



HYDRO TUBE

CODE OF ETHICS AND WORKING PRINCIPLES

A. OUR VALUES AND BEHAVIORS

1. Trust and Honesty

We are the most reliable solution partner for our customers; with over 45 years of deep-rooted history, we continue to be a trustworthy solution partner with unparalleled stock and supply power, producing customer-focused solutions.

Customer satisfaction; with our years of experience, we establish our place in the industry with well-deserved respect and trust by giving importance to pre-sales and post-sales customer satisfaction.

2. Speed

We respond to customer requests quickly and comprehensively. We strive to be effective and solution-oriented in all our suggestions.

3. Friendship

Considering our customers as our business partners, we establish long-term relationships by providing support with our expertise.

4. Innovative

We follow innovative thought structures; by keeping track of developments in Turkey and around the world, we aim to respond to the demands of our customers and employees with the most accurate solutions.

5. Continuity

We believe in continuity; with over 45 years of experience, we act to move the trust gained in the industry further with our customers and employees.

6. Responsibility

We bear responsibility; we are conscious of the responsibility we carry to our customers, employees, society, and business partners.



B. OUR RULES - OUR RESPONSIBILITY

Our rules represent a commitment at Hydro Tube to strive to do what is right. They serve as a valuable resource to guide employees and others in making informed and ethical decisions. Our rules reference policies, procedures, instructions, and practices within the Integrated Management System found in all companies under the Aydın Group. As behavioral rules may not cover all possible situations, you can integrate into the system by using suggestion and request boxes, reaching out via email (ik@aydingroup.net) or phone, or by contacting the Human Resources Department in person if you have any questions or concerns.

Those Who Must Adhere to Our Rules

Our rules are applicable to all Hydro Tube and Aydın Group employees, officials, Board Members, suppliers, and business partners. Our business partners, including joint ventures and third parties, can directly impact our reputation through their actions. Therefore, we prefer to work with business partners who share our commitment to safety, ethics, and compliance. We expect all our contractors and their employees to act consistently with our rules and encourage them to do so. We will take appropriate measures when we believe they do not meet our expectations or contractual obligations.

1. Employee Responsibilities

- Know and be familiar with our rules, values, and all related regulatory procedures and instructions.
- Act in accordance with our rules and remind other business partners, suppliers, and third parties of our rules while conducting their work.
- Behave in accordance with the Integrated Management System regulations, procedures, instructions, and requirements.
- Share concerns with the Human Resources Department when aware of possible rule and legal violations, using the suggestion box, email address (ik@aydingroup.net), phone, or sharing the issue in person with the Human Resources Department Manager.
- Always collaborate and be solution-oriented.



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2. Managerial Responsibilities

- Help team members understand the rules.
- Demonstrate consistent behavior towards each team member.
- Listen to and assist in addressing the team's concerns, seeking support if necessary.
- Create a respectful, collaborative, inclusive, and solution-oriented environment.
- Take care to ensure that no one is left in a difficult situation.

C. SAFE, RESPONSIBLE, AND RELIABLE WORKING

Nothing is more important to us than acting responsibly towards the health, safety, security, and common environment of our workforce and the communities in which we operate.

Our respect for humanity and work, coupled with the goal of preventing work accidents, places the factor of Occupational Health and Safety at the forefront. Taking measures to intervene in emergencies, and organizing to fulfill our responsibilities, are our top priorities.

We encourage all Aydın Boru employees, suppliers, and business partners to comply with the applicable "Health, Safety, Environment and Security" requirements.

We strive to supply high-quality products, meeting the unconditional customer satisfaction required by the global market competition.

We fully comply with national and international legal regulations. In all our activities, we progress with a human and environmentally focused approach.

Reducing the negative environmental impacts arising from our activities and taking necessary measures to prevent work accidents and occupational diseases are essential for us. We are committed to improving and implementing our Integrated Management System to be more efficient and effective by developing the awareness and responsibility of our employees.

We use our limited natural resources efficiently and effectively.

We ensure the reduction, separation for reuse, recycling, and legal disposal of waste.



We aim to set an example for all competitors and stakeholders. Considering technological developments and the demands, expectations, and needs of society, we continuously review our quality, environmental, occupational health, and safety practices with the policies we develop, showing care to work with the Integrated Management System.

D. OUR EMPLOYEES

Hydro Tube embraces the philosophy of "Growing with Investment in Human Resources," focusing on competence, performance, and high motivation.

Our Corporate Culture:

- Living together with respect for everyone and different cultures.
- Creating value together and achieving success by living our values.
- Establishing open communication in questions, concerns, and issues.
- Learning information from its primary source.
- Respecting and prioritizing the confidentiality of personal information.
- Treating everyone fairly, respectfully, and honorably.
- Conducting relationships and communications in accordance with business ethics.
- Avoiding bullying, harassment, and aggressive behaviors.

E. OUR FINANCIAL INTEGRITY AND ASSETS

With all our honesty and transparency, we safeguard the interests of our shareholders, manage our assets and values, maintain necessary records, and conduct controls consistently.

Our Principles:

- Record and retain all our financial and non-financial information legally as required, and share them transparently with authorized organizations when necessary.
- Report all transactions in accordance with procedures.
- Employees, business partners, and/or suppliers trust our information.



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- Backup and record our electronically stored data at necessary intervals, and destroy what needs to be disposed of within the framework of confidentiality.
- Obtain necessary approvals from competent authorities when preparing reports and data required by law.
- Each of our employees acts to protect our company assets, ensuring they are not damaged, misused, or lost.
- Our user identities, passwords, and passcodes are secure.
- We use computer equipment, phones, email, and internet access for business purposes, regularly taking necessary measures to protect our company against cyberattacks and malicious activities.
- Each employee protects company information, handling confidential or private information, including employee data, with careful consideration for encryption and authorized usage by relevant individuals.

F. OUR BUSINESS PARTNERS, FAIR TRADE

Since the 1970s, we have been operating in our field with honesty, respect, and responsibility towards our business partners. Our emphasis on customer satisfaction, our business discipline, and the care we take for the long-term nature of the relationships we establish have earned us a well-deserved reputation and trust in the industry. Being a symbol of respectability and reliability is our most important goal.

Our Principles:

1. Compliance with Laws

We comply with local and international regulations, laws, declarations, principles, and contracts in all countries where we operate. We do not engage in illegitimate or illegal activities. In this context, we carefully select suppliers and business partners, avoiding collaboration with parties that do not comply with laws and obligations.

2. Fight Against Corruption and Bribery

Hydro Tube operates in compliance with the legislation and ethical values of every country in which it operates, acting honestly. It is strictly prohibited for



its employees to engage in any action related to bribery, corruption, abuse, or money laundering, and zero tolerance is applied in this regard. Suppliers and business partners are also required to refrain from involvement in any actions related to bribery, corruption, abuse, or money laundering, and they must comply with all local and international laws and regulations in the fight against these actions. Otherwise, it is essential to sever the business relationship with third parties involved in bribery/corruption demands or offers. Individuals working on behalf of Hydro Tube, including employees and suppliers, as well as all our business partners, are prohibited from providing anything of value directly or indirectly to any public or private sector official in order to gain a commercial advantage, influence official business or decisions, use their positions, show favoritism, or otherwise gain personal benefits or make offers. Actions such as direct or indirect payment of tips, additional payments, gifts, donations, etc., to facilitate or expedite business are considered within the scope of prohibited actions.

3. Compliance with Competition Regulations

Hydro Tube is committed to conducting its operations in a manner that ensures free and fair competition with its competitors and safeguards consumer welfare. In markets where it holds a dominant position, Hydro Tube refrains from abusing its dominance and does not create entry barriers for potential players in the market. On the contrary, it supports the lowering of prices in accordance with the prevailing competition rules, encouraging the provision of innovative products and services that add value to consumers.

Therefore, it is strictly prohibited for suppliers and business partners to abuse their dominant positions in the markets they operate in, engage in behaviors or coordinated actions that negatively impact competition among the stakeholders of the commercial ecosystem, such as price fixing and market sharing, or enter into agreements that restrict competition in any way.

4. Confidential Information

Hydro Tube requests suppliers and business partners to respect Hydro Tube's intellectual property rights, trade secrets, and all information, including sensitive and confidential information, in order to establish a sustainable and trustworthy relationship. They are expected to take necessary security measures to protect such information if they have access to it.



Unless otherwise specified in contracts concluded with Hydro Tube or unless the information has become publicly available without any breach by third parties, suppliers and business partners are strictly prohibited from using or disclosing any of Hydro Tube's information without written permission.

Suppliers and business partners are not allowed to disclose Hydro Tube's confidential information to anyone outside their organization. Within their organization, disclosure is restricted to those who need to know the information for the performance of their duties. This section does not alter any existing confidentiality or non-disclosure agreements between suppliers, business partners, and Hydro Tube, and it does not override any rights and obligations specifically provided in such agreements.

5. Protection of Personal Data

In accordance with the Law on the Protection of Personal Data No. 6698, Hydro Tube respects the privacy of private life and protects personal data.

Suppliers and business partners are required to accept and commit to specific contractual obligations regarding the protection of personal data in contracts to be concluded with Hydro Tube.

6. Transparency and Conflict of Interests

Hydro Tube emphasizes the establishment of equal, fair, honest, and transparent relationships with suppliers and business partners within an objective framework of rules.

In all its activities, Hydro Tube prioritizes its own interests. Therefore, none of Hydro Tube's employees are allowed to act contrary to the obligation of prioritizing the best interests of Hydro Tube. They cannot engage in any economic, social, or individual relationships with suppliers and business partners that may lead to a conflict of interest.

It is strictly prohibited for suppliers, business partners, and Hydro Tube employees to exert pressure on each other or influence business-related decisions using personal relationships outside of the business relationship.

If suppliers and business partners have any familial ties (such as spouse, parents, siblings, grandparents, children, grandchildren, in-laws, etc.) or any other relationships that could create a conflict of interest with Hydro Tube employees they are working with, they are obligated to immediately report this matter to Hydro Tube Management.



7. International Trade Regulations

All suppliers and business partners working with Hydro Tube must comply with current trade, export, and import regulations.

The control of international trade is regulated to protect the national security and foreign policy interests of states implementing import and export control mechanisms. Hydro Tube respects international trade regulations of states. These regulations cover not only the import and export of products, services, software, and data but also include sanctions and anti-boycott rules.

8. Universal Human Rights and Working Conditions

Hydro Tube is dedicated to providing all employees with a fair, safe, productive, and inclusive working environment and adhering to universal human rights standards, expecting its suppliers and business partners to fulfill this commitment.

Discrimination against individuals based on conditions such as gender, age, belief, race, social class, social background, disability status, ethnic and national origin is not allowed, and individuals cannot be treated differently based on these factors. In particular, employees cannot be harassed or punished for the reasons mentioned above.

Within the framework of fair working conditions, it is important to comply with the legislation in the payment of deserved wages to employees, the remuneration of mandatory work and overtime hours. Rules preventing any form of harassment, mental or physical coercion are enforced.

It is prohibited to employ individuals below the legally defined minimum age for work in the country where the work is performed, and employing individuals under 15 years of age under any circumstances is forbidden. Hydro Tube strictly rejects all employment practices contrary to this, and no supplier or business partner with such employment practices will be collaborated with.

Employees' contractual rights are declared to employees at the time of entry into work. Within the scope of employer policy, all relevant rights of employees are observed. Hydro Tube expects suppliers and business partners to conduct their relationships with their own employees in this way.



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9. Occupational Health and Safety

Hydro Tube takes responsibility for the health, safety, and occupational safety of its workforce and the communities in which it operates.

All health and safety standards prescribed within the "Local Legislation on Occupational Health and Safety" must be met by suppliers and business partners, who are required to provide a healthy and safe working environment for their employees. Employers must communicate notifications to employees regarding occupational health and safety, encompassing all legal regulations.

Furthermore, all suppliers and business partners providing services at Hydro Tube facilities must adhere to the occupational health and safety rules adopted and implemented by Hydro Tube.

10. Acceptance and Giving of Gifts, Invitations

Professionalism in relationships with third parties, including employees, customers, suppliers, and business partners, is essential. In matters of gifts, invitations, and hospitality offers and acceptance, all third parties must adhere to business rules.

To prevent conflicts of interest arising from the acceptance of gifts and hospitality and to implement a correct, honest, and fair purchasing policy in Hydro Tube's procurement processes, rules are established regarding the offers of gifts and hospitality from suppliers and business partners. It is strictly prohibited for suppliers and business partners to provide gifts, payments, meals, entertainment, or similar elements that could affect or create the impression of affecting the decisions of Hydro Tube employees related to business.

Hydro Tube employees can accept symbolic gifts, such as plaques and symbols, provided at meetings or seminars attended on behalf of Hydro Tube, and traditional gifts such as diaries, calendars, pens, and products bearing the company logo. Suppliers and business partners are expected to adhere to this and refrain from offering gifts or similar advantages to Hydro Tube employees beyond what is mentioned above. The giving of cash or cash-like gifts is strictly prohibited.

11. Responsibility Towards the Environment

Hydro Tube places great importance on environmental protection, striving to minimize the impact of its production processes and products on the



environment. Suppliers and business partners are expected to act with this sense of responsibility.

12. Accurate Keeping of Books and Records

Keeping records and books accurately, completely, and honestly is crucial for preserving Hydro Tube's reputation and reliability, as well as fulfilling its obligations under the current regulations. All records, including but not limited to ledgers, reports, presentations, financial statements, and footnotes, that will be presented to the public, investors, and relevant authorities by Hydro Tube must be prepared accurately, completely, and transparently.

Hydro Tube expects suppliers and business partners to adhere to the same principles in maintaining their records and books.

13. Auditing and Corrective Actions

Hydro Tube requests all suppliers and business partners to understand and adhere to these Hydro Tube Code of Ethics and Working Principles.

In order to confirm compliance with the Hydro Tube Code of Ethics and Working Principles, Hydro Tube reserves the right to periodically request information and documentation from suppliers and business partners and has the right to conduct on-site inspections at any time or commission third parties to do so. Suppliers and business partners acknowledge Hydro Tube's right to request information and conduct inspections by engaging in business with Hydro Tube. During such inspections, if any non-compliance or rule violation is detected, Hydro Tube reserves the right to unilaterally terminate its business relationship with any supplier or business partner found to have violated the rules specified in the Hydro Tube Code of Ethics and Working Principles.

Hydro Tube may request an action plan from suppliers and business partners to address any non-compliance and may conduct complementary inspections to ensure the implementation of the actions outlined in the action plan.

14. Liability

The provisions and statements in the Hydro Tube Code of Ethics and Working Principles are not intended to create any contractual rights that can be claimed against Hydro Tube by suppliers and business partners. Suppliers and business partners cannot make any claims based on the Hydro Tube Code of Ethics and Working Principles.



Compliance with the Hydro Tube Code of Ethics and Working Principles is entirely the responsibility of suppliers and business partners. By engaging in a business relationship with Hydro Tube, suppliers and business partners acknowledge that Hydro Tube reserves the right to unilaterally make changes to the Code of Ethics and Working Principles from time to time and that they can access the Hydro Tube Code of Ethics and Working Principles at <https://www.hydrotube.com.tr>

Hydro Tube expects suppliers and business partners to have effective investigation and resolution mechanisms, to the extent permitted by the legislation, regarding behaviors that violate the Hydro Tube Code of Ethics and Working Principles or the applicable regulations. In the event of identifying a potential violation of these principles or current legislation, you are required to promptly notify Hydro Tube. Any questions regarding the Code of Ethics and Working Principles can be directed to ik@aydingroup.net.

**The rules set forth in the "Hydro Tube Code of Ethics and Working Principles" are expected to be adhered to by all employees, suppliers, and business partners of Hydro Tube Hydraulic Pipe Industry Inc.*

Without fear of retaliation or victimization, in accordance with the principles of confidentiality, you can contact the Human Resources Department to report any legally, policy, or ethically identified or suspected violations in good faith.

Hydro Tube Hydraulic Pipe Industry Inc. Human Resources Department

E-mail: ik@aydingroup.net

Additional Resources:

ISO Integrated Management System All Procedures and Operating Rules

ERP Program

Internal and External Audit Systems

Aydin Group Business and Operating Rules Regulation

Human Resources Procedure

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