



ATP YAZILIM VE TEKNOLOJİ ANONİM ŞİRKETİ

CODE OF ETHICS

1. OBJECTIVE

The **Code of Ethics** of ATP Yazılım ve Teknoloji Anonim Şirketi (“**ATP**” or “**Company**”) outlines the principles and rules that the Company adopts in conducting its activities with integrity and respect, upholding its values, and fulfilling its responsibilities toward the community, environment, clients, shareholders, and employees. The Company expects all its executives and employees to adhere to these rules and aims to ensure that they always demonstrate the most ethical attitude.

2. SCOPE

As a general summary of ATP’s Code of Conduct (“**ATP CoC**”), which defines ATP’s ethical values and ethical approach to the outside world, ATP’s Code of Ethics sets the minimum standards. ATP Code of Conduct provides a resource that lays out our ethical and legal responsibilities to our stakeholders, the business world and each other, and represents the core values of our company. ATP CoC applies to the Company and the employees of the companies under its umbrella.

3. RESPONSIBILITY

The Board of Directors has approved the ATP CoC, supporting all endeavors for its implementation. The ATP CoC is reviewed, updated, and published annually, made available to all ATP employees for their acknowledgment. All employees of the Company are expected and required to comply with these principles.

3.1 Management’s Pledge

At ATP, the Board of Directors, CEO, and all managers reporting to the CEO, pledge to:

- Act reliably with integrity and fairness in all our activities.
- Represent our Company properly with open and accurate communication in all settings.
- Continuously support and encourage the employees’ and their own development.
- Extend equal opportunity to all our employees without any bias.
- Adhere to applicable laws, rules, regulations, and legislation in all our activities.
- Embrace and implement the values defined in the ATP CoC.

4. CORE VALUES

- **Responsibility and Respect:** As we move forward in line with our values and strategies, we respect one another, our customers and stakeholders, undertaking all our processes

with a sense of responsibility.

- **Innovation:** We follow the latest technologies, develop new ideas, and drive change. We help our Company, clients, and stakeholders unlock their true potential by leveraging technology.
- **Proactive Communication:** Effective communication is a cornerstone of our activities. We regard diverse approaches as a richness. We establish clear, understandable, and proactive communication with our employees, clients, and stakeholders.
- **Sustainable Development:** Supported by our values, strategies, processes, and solutions, we aim for sustainability in our business, ensuring that knowledge is advanced and shared with next generations.

5. CODE OF ETHICS

5.1 GENERAL RULES

5.1.1. Ethical Principles

- Integrity and high ethical standards lie at the heart of our business.
- We promote teams of creative individuals capable of taking initiative and making their own decisions in an environment where roles are shared with a balanced approach and strategies are clear because we believe that the results they deliver are often higher than the sum of individual results.
- We build long-lasting relationships on mutual trust, transparency, and unity. Individuals who put their own interests before our clients and team have no place among us.
- We define advancement as elevating our know-how, skills, and contribution to the team.
- Success belongs to all of us, and we share achievements objectively.
- We see training on diverse topics as the most important investment we make in ourselves.
- We prioritize our clients' interests. Success represents the end result of service excellence.
- We always remain open, clear, and transparent toward our clients.
- Our ultimate goal is to always provide outstanding service surpassing our clients' expectations.
- We focus on building long-term relationships with our clients. Therefore, we would rather retain our existing clients than acquire new ones.
- We always strive to outdo ourselves. Therefore, we monitor our competitors closely to see how we can set new benchmarks.

5.1.2. Legal Compliance

In all the countries where we operate, we abide by the local and international laws and regulations. Accuracy and legal compliance are essential in financial and commercial records.

We avoid unfair competition and always observe fair competition conditions in our respective industries. ATP employees who are privy to insider information about our activities acknowledge that they are responsible for ensuring the confidentiality of such information until it is announced on the Public Disclosure Platform (KAP). They do not engage in any action that will serve their relatives' or their own interests.

ATP adopts a zero tolerance approach to any form of bribery, corruption, and money laundering. Facilitation payments must not be offered under any circumstances.

ATP adheres to applicable laws and regulations regarding intellectual property rights and copyrights.

ATP stands resolutely against child labor and forced labor. We expect all our suppliers and business partners to adopt the same approach.

5.1.3. Data Security/Privacy

ATP complies with data security, data protection, and privacy policies in all processes. Confidential information is defined as information (including financial, strategic, technical, commercial information, personnel rights, topics addressed within the scope of non-disclosure agreements with third parties, etc.) that belongs to the company and is not available to third parties, that may cause damage to the company and/or its stakeholders or benefit others if it becomes publicly available.

The employees exercise due diligence in protecting the information belonging to the company and all its stakeholders. They are prohibited from disclosing confidential information to third parties when they leave the company.

All official statements are announced to investors, shareholders, and the public simultaneously in an equitable, complete, and understandable manner through the departments units assigned to the task by the Company.

5.2. UTULIZING COMPANY ASSETS

All monetary and non-monetary assets of the Company should be utilized with utmost care and due diligence. These assets must not be utilized for personal gain, spending, gifting, political donations, etc.

5.2.1. Workplace and Respecting the Environment

We are all responsible for maintaining a safe, non-threatening and healthy workplace, respecting the environment, and conserving natural resources. We do not compromise safety precautions for anyone, including our employees, while performing a task. We adhere to all applicable environmental, health, and safety regulations. We aim to foster environments where people feel safe and are always treated with courtesy and professionalism.

Employees should familiarize themselves with all safety and security guidelines, follow them, and report any safety violations or workplace accidents. Violence against another individual or company property must be reported immediately. Safety procedures must be followed without exception and unsafe working conditions must be reported to line managers.

ATP will not tolerate any incidents of employees using, possessing, or being under the influence of alcohol or drugs, whether during or outside of office hours, on the Company- owned or leased premises, or while using company property. It is essential to maintain sound judgment to avoid endangering others. No employee will be allowed to engage in work for ATP while under the influence of or impaired by alcohol or drugs.

All waste disposal should be conducted in accordance with Company policy and applicable regulations. Recycling should be preferred wherever possible.

5.2.2. Time Management

Time is an invaluable asset for the Company. Our employees use their time wisely and do not spare time for personal matters during office hours. Similarly, managers do not assign their personal business to their subordinates. Organizers are responsible for ensuring the effectiveness of the time allocated for their meetings, while all participants should come prepared and respect the start and end times.

5.2.3. Company Vehicles

Our employees, who are assigned company vehicles, exercise caution and care during driving.

5.2.4. Communication Tools

Email should only be used for business purposes and personal communications should be avoided.

To the extent possible, email should be preferred over phone calls.

Fax machine, copier, internet connection, and similar tools devices should not be used for personal purposes whenever possible.

5.2.5. Stationery and Fixtures

The stationery and fixtures provided by the Company should be used with care based on savings principles. Employees leaving the company should return all valuables, documents, and fixtures in their custody with a report.

5.3. RELATIONSHIPS

5.3.1. Relations with the Company's Commercial Partners, including Individuals, Companies, and Institutions

All employees should engage in proper, consistent, reliable, helpful, and punctual relations with suppliers/vendors, business partners, and clients.

In supplier/vendor selection, objective criteria, including benefit/cost, should be taken as basis and influence by anyone should be avoided.

5.3.2. Media Relations

Giving a statement or interview to the media, and participating as a speaker in seminar or conferences, etc. are subject to the approval of the senior management. No personal gain can be obtained from such activities.

5.3.3. Relations with Public Authorities

Relations with public authorities are conducted within the framework of applicable laws and company policies/procedures. Information requested by public officials should be provided accurately and on time.

5.3.4. Shareholders

At ATP, our primary mission is to create sustainable economic value for all our stakeholders. Therefore, we aim to look after the interests of all our stakeholders.

In designing internal activities, the interests and rights of stakeholders are considered equitably and fairly.

The goal is to create value for all stakeholders.

All company activities are conducted with financial discipline and accountability.

Disclosures to the shareholders and the public should include accurate, timely, complete, and understandable information on financial statements, company strategies, and investments.

5.4. EMPLOYEES' OBLIGATIONS TO THE COMPANY

5.4.1. Conflicts of Interest

A conflict of interest occurs when an employee engages in business dealings with a family member or a close affiliate and their impartiality is affected in terms of doing the best for the company. ATP employees are responsible for not using the Company's resources, name, and power for their personal benefit and for avoiding situations that might damage the Company's reputation and image.

ATP employees, executives, and Board members should avoid any initiative that may be construed as creating advantages for themselves or their relatives. Positions within the company or information on the Company's products and services should not be leveraged for personal benefit.

In case of a conflict of interest between clients/suppliers, all parties are treated equitably and fairly.

ATP employees strive to perform their duties impartially at all times.

5.4.2. External Engagements and Duties

The employees will not accept any official or private, indefinite or temporary, paid or unpaid external assignments or engage in trade without the Company's permission.

5.4.3. Discrimination

Executives and employees treat everyone equitably and fairly without bias. No one will be

subjected to discriminatory treatment due to their age, language, race, nationality, health conditions, gender, marital status, religion and sect, political opinions, or philosophical beliefs. The Company may impose sanctions, up to and including termination of employment contract, on the employees who violate these rules.

6. RESOLUTION OF ETHICS VIOLATIONS

Employees, who violate the Code of Ethics or Company policies and procedures, will be subject to various disciplinary actions, up to and including termination of employment contract. Disciplinary actions may also be imposed on individuals who witness, condone, or encourage inappropriate behaviors and violations of ethical rules and fail to properly report them.

6.1. ETHICS COMMITTEE

6.1.1. ATP Ethics Committee

The Ethics Committee consists of five members of senior management. The Compliance Director serves as the rapporteur of the Committee. Members can be added to or removed from the Committee with the approval of the Board of Directors.

6.1.2. Ethics Committee's Duties

The Ethics Committee is responsible for investigating and resolving complaints and reports regarding violations of the ATP Code of Ethics.

In their duties within the Ethics Committee, members act and make decisions independently of their roles and hierarchy within the organization.

The violations reported to the Ethics Committee are handled, investigated, and resolved in strict confidence. The imposed sanctions are carried out by Human Resources and, the Legal Department, when needed, and recorded in the personnel file of the employee who committed the violation.

The Ethics Committee initiates the actions required to eliminate the root causes identified as a result of the investigations and follows the results through.

6.1.3. Ethics Committee's Meeting and Resolution Procedures

When a Code of Ethics violation occurs or becomes known, the incident should be reported to the ethics line email at etik@atp.com.tr.

Additionally, if written notifications submitted to the request and suggestion email box contain reports of Code of Ethics violations, Chief Human Resources Officer forwards such incidents to the ethics line.

Anonymous reports submitted to the Ethics Line are also reviewed seriously and resolved by the Ethics Committee, through the same process as other reports from known sources.

6.1.4. Ethics Committee's Authority

To properly evaluate and conclude the files and documents under investigation, the Ethics Committee is authorized to:

- a) Examine the criminal records of the individuals under investigation.
- b) Request/obtain information from the relevant authorities.
- c) Hear witnesses and experts directly.
- d) Hear the defense of the employee under investigation.
- e) Conduct other investigations and research.

If necessary, the Committee may seek expert opinion and consult experts by taking measures not to breach confidentiality during the investigation.

7. EFFECT

This policy is publicly disclosed on the Company's website following the approval of the Board of Directors. The opinion of the Company's Senior Management will be taken into consideration in all matters not addressed herein.