

# CODE OF CONDUCT

## **OUR SOCIAL RESPONSIBILITIES**

### ***RESPECT FOR HUMAN RIGHTS***

As Ertunç Özcan Group of Companies, our most important core value is respect for human rights. Being one of the pioneers of medical device production since 1968, our company aims at the highest quality assurance in its field, treats its employees fairly and supports the protection of human rights throughout the entire supply chain, from design to the end of production. We do not make any concessions to any type of threat and violence that may arise against our employees in our company. In addition, all our employees should take care to maintain their relations with their colleagues and our business partners, within the framework of respect for human rights. Our company is responsible for applying the necessary administrative sanctions in the face of any violation of this concept, which is the fundamental right of humanity.

### ***EQUAL OPPORTUNITY, RESPECT FOR DIFFERENCES AND DIVERSITY***

We see diversity as an opportunity and we believe that our diversity will help us to look from different perspectives and integrate them into our activities. For this reason, we provide uninterrupted service at domestic zone and abroad by hosting people from different socio-cultural backgrounds under the umbrella of Ertunç Özcan Group of Companies, with our Technical Service and Sales Offices located in 4 different cities, including Istanbul, Gaziantep, Antalya and İzmir, and our distributors located in different regions like South Africa, the Philippines and Kazakhstan. Based on the “Principle of Equal Treatment” in Article 5 of the Labor Law No. 4857, we support equal opportunities for our employees without discrimination or harassment based on the reasons such as their race, gender, color, national or social origin, ethnic origin, religion, language, age, disability, sexual orientation, gender identity or political opinion. We realize our employee’s recruitment, development throughout their career, training, salary system basing on their qualification, performance, skills and experiences without making any arbitrary discrimination.

### ***QUALITY-FOCUSED SERVICE APPROACH***

As the manufacturer of the newborn product group, we are very sensitive about product quality and reliability, as we touch tiny lives. For this reason, our working principle is to meet the requirements of all legal regulations and reference standards related to our product group in the best way. We care about the satisfaction of our customers at every stage of the life cycle of our products, from designing, development, production to sales and after-sales service, and in order to do better, we always handle feedbacks with innovative solutions.

### ***AWARENESS OF ENVIRONMENTAL PROTECTION***

We know the value of the environment we live in and protect the environment in order to sustain biological life. Our primary goal is to maximize our production performance by using environmentally friendly products and protecting natural resources. In this regard, we measure our carbon footprint periodically and carry out studies to reduce it systematically. In our company, we take care to use electric vehicles as much as possible. We meet our water needs with water purification system, and for irrigation we use the water collected with our rain collection system. With the lean production model adopted in our production facility, we realize maximum production with minimum resources, time and labor.

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## OUR RESPONSIBILITIES TO OUR EMPLOYEES

### ***FREEDOM OF EXPRESSION***

We care about the ideas of our employees and encourage them to express themselves freely. We work in a trust-filled cooperation with our employee representative, and we conduct our uninterrupted dialogue within the framework of mutual respect, taking into account the position of each of our employees.

### ***CHILD LABOR***

We do not employ child labor in our company within the framework of the activities we carry on and the ethical values we adopt.

### ***HEALTHY AND SAFE WORKING ENVIRONMENT***

Our top priority is to take care of the health of all our employees and provide a safe working environment to them. We take steps for continuous improvement by acting proactively against all kinds of work accidents that may occur in the working environment. We conduct continuous trainings to raise awareness of all our employees about occupational safety.

### ***PROTECTION OF PERSONAL DATA AND INFORMATION SECURITY***

As a company, we process and protect the personal data of our employees, collaborators and customers entrusted to us in accordance with the "Personal Data Protection Law No. 6698 (KVKK)". We take all necessary measures to protect all of our information, which emerges as a result of our activities, especially our ideas and work results within the scope of R&D, within the framework of the concepts of confidentiality, integrity and accessibility.

## OUR RESPONSIBILITIES TO OUR COLLABORATIONS

### ***PREVENTION OF BRIBERY, CORRUPTION AND UNFAIR COMPETITION***

We believe in our own assets, services, products and innovative personnel power, and we conduct our commercial activities with the principle of fair competition. We know that the fair competition principle we adopt in our commercial activities always keeps our R&D activities dynamic and gives us an advantage in the market.

While competing with our competitors, we do not provide ourselves an unfair profit or unfair advantage. It is our priority to always be recognized as true, honest and reliable in the market, therefore we do not tolerate and do not accept any offer under the name of bribery. As Ertunç Özcan Group of Companies, we treat employees in public institutions with which we often cooperate carefully, and we do not make any offers that will distract them from the principle of honesty. Likewise, we always remain insensitive to facilitation payments requested to speed things up.

As the pioneers of the sector, we believe in the quality, proficiencies and competitiveness of our products and services. For this reason, we do not tolerate corruption that is attempted directly or through third parties in order to convey our stance in the sector for generations and not to put ourselves under the control of another person or institution.

### ***MANAGING CONFLICT OF INTEREST***

We care about and respect the private lives of all our employees, but we expect our employees to manage possible conflicts of interest in a transparent way, without giving priority to their personal interests, in a commercial decision to be taken for our company.

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## ***CUSTOMS AND EXPORT CONTROLS, TAX MANAGEMENT***

As a worldwide company, we comply with all legal requirements for international trade, as well as our obligations regarding goods and fees. We know that the tax system implemented in our country contributes to the financial infrastructure and expenditures of the state, and we fully fulfill our obligations in the tax legislation. Our company was given the "Income Tax Award" by the Ankara Chamber of Industry (ASO) as the Ankara Income Tax Winner in 2012 and 2017. In addition, in 2018, Polatlı Tax Office presented us with a certificate of appreciation for being among the taxpayers with the highest declaration in Income Tax.

## ***PREVENTION OF MONEY LAUNDERING***

We stand against the payments that serve to include the money earned as a result of the crime factor into the country's economy. We examine all suspicious transactions and report them to official authorities if necessary.

## ***FINANCIAL REPORTING***

We record all our commercial activities in accordance with the relevant laws and regulations. We complete our annual reports, year-end balance sheets and quarterly statements in a timely and accurate manner.

## **REPORTING AND RESOLVING INCOMPLIANCES**

"Speak-up Culture" is very important to protect the ethical values of our company. Raising our voices when faced with a situation that we think is not right demonstrates our integrity and the courage to do what is right. Speaking openly shows that we care about each other and our work.

All of our employees under the umbrella of Ertunç Özcan Group of Companies have right to report the situation they faced that does not comply with the ethical values adopted by our company to their manager firstly and then to Human Resources Department of their own free will.