



ELIF CODE OF CONDUCT AND ETHICS

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It has been created for common achievements of ELIF and with the aim of developing and maintaining relationships in accordance with mutual common universal values and was approved by ELIF's Board of Directors.

"Acting with principles" is the basic policy in ELIF's activities. The company regards it as an indispensable obligation to stand at the same standard and equal distance to all its customers, suppliers and employees, and considers it as the reason for its existence and development.

For the company, fulfilling the obligations stipulated by laws and contracts in a complete and timely manner and acting based on fairness are before any commercial concerns. This stance is the source of ELIF's reliability and prestige today.

ELIF Code of Conduct and Ethics

It covers the basic behaviour and principles of the company. It is in integrity with ELIF policies, values and principles. It is the responsibility of all ELIF employees and suppliers to implement, follow and maintain these principles, and all employees are required to comply.

ELIF's Employees and Suppliers

Company personnel are obliged to comply with "Business Ethics Principles" while performing their duties. With the awareness that business procedures, standards, laws and regulations may not be a guide for all of our attitudes and behaviours, "Business Ethics" principles have been established based on company values. Suppliers and employees are requested to act in accordance with the basic principles of Business Ethics Rules adopted by the Board of Directors, and globally accepted Integrity, Reliability, Confidentiality, Protection of Trade Secrets, Avoiding Conflicts of Interest.

ELIF employees cannot plan or provide personal benefits for themselves, their family and people in their social circle by taking advantage of their position within the company. They take care to protect the benefit of the company in their business relationships with third parties. They shall not be in close contact with people or organizations who can benefit from business decisions or confidential information they have while working and avoid such actions and behaviours. Suppliers are expected to respect the stated principles.

Conflict of interest occurs when the private interests of the employee and the interests of ELIF conflict. If such unsuitable personal interests arise due to the current position of the employee, no employee shall benefit from the company operations personally, in favour of family members or any relatives. The employees shall not use or make use of the company's property, information and their positions for personal gain.

In order to protect the information assets owned by ELIF and its customers, employees are responsible for the protection of information preserved and used in programs such as QDMS, SAP, etc. in the company information processing infrastructure, and are obliged to act in accordance with Information Security policies and procedures. Suppliers are expected to respect the stated principles.

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ELIF cares for the employees' exchange of gifts from various persons, institutions and organizations with whom they are in contact due to their work and only within the framework of the rules determined within the company and impose sanctions within the framework of the rules determined by the laws.

ELIF employees shall only use company assets for business purposes, protect them and ensure their maximum efficiency. In cases where contrary situations are determined by the employee himself, it is the duty of all ELIF employees to protect and monitor company assets and company employees against third parties, and to ensure their use in line with company interests.

Except for the relevant departments assigned, no employee shall make a verbal or written statement in a way to bind ELIF to 3rd parties.

ELIF employees are required to comply with all laws, rules and regulations within the borders of countries of operation and the relevant laws and regulations of the country at overseas visits.

ELIF Working Principles

ELIF aims to provide a healthy, safe and efficient working environment to its employees.

For this reason:

Behaviours, aggressive attitude, threatening speech and behaviour that disrupt the productivity and confidence of the workplace; harassment and disturbing; promotion for commercial, political or religious purposes are unacceptable.

It is unacceptable for Elif employees to falsify the official documents they prepare while performing their duties.

Employees are obliged to comply with the time and other restrictions specified by the relevant authority in the preparation of official documents.

ELIF Code of Conduct and Ethics is conveyed to every new employee of ELIF through the orientation program and to the employee signs this document to commit that it is understood that these rules will be considered an integral part of the employment contract.

Before entering commercial relations, Elif evaluates the risk of bribery for its business partners, including intermediary institutions, brokers and representatives.

It is ensured that financial transactions are properly handled and recorded, including the management of fraudulent records that are currently being implemented and detected. It is the responsibility and authority of Elif officials to investigate the things to be done to avoid money laundering and reveal similar activities, and even to share them with relevant authorities when necessary.

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Elif is obliged to promptly notify customers of any quality, safety and rule violations or abuses that may have a negative impact on its own business or the business of its suppliers.

At Elif facilities,

A process is available to address fraud and policy violations, including remedial methods (for issues created by employees or suppliers).

In the facility, a process is available which ensures that individuals and organizations (managers, auditors, employees, suppliers, etc.) who are found to have committed a policy violation or abuse, are warned and sanctioned accordance to their crimes or faults. Works are conducted based on voluntarily accepted and documented employment conditions.

All employees in the facility are ensured to receive a contract that specifies the terms and conditions of employment in a local language they can understand and that complies with local requirements.

The facility procedure includes checks to verify that the recruiters provide contracts to all employees and that the employment contracts comply with local legal requirements and state the terms and conditions of employment in a local language that employees can understand.

Employees at the facility are employed under a documented contract signed by the employer and employee.

Changes in employment contracts are made with the written consent of both the employer and the employee. The facility does not impose additional conditions or obligations on the employees after the contract is signed.

The probation period for employees does not exceed the time permitted by local legal requirements. The employer does not repeatedly terminate and re-hire temporary employees in order not to provide them with the same conditions and benefits as payroll employees.

Migrant employees do not pay wages or employment fees to intermediary institutions in their home country or host country to be employed by the facility. The intermediary institutions do not charge employees for mediating employment opportunities at the facility.

The facility has policies and procedures that determine basic managerial functions such as recruitment, grievances, discipline, promotion and dismissal. All management functions that directly concern employees, such as excess workforce, will be performed in accordance with legal requirements and the process will be transferred to employees.

The facility has trained the staff responsible for implementing basic management procedures. Relevant documents such as training records are kept for a certain period.

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Employment terms and conditions and basic management policies, solutions etc. are provided to employees through an employee guide translated into a language they can understand.

Ongoing training opportunities are provided to all employees of all categories in order to increase and develop their skills in their duties. This includes providing apprenticeship programs for young workers where applicable.

Employees of all types have opportunities that keep their way forward in their career.

All Employees Are Treated Equally, Respectfully and With Value

The facility has discrimination policy and procedures conveyed to employees, covering the principle of non-discrimination based on social class, nationality, ethnic origin, religion, age, disability, gender, financial position, sexual orientation, union membership, political affiliation, health or pregnancy.

ELIF is against any discrimination made on the basis of social class, nationality, ethnicity, religion, age, disability, gender, financial position, sexual orientation, trade union membership, political affiliation, health or pregnancy during recruitment, salary, access to training, promotion, dismissal or retirement.

Elif is against discrimination against candidates during the recruitment process with actions such as conducting pregnancy tests.

The selection criteria for all Human Resources decisions are documented each time and applied in a way that prevents arbitrary decision-making (for example, in a way to provide equal education and promotion opportunities for women).

The personnel responsible for recruitment, payment, training, promotion, discipline and dismissal of the employees are trained in a way that avoids discrimination in their duties.

All employees and their managers are trained to detect and prevent harassment, abuse and other forms of intimidation.

Managers, front office managers, production personnel, quality control personnel and security guards are informed to avoid discrimination.

All necessary precautions and requirements are provided in the facility to ensure the safety of pregnant and breastfeeding employees and to meet their needs.

Even if the national/local laws do not require, the company demonstrates due diligence to obtain prior and free-will consent from the communities by notifying them and respecting the changes in land use.

The facility has an individual or a team trained to inform local communities and indigenous peoples and to deal with the principles of prior and free-will consent, or there are individuals with sufficient knowledge to seek outside advice for ensuring that rights are recognized and protected and adequate care is taken.

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The business ethics principles of the facility are based on the prior and free-will consent of the communities by informing them and not unjustly occupying the land.

The facility conducts impact assessment on the rights, resources, lands and regions of forest dwellers, indigenous peoples, small landowners, squatters, migrants and minority groups.

Top management takes due care to show the necessary legal care to know and implement national laws and practices regarding title deeds.

In the facility, the communities have been informed in the last five years and permission is obtained in advance and subject to free will, due to a change in the facility's footprint or an addition to this area.

In the facility, Top Management follows a process to determine land ownership/land rights, including women's right to own land, within the framework of ethical rules.

Elif sends the "Code of Conduct and Ethics" to all of its suppliers and/or declares on the contract its request to comply with this policy shared on the website.

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