



CODE OF CONDUCT

TABLE OF CONTENTS

MESSAGE FROM THE CEO

PAGE 01

MESSAGE FROM TEMSA EXECUTIVE BOARD

PAGE 02

ABOUT TEMSA

PAGE 03

OUR MISSION AND VISION

PAGE 04

OUR VALUES

PAGE 05

COMPLIANCE POLICY

PAGE 07

ETHICS REPORTING PLATFORM CONTACT INFORMATION

PAGE 18





MESSAGE FROM THE CEO

Dear Colleagues and Business Partners,

OUR WORLD GOES THROUGH A SIGNIFICANT ECONOMIC, SOCIAL AND ECOLOGICAL CHANGE AND DEVELOPMENT AND TEMSA CONTINUES TO BE A CATALYST NOT ONLY FOR THE SUSTAINABILITY OF ITS COMMERCIAL ACTIVITIES BUT ALSO FOR THE PROTECTION OF THE ECOLOGICAL BALANCE WITH ITS ENVIRONMENTAL PRODUCTS IT DEVELOPS AND MANUFACTURES, FOR THE SUPPORT OF LIFE AND FOR THE CONTRIBUTION TO THE SOCIETY WITH SOCIAL RESPONSIBILITY PROJECTS BY FOLLOWING THE SAID GLOBAL CHANGES AND DEVELOPMENTS CLOSELY. OUR SUSTAINABLE PRODUCTS AND SERVICES IN VARIOUS SECTORS SUCH AS ELECTRIC VEHICLES, ALTERNATIVE FUEL VEHICLES, POWER DISTRIBUTION UNITS, VEHICLE CHARGING STATIONS AND VEHICLE CHARGING PORTS ARE SOME OF OUR LOW CARBON AND INNOVATIVE SOLUTIONS. WE DEFINE OUR COMPANY, WHICH EMPLOYS MORE THAN 1,7000 PEOPLE, AS A PEOPLE-ORIENTED TECHNOLOGY COMPANY THAT LEADS IN GREEN TECHNOLOGY, ADOPTING AS A FUNDAMENTAL PRINCIPLE IN ALL LEVELS OF ITS CORPORATE ACTIVITIES THE PROVISION TO ALL EMPLOYEES OF AN INCLUSIVE, EGALITARIAN, HEALTHY, TRANSPARENT AND SAFE WORKING ENVIRONMENT WITH BUSINESS ETHICS, COMPLIANCE PRINCIPLES AND COMMON VALUE CULTURE.

We invest in development programs that strengthen the employment of our talented employees, both in our offices and in our production lines. We attribute great importance to the participation of sensitive groups such as young, women and disabilities in the workforce; and to strengthen them, we carry out projects with industrial-university business associations as well as projects that our employees join voluntarily.

As TEMSA, we care to create with our people-oriented approach, a business environment where all our employees feel valued and are free to express their ideas. We encourage all of our internal and external stakeholders to share their compliance or ethical concerns with our 24/7 accessible Ethics Reporting Platform.

We are proud to fulfil our responsibilities related to the compliance, corruption, environment, human rights, workforce, ethic and sustainable purchasing with our strong ethical culture and values. We will continue to maintain our activities with the mission of providing added value to the world and society in the axis of ethics, honesty, transparency, solution orientation, passion, ownership, sustainability, innovation and active participation values.

We accept the Ethics and Compliance, sustainable business practices, human rights, labour rights, environmental protection and the fight against corruption as our basic principles in all our business processes. In accordance with our Compliance Program and the United Nations Global Compact, which we have signed, we are seriously committed to act with honesty in all our commercial relations, to adopt fair competition in the market, to safeguard personal data, to protect

and respect intellectual property rights, to act with ecological and social responsibility, to monitor trade controls that regulate our global business, to maintain the equal opportunity, to do our business correctly and to act with justice and respect, and we plan our business processes meticulously in this axis.

We undertake to act in accordance with the rules as detailed hereinbelow in our relations with all our internal and external stakeholders with TEMSA's Code of Conduct and, and we expect the same approach and care from all our stakeholders.

The Code of Conduct is a summary of our values, Ethics and Compliance principles, corporate policies and standards that guide us while fulfilling our responsibilities as TEMSA. This is not only for ourselves, but also our commitment to all our stakeholders, employees and business partners.

We encourage you to consult our Code of Conduct frequently, especially when you need guidance on how to make business decisions. Our Code of Conduct clearly articulate your responsibilities and let you know how to raise a concern when you have one.

We believe that all TEMSA employees significantly contribute to the culture of Ethics and Compliance. By always adhering to our Code of Conduct, as TEMSA, we can continue to make significant contributions to our world and society with our vision of being a people-oriented technology company that offers sustainable mobility solutions.

EVREN GÜZEL
CEO

MESSAGE FROM TEMSA EXECUTIVE BOARD

*Esteemed
stakeholders,*

OUR FUNDAMENTAL PRINCIPLES ARE AT THE CENTER OF OUR VISION, THE PURPOSE OF WHICH IS TO DISPLAY A LEADING PERFORMANCE. THE VISION WE HAVE; OVER AND BEYOND OUR SALES, TARGETS OR MARKET SHARE, IS ABOUT ACTING IN A WAY THAT PEOPLE KNOW THAT THEY CAN RELY ON US TO DO THE RIGHT THING.

We are all responsible for the success of TEMSA. This is why we always comply with applicable rules, laws and core ethical values. While complying with the laws and regulations that are binding on our industry is a critical first step, we are expected to do the right things, the right way, every day. For this reason, compliance is essential for TEMSA and sustainable success.

Our Code of Conduct are the cornerstone of our compliance program. These rules are built on the principles and values of our company. These rules, which are the criteria for our actions and behaviors both inside and outside the company, also explain our expectations and responsibilities towards the people with whom we do business.

As a people-oriented technology company, we are guided by our ethical principles in our business activities. Within the framework of TEMSA's corporate culture, each employee has the responsibility to always act in accordance with ethical values. Acting ethically and with integrity helps us earn the trust and respect of the people we serve and work with.

Code of Conduct is an indispensable resource for all TEMSA employees. These rules outline TEMSA's policies regarding business conduct, and define who can answer any questions you may have about Ethics and Compliance issues.

All members of the Executive Board are committed to full compliance with the laws and the Code of Conduct. Therefore, we expect you to comply with applicable laws, regulations and these rules at all times during your employment.

TEMSA Executive Board

ABOUT TEMSEA

TEMSEA, ONE OF THE WORLD'S LEADING BRANDS IN THE MANUFACTURING OF BUSES, MIDIBUSES AND LIGHT TRUCKS FOR MORE THAN 50 YEARS, IS CURRENTLY OPERATING IN THE PARTNERSHIP WITH SABANCI HOLDING AND PPF GROUP (SKODA A.S.), AND EXPORTS VEHICLES TO MORE THAN 50 COUNTRIES ON MANY CONTINENTS.

As TEMSEA, which was established in Adana in 1968, we are one of the leading bus and midibus manufacturers in Türkiye and the world, with more than 55 years of experience. We have a total production capacity of over 10,000 vehicles, including 4,000 buses and midibuses, and 6,000 light trucks (annual/single shift).

We are located in 66 countries of the world with approximately 66 thousand vehicles that we have developed with 100% Turkish engineering. We conduct our overseas activities through our companies located in the USA, Germany and France; respectively, TEMSEA North America Inc., TEMSEA Deutschland GmbH, TFR SAS. We offer sales, after-sales services, service and spare parts services to our foreign and domestic customers. Within the scope of our R&D activities at TEMSEA; in addition to electric vehicles, autonomous vehicles and battery technologies, as well as we work on alternative fuel technologies such as hydrogen.

We have made our commitment to the Science Based Targets Initiative by calculating our emissions from our activities and products according to the 1.5 degrees in 2030 scenario. By obtaining a renewable energy certificate in 2022, we use 100% renewable clean energy in our electricity consumption. We received the Basic Level Zero Waste certificate in 2020 with our efforts towards production with a circular economy and zero waste approach.

In addition to environmental sustainability issues, we continue to make a difference in social sustainability issues. As a result of the work we carried out with Çukurova University Collaboration Projects in 2021, a social impact of 14.18 TRY was created on our SROI score. We continue to touch the lives of disadvantaged groups with our efforts "We Removed Barriers in Career", Ada Sokağı Sports Club, TEMSEA Art and Dream Partners Association.





OUR MISSION



TEMESA'S MISSION IS TO BECOME THE WORLD'S LEADING TECHNOLOGY COMPANY WITH ITS STRONG ETHICS CULTURE AND PEOPLE-ORIENTED WORK THAT PROVIDES SMART AND SUSTAINABLE MOBILITY SOLUTIONS FOR MORE PLEASANT JOURNEYS.

TEMESA'S GOALS:



**BECOMING THE WORLD'S
LEADING MOBILITY
COMPANY**



**BECOMING ONE OF THE
WORLD'S LEADING
CUSTOMER-ORIENTED
ENTERPRISES**



**DESIGNING THE NEW
GENERATION MOBILITY
SOLUTIONS OF FUTURE**



**CREATING SOLUTIONS
THROUGH INNOVATION**



**PROVIDING VALUE ADDED
TO THE SOCIETY IN LABOR,
ENVIRONMENT AND HUMAN
RIGHTS ISSUES WITH A
STRONG CULTURE OF
ETHICS AND COMPLIANCE**

OUR VISION



TEMESA, WHICH CONTINUES ITS ACTIVITIES WITH THE VISION OF BEING ONE OF THE GAME CHANGER COMPANIES IN THE WORLD IN THE FIELD OF ELECTRIC VEHICLES, TOGETHER WITH THE TECHNOLOGY POWER AND KNOWLEDGE BASE OF ITS SISTER COMPANY SKODA A.S., CONTINUES TO EXPORT ITS ELECTRIC VEHICLES TO CITIES WHICH ARE HIGHEST IN THE SUSTAINABILITY LEAGUE OF EUROPE. TEMESA CONTINUES COMMERCIAL ACTIVITIES IN MANY DIFFERENT REGIONS, IN AREAS RANGING FROM ELECTRIC VEHICLES TO AUTONOMOUS VEHICLES, FROM POWER DISTRIBUTION AND VEHICLE CHARGING UNIT PRODUCTION TO CHARGING STATIONS AND IT IS UNITED IN ITS COMMITMENT TO COMPLIANCE WITH LEGAL REGULATIONS, INTERNATIONAL AGREEMENTS, CODE OF ETHICS AND FAIR-TRADE PRINCIPLES.





OUR VALUES



INTEGRITY AND HONESTY

Integrity and honesty are our primary values in all our business processes and relationships. We act with integrity and honesty in our relations with our employees and all our stakeholders. We carry out all our activities strictly in accordance with the legislation.

RESPECT

We achieve our common goals primarily by respecting each other and working together.

SOLUTION-ORIENTEDNESS

As TEMSA employees, we do not leave the problems of our customers unsolved and we embrace the gray areas. We anticipate problems and offer proactive and rational solutions.

INNOVATION

We continue our activities by creating permanent advantages in the fields of brands, patents, technology, design, information network, intellectual and industrial property.

STRATEGIC APPROACH

We are progressing by planning our future in a way that will perfectly manage our current business and provide long-term advantages.

TRANSPARENCY

As TEMSA employees, we attach importance to sharing information with the right people at the right time. We share the impact of new developments on our business. We honestly tell the truth and believe in the importance of effective feedback.

PASSION AND EMBRACING

We take pride in the achievements in our work that we carry out with passion. While doing our job, we act in accordance with our ethical culture and become good role models for everyone. We always support our employees who make a difference.

RESPONSIBILITY

We act with a sense of responsibility towards society, the future and nature. We carry out corporate governance with our core values of respect for people and awareness of social responsibility.

ACTIVE PARTICIPATION

We adopt a management approach that encourages common sense in decision-making processes.

SUSTAINABILITY

We focus on making our current investments more sustainable and identifying our next-generation growth areas in sustainable and high-tech business areas.

WHY DO THE TEMSA CODE OF CONDUCT EXIST AND WHO DO THEY COVER?

As Temsa, in all our activities and behaviors, as human and responsible employee we accept the search for the truth as the first principle for our society, our country and our company.

In this perspective, TEMSA Code of Conduct set out the basic standards regarding the values, principles and ethical rules adopted by our company in its activities. These rules have been determined within the framework of ethical values such as integrity, honesty, respect, solution-orientedness, transparency, passion and embracing, responsibility, innovation, active participation, strategic approach and sustainability, which are important for our company's success and reputation in the sector.

These rules apply to our employees as well as our third-party business partners such as our authorized TEMSA dealers and services, our customers, our suppliers, our shareholders, our managers, our representatives, etc. They are also expected to act in accordance with the TEMSA Code of Conduct in their business and transactions.

**TEMSEA CODE OF CONDUCT
OUTLINE THE FUNDAMENTAL
STANDARDS REGARDING THE
VALUES, PRINCIPLES AND ETHICS
THAT OUR COMPANY ADAPTS IN ITS
ACTIVITIES.**



COMPLIANCE POLICY

As TEMSA, we carry out all our actions and operations in accordance with the local legislation and the basic principles of universal law in the countries in which we operate.

As TEMSA, besides complying with the legislation, we also act in accordance with the principles and rules outlined in the TEMSA Code of Conduct, which we have prepared in line with the Sabancı Holding Code of Ethics (SA-Ethics) and the Skoda A.S. Ethics Principles.

We expect our employees and business partners to act with the same sensitivity in their work and actions, in their work and actions with our company, and in addition, in the business and actions they perform on behalf of our company.

Behaviors contrary to the legislation and TEMSA Code of Conduct may result in the termination of the commercial relationship between us and our business partners, as well as the execution of disciplinary processes against our employees. When necessary, violations can also be reported to official authorities. If you, as a TEMSA employee or business partner, become aware of any business or action

that violates the legislation or the TEMSA Code of Conduct, we kindly request you to notify our Ethics Hotline. We would like to point out that all notifications to our Ethics Hotline will be kept confidential.

HOW TO ACT IN CASES WHERE LEGISLATION CONFLICTS WITH TRADITION?

As TEMSA, we operate in many regions. We respect traditions and are sensitive to the traditions of the community in all regions where we operate.

However, we would like to state that, if any tradition conflicts with universal laws, legislation in force in the region or the TEMSA Code of Conduct, this tradition will not be accepted by us and the practices in accordance with this tradition will not be accepted by our company.



IF THERE IS A DILEMMA ABOUT WHETHER OR NOT THE BUSINESS OR ACTION TO BE DONE IS RIGHT, HOW SHOULD YOU ACT?

In some cases, there may be a dilemma about whether the business and action to be done comply with the TEMSA Code of Conduct. In this case, employees are required to ask themselves the following questions.

- Does my behavior comply with the legislation and TEMSA Code of Conduct?
- Will my behavior harm TEMSA's reputation or mine?
- Am I prepared to take responsibility for all the consequences of my behavior?
- Can I easily explain my behavior to senior management and the court?
- If my behavior and its consequences are reflected in the media, will the public, my family, friends and loved ones think that what I am doing is right?

If the answer to any of these questions is negative or if you are hesitant to answer, you should apply to the Risk and Compliance Department or the TEMSA Ethics Committee.

In case of doubt later that a certain behavior or decision of yours is wrong, you should notify the Risk and Compliance Department or the TEMSA Ethics Committee to take the necessary precautions instead of hiding the situation. In this way, it may be possible to prevent the consequences or reduce the harm that may occur as a result of your decision or action.

TO WHERE SHOULD NOTIFICATIONS AND QUESTIONS RELATED TO NON-CONFORMITY BE SENT?

As TEMSA, it is our priority to carry out all our business and activities in accordance with the TEMSA Code of Conduct, the policies and procedures published by our company, and international legislation. An Ethics Hotline has been set up at our company so that third parties such as our employees, authorized TEMSA dealers and services, customers, suppliers, shareholders, managers, representatives, business partners, etc. may ask questions about compliance or notify us about non-compliances.

The questions you ask us and the notifications you make are of great importance in controlling the compliance of the business and transactions of our employees and those with whom we have commercial relations with our rules. For this reason, you are expected to notify us via the Ethics Hotline in cases when you encounter any non-compliance that violates the TEMSA Code of Conduct, our company's policies and procedures, or the provisions of the legislation, or when you witness unethical behavior, etc.

Every question you ask and every report you make through the Ethics Hotline will be taken into consideration by our company with sensitivity and finalized and resolved with great confidentiality (anonymously upon request) in line with our company's internal functioning and procedures. After the process is finalized, the concerned person is informed of the result.

In the investigations carried out following the notifications made through the Ethics Hotline, there will be no sanction or retaliation in any way against those who did not participate in activities that constitute non-compliance/violation and those who cooperate with our company. Actions to the contrary will constitute a violation of the TEMSA Code of Conduct. For this reason, if you detect or witness any non-compliance, we request that you notify us without hesitation of retaliation or sanctions against you.

OUR RULES

RESPECT FOR WORKERS AND HUMAN RIGHTS

As TEMISA, we are determined to respect internationally recognized human rights in our commercial activities, as stated in the United Nations Declaration of International Human Rights and the Declaration of Fundamental Principles and Rights of the International Labor Organization.

As TEMISA, we defend the human rights of our employees and approach them in accordance with the value and respect they deserve, as accepted by the international community. We respect differences in religion, language, denomination, ethnic origin, race, gender, sexual orientation, age and physical disability of the individuals who work in our company and have commercial relations with our company. The principle of diversity and inclusion is adopted within the company and any act that may constitute discrimination is strictly prohibited. We expect TEMISA employees to act in line with this principle and encourage each other in this regard.

In our general communication style, we take care to develop relationships based on mutual respect with all our customers, suppliers and business partners we are in contact with, in accordance with our value of being "reliable and reputable". We observe the balance between business life and private life.



FAIR EMPLOYMENT PRACTICES

We carry out recruitment, promotion and reassignments in the workplace by looking at the competencies that make a concrete contribution to business development and the development of the team, and we observe an

equal employment policy. In our general manner of communication, we take care to develop relations based on mutual respect with all our customers and business partners we are in contact with.

PREVENTION OF CHILD LABOR

As TEMISA, we comply with all applicable child labor laws, including the minimum age of employment or the age to complete compulsory education, whichever is higher. In

this context, it is strictly forbidden to employ child laborers within TEMISA, and we expect the same sensitivity to be shown by those with whom we have commercial relations.

PREVENTION OF FORCED LABOR AND ABUSE

As TEMSA, we prohibit all kinds of forced labor and act in accordance with the relevant legislation. We expect our employees and those with whom we have commercial relations to be mindful of this issue. If deemed necessary,

relevant persons may be subjected to review by our company in terms of compliance with the legislation and company procedures.

PREVENTION OF MOBBING AND WORKPLACE HARASSMENT

As TEMSA, we are sensitive and determined to provide our employees with a workplace free from all forms of harassment. TEMSA does not allow harsh or inhuman treatment or threats of any kind, including mental pressure, physical pressure or verbal abuse in its workplace or any activity related to it.

We do not tolerate systematic and planned behaviors that can be evaluated within the scope of psychological harassment (mobbing) which aims to alienate a targeted person from work, reduce their performance, or cause them to resign.

ENSURING OCCUPATIONAL HEALTH AND SAFETY

As TEMSA, we attach great importance to ensuring the occupational safety of our employees, protecting their health and creating a safe working environment in the workplace. In this context, all the necessary technical and administrative conditions are duly fulfilled by our company within the framework of the legislation on

occupational health and safety. Regular inspections of our employees are carried out so that they do not endanger the safety or health of other employees, and disciplinary processes can be implemented against the relevant employee in case of detection of dangerous behavior.



AS TEMSA, WE ATTRIBUTE GREAT IMPORTANCE TO ENSURING THE OCCUPATIONAL SAFETY OF OUR EMPLOYEES, PROTECTING THEIR HEALTH AND CREATING A SAFE WORKING ENVIRONMENT

RESPECTING THE RIGHT OF PRIVACY AND PROTECTION OF PERSONAL DATA

As TEMSA, we respect the private and family life and personal spaces of all our employees, employee candidates, business partners, visitors and customers. In all activities that require the processing of personal data, our company acts in accordance with the policies and procedures prepared for the Protection of Personal Data. The personal data of our employees, employee candidates, business partners, visitors and customers are processed in a limited and measured manner for

the purpose of processing, in accordance with the legislation, within the scope of the business relationship between our company and the relevant data subject. Required technical and administrative measures are taken in order to prevent issues such as the disclosure of personal data for purposes other than processing and their access by unauthorized third parties. We expect the same sensitivity to be shown by those with whom we have business relations.





CONFLICT OF INTEREST

Employees are required to act in a way that is pursuant to the interests of TEMSA while performing their duties. A conflict of interest may exist if the employees engage in activities and actions, which are contrary to the interests of TEMSA, but may be in the interest of themselves, their relatives or third parties.

Employees should avoid such actions, act in accordance with their duty of loyalty and care, and report any transactions that may be considered as a conflict of interest, if possible, before starting these transactions.

EXCHANGING OF GIFTS AND RECEPTIONS

Exchanging gifts, receptions and hospitality are considered a sign of goodwill and strengthening relations with business partners and are considered a tradition in many regions. However, there is a possibility that exchanging gifts, receptions and hospitality may result in employees making decisions contrary to the

interests of TEMSA, causing conflicts of interest, and being considered as bribery when carried out in relations with public personnel. Therefore; we would like to point out that exchanging of gifts, receptions and hospitality processes should be carried out in accordance with the TEMSA Gifts, Receptions and Hospitality Policy.

ANTI MONEY LAUNDERING AND COUNTER TERRORIST FINANCING

Laundrying the proceeds of crime is the act of deliberately concealing the source of black money to make it usable by giving a legitimate appearance to the income obtained from illegal activities. TEMSA fights against actions

of money laundering, and legitimization of crime or terrorism. It states that all its suppliers must also comply with this issue.



SANCTIONS, IMPORT AND EXPORT REGULATIONS

There are regulations in international and local legislation that restrict export and import transactions to be made with various countries, regions, individuals and working with various financial institutions. Since TEMSA has to comply with the import and export regulations of the countries in which it operates, it carries out its transactions in accordance with these regulations.

All our business partners, especially suppliers, authorized dealers and services, must also act and carry out their commercial activities in accordance with import and export regulations.

TEMSA undertakes to carry out an effective due diligence program to eliminate third-party risks. In line with this commitment, TEMSA has developed internal control mechanism applications with the Customer/Supplier Diagnosis Form, which includes the details of the Third Party Due Diligence Procedure.

COMPLIANCE WITH FAIR COMPETITION AND COMPETITION LAW PRINCIPLES

TEMSEA has made it one of its core principles to act in %100 compliance with competition laws in all the countries where it operates and work diligently to provide such compliance. Compliance with competition law is a fundamental criterion that shapes every decision at TEMSEA and ensures that all of its relationships are conducted in a fair and transparent manner. In this context, TEMSEA is committed to adhering to legal frameworks and competition regulations in every market it operates, and refrains from engaging in any practices that may prevent, distort, or restrict competition.

The key principles of competition law compliance are as follows:

- TEMSEA does not engage in or seek to engage in practices that would restrict, distort, or limit competition in its relationships with competitors, customers, or suppliers, and actively avoids any actions that could lead to such outcomes.
- TEMSEA makes all business decisions independently, based solely on its own assessments, ensuring that no competitive decision is made through communication or collaboration with competitors.
- When gathering competitive information, TEMSEA uses only publicly available information or data obtained within the limits of the law. Directly acquiring information from competitors, sharing confidential or proprietary information, or using such information for trading with competitors is strictly prohibited. TEMSEA always refers to the source for any competitive information gathered.
- TEMSEA provides continuous training and updates to its employees and business partners in relation to competition law. These training sessions are designed to ensure full legal compliance and promote adherence to these principles at all levels of the organization. Each department receives training tailored to the specific nature of its operations, helping employees make informed decisions that align with competition law.
- TEMSEA ensures compliance with competition law in its participation in trade associations and joint collaboration processes, promoting fair and lawful competition.

For detailed information, please refer to TEMSEA's [Competition Law Compliance Procedures and Guidelines](#).



THE FIGHT AGAINST BRIBERY, CORRUPTION AND ALL ACTS OF MISCONDUCT

TEMSEA acts in accordance with the Public Ethics Legislation in its relations with public officials.

It is considered bribery to provide or offer a benefit to a public official for the public official to do or not do a job contrary to the requirements of the public official's duty.

A zero-tolerance policy against bribery and corruption has been adopted by TEMSEA. It is forbidden for TEMSEA employees to give any gifts, receptions and hospitality to public personnel that can be seen as bribery. All gifts, receptions and hospitality to be given by TEMSEA employees must comply with the TEMSEA Gifts, Receptions and Hospitality Policy.

TEMSEA will never issue an order to any of its employees to bribe or engage in corruption. In the event that a TEMSEA employee detects any violation of legislation and the TEMSEA Code of Conduct concerning bribery and corruption, this should be reported to the Risk and Compliance Department or the Ethics Committee immediately.

All business partners of TEMSEA are also required to act in accordance with TEMSEA's zero-tolerance policy against bribery and corruption.

If TEMSEA employees or business partners take any action that is against TEMSEA's zero-tolerance approach to bribery and corruption, TEMSEA will not be liable for this unlawful act under any circumstances.

TEMSEA never accepts acts that can be described as bribery or corruption as a tradition or method in which business is conducted in a country.

As TEMSEA, we protect the assets of all our stakeholders and Business Partners. We do not tolerate any activity involving theft, fraud, embezzlement, cheating, collusion, forgery, insider trading, or abuse of third-party property. We provide only true and accurate information as part of our work or marketing activities and ensure that transaction flow records are complete, accurate and auditable in line with our transparency policy.



INTELLECTUAL PROPERTY

We request from our employees, and those with whom we have commercial relations to protect our intellectual and industrial property values, including but not limited to patents, utility models, inventions, designs, logos, brands, written and printed documents and know-how,

in accordance with the legislation; and not to use these for any purpose which is outside the scope of their relationship with our company or illegal.

PRIVACY AND DATA SECURITY

Within the scope of our activities, great importance is attributed to taking all necessary technical and administrative measures to ensure the security of information obtained from third parties, including employees, or belonging to our company; and confidentiality undertakings are signed with the persons to be shared in case confidential information is shared. Confidential information will not be used, distributed

or transferred to third parties in any way other than the subject and purpose of the relationship with our company. We expect our employees and those with whom we have commercial relations to be sensitive in this regard and to act in accordance with our Information Security Policies and confidentiality commitments to keep all confidential information secure and to prevent third parties from accessing confidential information and data.

CONFIDENTIAL INFORMATION WILL NOT BE USED, DISTRIBUTED OR TRANSFERRED TO THIRD PARTIES IN ANY WAY OTHER THAN THE SUBJECT AND PURPOSE OF THE RELATIONSHIP WITH OUR COMPANY.





TEMSEA ACTS IMPARTIALLY TOWARDS ALL THE POLITICAL VIEWS IN THE COUNTRIES IT OPERATES IN, AND DOES NOT ENGAGE IN ANY ACTIONS LIKE MAKING DONATIONS TO ANY POLITICAL PARTY OR MOVEMENT.

POLITICAL ACTIVITIES

TEMSEA acts impartially towards all the political views in the countries it operates in, and does not engage in any actions like making donations to any political party or movement.

TEMSEA respects the individual political views of its employees and does not discriminate among its employees based on political views, religion or race. Employees should clearly state that their views do not reflect TEMSEA's views when expressing their political views and opinions in their personal lives.

SOCIAL MEDIA

TEMSEA respects its employees' freedom of expression and use of social media. However, sharing content on behalf of TEMSEA and about TEMSEA from personal social media accounts or similar public channels by employees, even when done with good intentions, may damage the reputation of TEMSEA and may sometimes lead to unpredictable results for the employees. In this context, employees are expected not to share posts on behalf of TEMSEA or related to TEMSEA in their social media accounts.

The employees are expected not to share anything from their social media accounts which includes discrimination, bullying or insults, can be seen as lewd or obscene, and may hurt the sensitive values of any community.

Employees are also required not to share photos or videos showing TEMSEA's working areas.

CLIMATE, ENVIRONMENT AND SUSTAINABILITY

As TEMSA, within the scope of the sustainability principle we have adopted in our activities, we organize work and events to increase awareness on these issues, pay attention in our operations as well as in our production activities to the protection of the environment and natural resources and the fight against climate change.

We are taking important steps in line with the European Green Deal, which is closely followed by the automotive industry, and our decarbonization target within this scope, while we closely follow local and international legal regulations on human rights and working conditions and responsible supply chain issues such as the German Supply Chain Law. With our work in this field, we share the pride with all our stakeholders and business partners in being deemed worthy of the “Silver” award by EcoVadis, a global-scale rating platform where sustainability performance, care for the environment, employee rights, ethical values and sustainable procurement practices of more than 55 thousand companies serving in 60 countries and more than 200 sectors are evaluated.

With the vision of being a people-oriented technology company that offers sustainable mobility solutions, we aim to have 50% of the vehicles in the city bus segment that we sell in 2025 with alternative fuel and, thanks to our increasing circular business model practices, to bring our greenhouse gas emissions to net zero by 2050.

In this context, we, as TEMSA, state that we value the protection of the environment and natural resources, compliance with sustainability policies and the fight against climate change, and we expect the people with whom we have commercial relations and our employees to show the same sensitivity.



ETHICS REPORTING PLATFORM CONTACT INFORMATION

ETHICS HOTLINE:

✉ E-mail: etik@temsa.com

📄 Web Form: ethics.sanctiontrace.com