

GALSAN



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Ethical Management and Principles for Sustainability

Together in the Future....

This document, prepared in light of Galsan's 50 years of experience and vision, will serve as a guide for all our stakeholders.

50 years in plastics



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MESSAGE FROM THE MANAGEMENT



Ali Seyhan

Chairman of the Board

Dear Colleagues,
Esteemed Stakeholders,

Since its establishment, Galsan has placed people, ethical values, and sustainable growth at the core of its operations. While improving its business processes, our company has always adopted the responsibility of protecting the planet's resources and remaining committed to its corporate values as a fundamental principle.

The position we have reached today has been made possible through the dedicated contributions of our colleagues and the trust-based collaborations we have built with our stakeholders. This strong sense of solidarity forms a fundamental pillar of our goal to carry Galsan's values into the future.

Our understanding of sustainability encompasses not only our environmental and economic performance but also our responsibility to contribute to societal well-being. In this context, we place great importance on cultivating a working culture that respects human rights, uses resources efficiently, and embraces equality and inclusiveness.

As Galsan, our objective is to establish a value chain that contributes to a fair and livable future, where economic growth progresses in harmony with social development. We have full confidence that we will achieve this goal through the collective effort of all our employees and stakeholders.

On this occasion, I would like to express my sincere appreciation for your dedication, sense of responsibility, and collaboration in implementing the Galsan Ethical Principles and advancing our sustainability commitments.

Respectfully,





GALSAN ABOUT

Founded in 1974, Galsan conducts R&D, design, and production activities on plastic parts for the automotive industry. With its international presence, extensive product range, ongoing R&D and design efforts, and state-of-the-art machinery, it serves as a parts manufacturer for globally recognized companies such as Toyota, Ford, and Mercedes.



GALSAN

Our Values

Reliable

Trust in Management, Production, and Service Approach

GALSAN bases its management, production, and service approach—both within the organization and externally—on trust, supported by its industry experience, maturity, and ethical and scientific principles. The primary sources of this trust are the company's honest, responsible, and competent employees, as well as its production and management infrastructure, processes, and systems.

Competent

Development Through Experience, Knowledge, and Technology

GALSAN continuously enhances its competencies through the knowledge it has accumulated in the sector, its extensive experience, and the investments it makes in its technological infrastructure. When the value placed on knowledge and experience is combined with a strong system management approach, a bold, self-confident, and competitive Galsan has emerged in every aspect.

Innovative

Open to new ideas and committed to creating added value.

GALSAN has strengthened its entrepreneurial spirit through the integration of R&D and innovation into its corporate culture. In order to continuously offer its customers improved products and production technologies, the company manages its organization with mechanisms that encourage collaboration, welcome new ideas, and prioritize value-creating initiatives.



Our Ethical Principles

Galsan believes that justice, a reliable legal system, and effective social policies form the foundation of sustainable development and growth. With this perspective, we define our corporate ethical framework and communicate it to all our stakeholders.

We believe that every individual can work happily and productively under appropriate working conditions and in an environment where they can realize their potential, and we design our business processes accordingly.

Galsan has established its ethical principles in a manner that reflects its trustworthy, competent, and innovative stance in its internal operations and its relationships with stakeholders. These principles emphasize respect for human rights, the careful and non-wasteful use of resources, the protection of natural resources and the environment, and the promotion of approaches based on social equality.



The “Corporate Social Responsibility Committee,” established to oversee our Corporate Social Responsibilities—particularly our Ethical Working Principles—will lead the efforts for communicating these principles, managing the compliance process, and increasing awareness day by day. The committee will also evaluate all feedback received.

Committee Members:

1. Chairman of the Committee- Galsan Executive Board.
Chairman.
2. Compliance and Business Ethics Officer: General Manager
3. Social Sustainability Officer: HR Manager
4. Environmental Sustainability Officer: Quality Manager
5. Technological Sustainability Officer: Engineering Manager
6. Sustainability Risk Monitoring Officer: System Consultant

1. RESPECT TO HUMAN RIGHTS” Our Policy and Principles

Human rights are the fundamental rights and freedoms that every individual possesses simply by being human. These rights aim to protect a person’s life, liberty, security, dignity, and well-being.

Human rights are universal; that is, they apply to everyone, are inherent from birth, are inalienable, and must be upheld without any form of discrimination.

Human rights seek to meet individuals’ physical, psychological, and social needs and guarantee the protection of human dignity.



Galsan has outlined its principles for respecting human rights as follows. Any behavior contrary to these principles is not permitted.

- We adopt the United Nations Universal Declaration of Human Rights and aim to ensure that our Ethical Principles and related policies are aligned with these values.
- As Galsan Group, we act with utmost sensitivity in fulfilling the requirements of national legislation governing working life—particularly the Labor Law No. 4857—and operate in full compliance.
- We exercise great care and diligence in treating all employees equally and fairly, and we expect the same approach from all our stakeholders.
- In all communication with our stakeholders, we use a manner consistent with our values and appropriate to our corporate identity.
- In recruitment processes, we do not discriminate on the basis of gender, language, religion, race, color, age, nationality, political opinion, or economic status; our sole criterion is suitability for the job.
- Galsan is committed to ensuring the equal and fair representation of women in the workplace, grounding its approach in the United Nations’ Sustainable Development Goal on “Gender Equality and Women’s Empowerment.”
- As a company, our commitments to women’s rights and to supporting women’s participation in professional life include: providing equal opportunities in all areas, implementing the principle of equal pay, increasing women’s representation in leadership and career pathways, supporting women in achieving work-life balance, offering training to employees to strengthen gender equality and inclusiveness awareness, and contributing to women’s empowerment in society by supporting women entrepreneurs, women-owned suppliers, and women-led social initiatives—thus reinforcing equal opportunity across the community.

1. RESPECT TO HUMAN RIGHTS” Our Policy and Principles



- We reward success through fair and competitive compensation policies, as well as an effective and objective performance evaluation system and its applications.
- We aim to strengthen employee commitment to the company by ensuring equal opportunities in appointments, promotions, rotations, and recognition.
- We provide equal opportunities for the training, guidance, and development of our employees.
- We create a working environment where cooperation and solidarity are essential, and where transparency and mutual respect are encouraged.
- We do not tolerate any form of discrimination.
- We provide our employees with clean, healthy, and safe working conditions.
- We respect our employees’ rights to unionize and engage in collective bargaining.
- We do not permit any form of violence or harassment.
- We maintain zero tolerance toward child labor, slavery, human trafficking, and forced labor.
- We use company resources responsibly.

For more detailed information, please refer to the “GALSAN Human Rights Respect Policy.

2. Compliance with Laws and Financial Accountability

- In every country in which we operate, we act in full compliance with local laws, and in cases where regulations are unclear, we proceed in accordance with our Ethical Principles and, when necessary, consult the relevant authorities.
- As Galsan, we regard intellectual and industrial property rights as essential tools for achieving sustainable competitive advantage and optimal business results. In this context, we closely follow impactful innovations, remain open to collaborations that enhance our technology and protect our product designs, and aim to generate value from our existing portfolio. Respecting the intellectual and industrial property rights of third parties is one of our fundamental principles in this area.



- We act in compliance with legal regulations when processing personal data and take all necessary precautions.
- We record all our commercial activities and documentation completely, transparently, and in accordance with applicable legislation, and we ensure they are available for audit. We make sure that agreements with third parties are compliant with legislation, our Ethical Principles, and our policies, and that they are clear and understandable.
- We recognize that non-compliance with the law may affect not only the relevant employee, department, or company, but the entire organization and all its stakeholders. We are aware that compliance is required not only with local legislation but also with international regulations. We act with the understanding that non-compliance may result in various sanctions, including administrative fines, and that individuals may also be held personally liable.

3. Anti-Bribery and Anti-Corruption

This policy aims to create an ethical and transparent business environment, ensure legal compliance, and protect the company's reputation.

Bribery: The act of offering, requesting, giving, or receiving money, gifts, or other advantages with the intention of improperly influencing a business outcome.

Corruption: Any unlawful act carried out in the public or private sector for personal or group benefit.

The fundamental principle in implementing this policy is **"Zero Tolerance."**

Regardless of national legislation, neither Galsan nor its Business Partners may permit or tolerate any form of bribery, corruption, facilitation payments, or the giving or receiving of inappropriate gifts to or from any person.



- It is strictly prohibited to provide any benefit to domestic or foreign government officials or other third parties—regardless of whether they are public officials—in order to obtain an illegitimate advantage. This prohibition includes offering, promising, providing, or accepting anything of value to influence the decisions of any third party, whether directly or indirectly related to Galsan's business activities.
- All our employees are obliged to comply with local and relevant international legislation on anti-bribery and anti-corruption, as well as with applicable Company policies. We also expect all our Business Partners to act in accordance with these regulations.
- Violations of Anti-Bribery and Anti-Corruption legislation may result in serious consequences for Galsan's managers, officers, and employees, including administrative and/or criminal penalties, revocation of permits and licenses, confiscation of assets, and, most importantly, damage to Galsan's reputation.
- A violation of this Policy by an employee may lead to significant disciplinary action, including termination of employment. In addition, if the relevant actions are found to be contrary to applicable legislation, the Corporate Social Responsibility Committee or an authorized company representative will notify the appropriate legal authorities.
- To increase employee awareness and reinforce adherence to company principles, Galsan Group regularly conducts training sessions and awareness seminars; it particularly tracks the participation and positive conduct of employees involved in administrative and decision-making processes.

For more information, please refer to the Galsan Ethical Policy Procedure.

4. Gift and Hospitality Policy

The purpose of the Gifts and Hospitality Policy is to establish the rules and standards that must be followed when receiving or giving gifts, hosting guests, accepting hospitality invitations, or engaging in similar activities while acting on behalf of Galsan.

This policy is implemented particularly to prevent bribery and conflicts of interest, maintain ethical standards in the workplace, and ensure transparency.

Gift: Any item or benefit of monetary value given or received directly or through intermediaries, including discounts, gift cards, promotional materials, offers of employment, cash or cash equivalents, credit, memberships, services, or privileges.

Hospitality: Includes meals, short- or long-term accommodation, travel and transportation, as well as social events organized for sporting, cultural, or other purposes.



In this regard, before engaging in or accepting any Gift or Hospitality activity, employees must pay attention to the following:

- The Gift or Hospitality must not influence, or create the perception that it could influence, the decision-making processes of Galsan or any third party.
- The behavior must not harm the company if it becomes publicly known.
- It must not create any conflict of interest.

Our gift and hospitality practices must comply with the following rules:

- They must be reasonable in value, infrequent, and within the limits defined in our policies and procedures.
- They must not be cash or cash equivalents.
- They must be recorded clearly and transparently in our books and records.
- They must not influence any decision-making process related to our business relationships.
- They must not pose any reputational risk to the company if made public.
- In cases of any doubt, the Corporate Social Responsibility Committee and the relevant authorized body must be consulted.

Any gift or hospitality activity that falls outside these defined conditions and priorities may be subject to review.

5.Prevention of Conflicts of Interest

A conflict of interest arises when an individual's or an organization's personal, professional, or financial interests are misaligned with, or in conflict with, the interests of others. Such situations may hinder a person's ability to make impartial and objective decisions, as personal interests can outweigh professional or ethical responsibilities.

If we find ourselves in a situation that may be considered a conflict of interest, we must immediately inform our managers, the ethics compliance advisor, or the Human Resources Manager to avoid any potential harm to ourselves or to the company.



- We refrain from using our titles or authorities to gain benefits for ourselves or for close relatives.
- We exercise due care to ensure that personal investments or family-related income or roles outside of work do not interfere with the time and attention required to perform our duties at Galsan and do not create a conflict of interest.
- Even outside of working hours, we do not engage in employment or enter into partnerships that could conflict with our loyalty to Galsan or negatively affect our individual performance.
- In cases where key decision-makers of our Business Partners or suppliers have familial or other close relationships with individuals involved in Galsan-related commercial activities, we inform our manager, the ethics compliance advisor, or the Human Resources Manager about the matter.

Being involved in situations that may lead to a conflict of interest, or failing to report identified conflicts to the authorized units, constitutes a disciplinary offense.

6. Prevention of Money Laundering, Terrorism, and WMD Financing

Money Laundering: The process of integrating illegally obtained funds into the financial system in a way that makes them appear legitimate is referred to as money laundering.

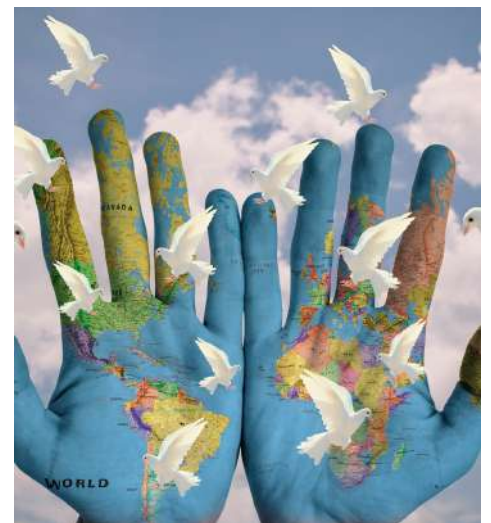
Weapons of Mass Destruction (WMD): Refers to nuclear, chemical, and biological weapons, as well as ballistic missile programs, as defined under United Nations Security Council resolutions.

Proceeds of Crime: Assets derived from criminal activity.

Financing of Terrorism: Activities that provide financial support to terrorist individuals, groups, organizations, or supporters of terrorism.

Galsan has adopted the motto ***“Peace at Home, Peace in the World”*** as one of its guiding principles. Accordingly, it is not permissible to support any action or commercial activity that could disrupt national or global peace. In selecting stakeholders, as well as in choosing business and commercial activities, ensuring non-involvement in such criminal activities will be a key consideration.

- In compliance with local and international legislation, Galsan avoids any commercial transaction that could be construed as money laundering, financing of terrorism, or financing the proliferation of weapons of mass destruction. Therefore, before entering into any business relationship with third parties, we conduct due diligence to identify and assess the counterparty.
- Galsan will not engage in business relationships with third parties about whom it lacks sufficient information, for whom negative intelligence exists, or who otherwise pose a risk or give rise to suspicion for these or similar reasons.



For more detailed information, please refer to the GALSAN Policy on Prevention of Money Laundering, Terrorism, and the Financing of Weapons of Mass Destruction.

7. Compliance with Economic Sanctions and Export Controls

States and international organizations may restrict the transfer or supply of certain goods and services, technical data, information, materials, and technologies in accordance with sanctions and export control regulations.

Economic sanctions, whether full or partial, may be applied to specific countries, organizations, or individuals for political, military, or social reasons.

Galsan operates with diligence to ensure that global and national procedures and laws are properly implemented in international trade. Expert partners are selected and necessary actions are taken to monitor and comply with current national and international regulations.



Violating this policy may result in the following consequences:

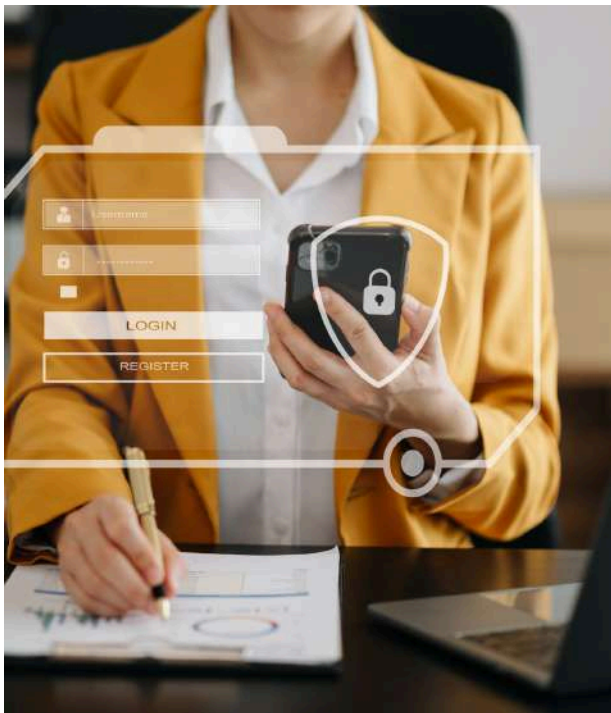
- *Imprisonment for employees (as a result of sanctions violations)*
- *Significant financial penalties for both the company and employees*
- *Loss of reputation*
- *Loss of business and termination of agreements*
- *Difficulties in accessing international financing*
- *Revocation of credit facilities*
- *Seizure of company assets*

For more detailed information, please refer to the GALSAN Policy on Compliance with Economic Sanctions and Export Controls.

8. Protection of Confidential and Proprietary Information

Confidentiality is a matter of compliance under Galsan's core value of "Trustworthiness", encompassing the protection of personal data, company-specific processes, designs, and commercial information related to the company's products and services.

In companies, the protection of confidential and private information is a policy designed to ensure that trade secrets, customer information, personal data, and other sensitive information are securely stored against unauthorized access, sharing, or disclosure. This is critical not only for legal compliance but also for safeguarding the company's sustainability and reputation.



- We expect this level of diligence from all our employees and stakeholders, and we do not hesitate to utilize our internal procedures and legal rights when necessary.
- We recognize that it is strictly prohibited to use or share personal, commercial, financial, technical, legal, or other confidential information belonging to our company, employees, or Business Partners for our own or any third party's benefit. We take all necessary measures to protect confidential information that we are exposed to in the course of our roles and responsibilities.
- We act in accordance with national and international regulations regarding the protection of personal data and take precautions to prevent the unauthorized or irrelevant disclosure of such data.

- We use the information we obtain solely for the purposes required by our job responsibilities.
- In sharing trade secrets and other confidential information, we act in accordance with relevant legislation and our contractual obligations.
- We continue to protect the confidential information we have obtained even after leaving Galsan and do not share it with any third parties.

For more detailed information, please refer to the GALSAN Confidentiality and Protection of Private Information Policy.

9. Use of Social Media Policy

The use of social media by employees in the workplace can create various risks and potential issues. Therefore, it is important to exercise caution in this regard. Risks may arise in areas such as confidentiality and information management, reputation management, business ethics, legal responsibilities, and workplace productivity.

We recognize that personal social media accounts are private spaces and we respect individual sharing preferences. At the same time, we are aware of the significant reputational risks that social media can pose to the company, alongside the potential benefits of its proper use.



At Galsan:

- When sharing content on social media, we avoid posting material that could create disagreements or uncertainties regarding corporate matters, as well as any information or photos that would violate the company's confidentiality rules.
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- We always ensure that our social media posts comply with applicable laws, Galsan's Ethical Principles, and related company policies.

For more detailed information, please refer to the GALSAN Social Media Account Usage Policy.

10. Donations, Sponsorships, and Community Engagement

A donation refers to voluntarily helping another individual, organization, or community without expecting anything in return. Donations may take various forms, including monetary assistance, material support, services, or time.

Sponsorship activities are strategic efforts in which a company supports a specific event, project, initiative, or sports team through financial or in-kind contributions in order to enhance its brand awareness and strengthen its corporate image.

- We conduct donation and sponsorship processes in a transparent manner and ensure that these activities do not conflict with Galsan's values or commercial interests.
- We do not make donations to, or sponsor, any activities that violate human or animal rights, promote tobacco, alcohol, or drugs, or have the potential to harm nature.
- We do not donate to, or sponsor the activities of, organizations that discriminate on the basis of gender, language, religion, race, color, age, nationality, or differences in opinion.



- We do not make donations to political parties, politicians, or political candidates. However, we respect and do not restrict our employees' voluntary participation in lawful political activities.
- Company resources (such as vehicles, computers, email systems, etc.) may not be used for political activities or for personal donations made for such purposes.
- Demonstrations, propaganda, or similar activities carried out for political purposes are not permitted within company work areas.

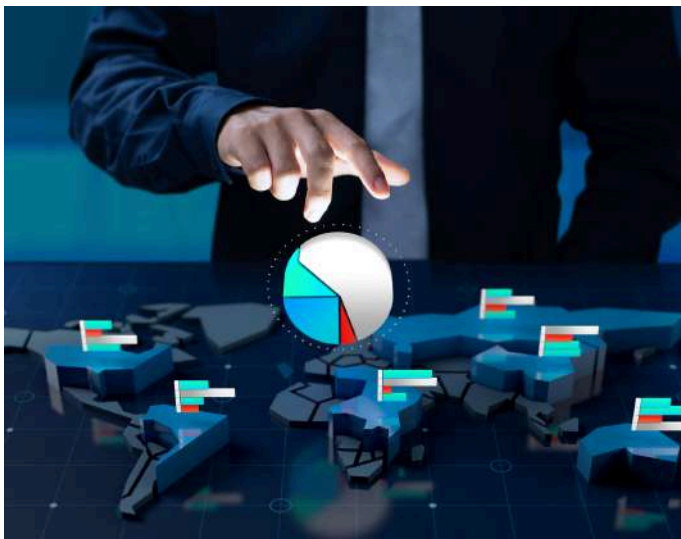
For detailed information, please review GALSAN's Donation and Sponsorship Policy and Social Activities Policy.

11. Compliance with Competition and Antitrust Laws

Competition refers to the race that enables enterprises in goods and services markets to make independent economic decisions freely.

Anti-Competitive Agreement refers to explicit or implicit understandings—whether written or verbal—between enterprises that may involve price fixing, determining production quantities, or allocating markets and customers.

To ensure fair competition with our competitors, Galsan strictly adheres to its Ethical Principles.



- Compliance with Competition Law Regulations
- Refraining from entering into any agreements or engaging in any conduct—either directly or indirectly—with competitors or other individuals or organizations that aim to prevent, distort, or restrict competition, or that may have such an effect, beyond the limits permitted by applicable legislation.

- Competitor-related information must be obtained solely through methods permitted by applicable legislation and case law, and all relevant documents must be used with proper source attribution.
- During meetings and events attended on behalf of the company—such as those held by associations, chambers, professional unions, councils, as well as conferences, fairs, or other professional or private gatherings where competitors are present—any discussions or communications that may lead to, or be perceived as, anti-competitive behavior must be strictly avoided.

For detailed information, please review GALSAN's Policy on Compliance with Competition and Antitrust Law..

12.Environment, Occupational Health and Safety

Creating a Healthy and Safe Workplace

Establishing a healthy and safe workplace means providing an environment that protects employees' physical and psychological well-being.

In this context, Galsan has implemented comprehensive health and safety practices. These practices aim to support employees in working within a secure and healthy environment, fostering their happiness and well-being. At the same time, they help prevent potential occupational accidents and health issues.



Safe and Healthy Operations at Galsan

- We carry out our operations in a healthy and safe manner without putting our employees, contractors, or society at risk. To achieve this, we utilize facilities designed with safety in mind.
- We work with competent professionals and prioritize safety throughout our processes.
- At Galsan, human life is paramount. No task is so important that it can be performed without proper health and safety precautions.
- Our employees act in full compliance with all legal regulations and company policies related to Occupational Health and Safety, and promptly report any unsafe working conditions through our communication channels.

Incident Reporting and Emergency Preparedness

- We immediately report any accidents, injuries, or unhealthy conditions.
- We identify potential emergency scenarios and make appropriate preparations; we know what actions to take in case of an emergency.
- We do not come to work under the influence of alcohol or any substance with narcotic effects

For detailed information, please review GALSAN's Environment, Occupational Health and Safety Policy.

13.Integrity in Stakeholder Relations

The term stakeholder refers to individuals, groups, or organizations that are directly or indirectly affected by an organization's activities, or that influence those activities.

Stakeholders may be impacted by the organization's successes or failures, and are therefore typically considered in its strategic planning and decision-making processes.



- We make decisions regarding the selection of suppliers and partners based on objective criteria, and we strive to work with parties that respect human rights, uphold anti-bribery and anti-corruption principles, and fulfill their legal obligations.
- We maintain open communication channels with our stakeholders and always take their complaints and suggestions into consideration.
- During visits and audits conducted with our stakeholders, we strictly adhere to confidentiality rules.
- We expect all our stakeholders to comply fully with applicable laws and regulations at all times.

- We do not make statements in press releases that conflict with Galsan's ethical values.
- We protect the legally defined rights and interests of our shareholders. We make every effort to create value in return for the resources they provide, and we distribute profits to shareholders or reinvest them in accordance with laws and regulations.
- By targeting sustainable growth and profitability, we manage our companies' resources, assets, and working time with a strong awareness of efficiency.
- İstersen bu metni bir kurumsal etik politikası, sürdürülebilirlik raporu veya yatırımcı sunumu için görsel ve içerik önerileriyle destekleyebilirim. Hangi formatta kullanmayı planlıyorsan birlikte şekillendirebiliriz.

For detailed information, please review GALSAN's Integrity in Stakeholder Relations Policy.

14. Compliance in Supply Chain Management

Commitment to Corporate Social Responsibility in Stakeholder Collaboration

As part of its sustainability efforts, Galsan is committed to working collaboratively with all stakeholders in line with Corporate Social Responsibility (CSR) principles.

In this context, we expect our stakeholders to commit to operating within the same ethical framework.

To work with us—whether as a supplier, customer, or project partner—compliance with our CSR principles is a prerequisite, in addition to meeting technical and commercial requirements. Our CSR-related criteria, which are part of our supplier evaluation process, are documented through pre-engagement and ongoing assessments. Continuation of business activities is subject to the decision of the process owner or the Corporate Social Responsibility Committee.



- Galsan expects its current and prospective suppliers to review the “Galsan Supply Chain Management Principles” document and provide reporting aligned with the outlined criteria.
- These reports are evaluated by the Supply Chain Management team, which may request further actions within the philosophy of continuous improvement, including updates and progress reports. Compliance with this process constitutes a significant part of our supplier selection criteria.
- In this context, we continue our efforts with the belief that “sustainable business relationships, efficient operations, and the advancement of our industry—both nationally and globally—can only be achieved through collective collaboration.”

For detailed information, please review GALSAN’s Supply Chain Compliance Policy.

15. Reporting Concerns

Raising Concerns in Corporate Social Responsibility Policies

Encouraging the expression of concerns within corporate social responsibility (CSR) policies helps organizations operate more effectively, ethically, and sustainably.

This practice is critically important for ensuring the long-term success and satisfaction of both the company and its stakeholders.

Whistleblowing refers to the process by which employees report illegal, unethical, or harmful practices occurring within a company or institution to authorized bodies.

Galsan has implemented protective measures to safeguard all stakeholders who raise ethical concerns or submit reports, ensuring they are not subject to retaliation.



- Galsan places great importance on integrity and accountability in all its operations.
- To ensure the effective management of the company's reporting mechanisms, individuals who witness or suspect any misconduct or unethical behavior are expected and encouraged to raise their concerns.
- Managers are also required to forward all reported cases of misconduct to the designated whistleblowing address.

Reportable Issues

Concerns may include, but are not limited to, the following:

- Crimes such as theft and fraud
- Any form of discrimination (based on race, religion, language, color, gender, age, etc.)
- Violations of ethical principles, laws, moral standards, and legal regulations
- Threats to public safety or health
- Misuse of company equipment
- Irregularities in accounting records
- Giving or receiving bribes
- Disclosure of community secrets
- Money laundering
- Environmental damage
- Harassment
- Workplace bullying (mobbing)

You may report concerns via the whistleblowing hotline at **+90 545 488 3900** or by email at **etik@galsan.com**

For detailed information, please review GALSAN's EXPRESSING CONCERNS (WHISTLEBLOWING AND RETALIATION) OUR POLICIES AND PRINCIPLES.



GALSAN

Thank you for your interest and cooperation.

Publication Date	01.03.2025
Revision Date	

50 years in plastics

GALSAN

Together in the Future

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