) employees act by observing all these ethical rules while fulfilling their duties, determining the rules of the working environment and being aware that they represent the company outside working hours.

Troy's basic principle is to protect its corporate identity in line with these ethical values and to always move forward by improving itself. For this reason, Troy's ethical principles apply to all employees, including the Board of Directors, and our business partners.

1 – Customer Relations

1.1. Know Your Customer

Troy has adopted professionalism as the first principle in serving its customers. The main objective is to complete the customer's transactions smoothly and with the highest benefit. The best way to ensure that is to know your customer. In order to provide the right service and to prevent the laundering of proceeds of crime and the financing of terrorism, 'know your customer' is the most important step we take at the beginning of the transaction.

1.2. Principle of Equality

Troy has adopted the principle of providing the right service to its customers by taking into account its ethical values under the leadership of the 'Turkish Human Rights and Equality Institution Law'. All employees must adhere to these principles and it is our fundamental responsibility towards our customers to provide equal service regardless of religion, language, race, gender, etc.

1.3. Informing Customers

Troy is obliged to transparently disclose information about the transactions that the customer will carry out or has carried out. It avoids using false, misleading and exaggerated language in communication with its customers. Promotional, informative, etc. notifications sent through various communication channels are not carried out without the customer's consent.

1.4. Confidentiality of Customer Information

At the time of account opening, Troy requests in writing whether the customer wishes to authorize transactions to any person other than himself/herself and whether he/she wishes to share transaction information. In case of authorization, it obtains the information and documents of who is authorized from its customers. It is strictly forbidden to share information and documents with third parties other than the authorizations notified by customers. Troy is obliged to disclose information

only upon the request of the customer, the authorized person and legal authorities authorized by law.

1.5. Customer Operations

Troy is obliged to complete the transactions of its customers in a complete and prompt manner in accordance with the authorizations given to it by law. Employees are obliged to be impartial in transactions and refrain from giving directions. If the customer's request is against the law and legislation, the transaction is not carried out.

1.6. Customer Complaints

Troy has established the necessary facilities and channels in its infrastructure for customers to communicate the information, suggestions and complaints they wish to convey. All customer feedback is taken into consideration, approached in a solution-oriented manner and resolved as soon as possible.

2 - Competition

Troy employees refrain from actions that may damage the reputation of its competitors and from accessing data and information of competitors in a manner that is in violation of ethical principles. In this regard, it acts in full compliance with the Competition Law, ethical principles and company policies.

3 - Protection and Confidentiality of Information

All information and documents, financial information, trade secrets, customer-employee information, programs, software system details, agreements and all business models developed by Troy are confidential and are the property of Troy. Employees are obliged to keep this information confidential during their employment and after they leave their jobs, not to share it with third parties and its competitors and not to use it for their own benefit.

4 - Employee Responsibilities

4.1. Manager Responsibilities

Troy managers are first and foremost obliged to comply with the code of ethics themselves. Afterwards, an appropriate environment should be created to ensure that employees are also familiar with this information, and that ethical principles can be developed and discussed. In addition to all these, the following details are also within the responsibilities of managers;

- To create an environment where solidarity and cooperation are essential among employees instead of negative competition,
- To act with a professional approach, free from personal feelings and thoughts, as required by the job,

- To identify information needs for the development of employees and encourage them to attend trainings related to their field of work,
- To be objective and fair in performance evaluation,
- To be open to changes.

4.2. Protection of Company Assets

Troy employees are obliged to use all kinds of tools, equipment, fixtures and infrastructure of the company as required by their job. They should use these equipments efficiently and economically, and should not use them for personal tasks outside of their job. They should take utmost care not to use business privileges such as internet, telephone or e-mail address provided by the company for personal purposes unless it is unavoidable. In addition, it should be known that the passwords in the programs used to perform transactions are within the scope of highly confidential data and should not be shared with anyone.

4.3. Relations with the Public and Regulatory Authorities

Troy prepares and stores all details of its transactions, legal documents and financial information meticulously and in accordance with the legislation. It is obliged to provide all these information and documents in a fast, transparent and complete manner when requested by the authorities. It meticulously monitors the transactions and documents that need to be notified to the official authorities on a regular basis and informs them on time.

4.4. Behavior and Appearance in the Workplace

Troy employees act with the awareness that they represent the company with their behavior and appearance. In this context, they;

- Avoid attitudes and behaviors that may damage the reputation and image of the company inside and outside the company,
- Demonstrate attitudes of courtesy and respect in communication with customers and business partners,
- Avoid extreme actions that may affect the performance or distract the attention of colleagues in the work environment,
- Respect different opinions, and do not make political, religious or personal preferences a subject of discussion in the work environment,
- Do not come to work under the influence of illegal drugs and alcohol, which may affect their work performance and jeopardize work safety

4.5. Use of Intellectual and Commercial Rights

All logos, brands, communication systems, software information belonging to Troy's corporate identity are used only for the company's operations. It is forbidden for any person or persons not affiliated with Troy to use the name, documents or images of the company.

4.6. Insider Trading

Troy employees use all information obtained within the company exclusively for company operations. It is forbidden to share the information belonging to the company with competitors or third parties, and to use it for profit.

5 - Promotions and Gifts

5.1. Acceptance of Gifts and Personal Benefits

In addition to the business relationship between us and our customers and solution partners, there are also situations where we are in social communication. It is perfectly normal to establish these relationships to the extent that they do not harm or alter the course of the business relationship between the two parties. What is essential is that these relationships do not turn into conflicts of interest and do not go to the level of compromising the company's rules of operation. For this reason, Troy employees cannot accept gifts, payments, etc. from its customers and solution partners that serve their own interests, have high value, or behave in a manner that implies this, except for promotional, advertising and reasonable gifts.

5.2. Gifts and Other Benefits to be Offered

Just like the criteria for gifts that Troy can accept, there is also a level and quality to the gifts that it will deliver. Gifts presented to business partners, customers, third parties or public authorities must not cause a conflict of interest between the parties. Gifts with clear boundaries should be presented at the end of the year or on special occasions, such as gifts promoting the company and small gifts promoting our customs and traditions.

On the other hand, small gifts, social organizations, meals, etc. that the company may offer to its employees to increase motivation are gifts at an acceptable level.

6 - Our Responsibilities Towards Our Employees

Troy values the experience and talents of all its employees and respects their differences and ideas. It aims for a professional and happy working environment where its employees can express themselves freely, increase their professional and personal development and where advancement is based on merit.

6.1. Employee Rights

Troy primarily creates a working environment where its employees are entitled to their rights as set out in the legislation. Other matters to which it is sensitive towards are ensuring that everyone works under equal conditions, providing the training environment that will reveal or increase their potential, and ensuring occupational safety. If there is a right that employees believe has not been fulfilled, the notification of this is kept strictly confidential and the employee is not subjected to any discrimination or pressure regarding the matter.

6.2. Impartiality in Recruitment and Promotion

Troy approaches the recruitment process in an impartial manner without discriminating religion, language, race, sect or gender. The main criteria here are the person's aptitude for the job, professional competence and potential suitability for the working environment. Other factors do not influence the decision in the recruitment process.

Likewise, the criteria for promotion are professional competence, level of development, openness to learning and the value that the person can bring to the company in his/her new position.

6.3. Working Hours

Troy takes care to have the appropriate number of personnel for the workload. With an equal workload and adequate personnel, work is completed within daily working hours, and the rights of employees are protected in situations that require overtime. Annual leave is one of the fundamental rights of employees and it is ensured that they use it regularly.

6.4. Preventing Psychological Harassment

Psychological harassment (mobbing) is defined as malicious, negative attitudes and behaviors carried out by one or more persons against another person or persons in work environments, which continue systematically for a certain period of time, intentionally aiming to humiliate, belittle, exclude, damage the personality and dignity of the employee, subject to maltreatment, intimidate, passivate or dismiss the employee; damaging the personality values, professional status, social relations or health of the victim or victims. Such behavior may be performed by superiors to their subordinates, by subordinates to their superiors, or between equals.

Our employees are obliged to stay away from the behaviors included in the definition of discrimination, harassment and mobbing, and they should conduct their relations with each other based on the principle of mutual respect and equal treatment, and act with integrity in the working environment.

The employee who is subjected to psychological harassment should first avoid conflict and try to remain calm. They should report the problem to the senior management and keep information and documents such as correspondence, notes, messages, e-mails that prove that they have been subjected to psychological harassment.

6.5. Employee Health and Safety

Within the scope of Law No. 6331 on Occupational Health and Safety, Troy;

- Makes the utmost effort to fully comply with occupational health and safety legislation to ensure safety in the workplace,
- Keeps the common working and living areas clean and organized, and takes care not to disturb other people,

- In the event of a fire, natural disaster, crisis or emergency that may interrupt the continuity of the business; it knows and implements the emergency plans and its responsibilities, if any, within the scope of business continuity procedures, in order to continue to respond to market and customer needs and to ensure business continuity.

7 - Implementation of Ethical Principles

Our Ethical Principles Policy is monitored by the Compliance Unit under the control of the Board of Directors for its understanding, adoption and implementation. Troy employees are aware of the need to internalize these ethical principles and rules in their individual behaviors, to encourage their implementation throughout the company, to contribute to the creation of a culture of compliance and ethics, to avoid behaviors contrary to ethical principles and rules, and to notify a senior manager if they are aware of situations contrary to these.

8 – Enforcement

This policy entered into force in 2014. The date of the latest revision is 05.09.2022.