

OUR ETHICAL CODE AND PROFESSIONAL POLICY;

The purpose of this policy is to provide guidance for its employees and all stakeholders, reflecting the principles ZECA BANK® has adopted regarding human rights.

This policy has been prepared based on the Universal Declaration of Human Rights, the United Nations (UN) Global Compact, the UN Convention on the Rights of the Child, Fundamental ILO Conventions, the OECD Guiding Principles for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and national laws.

It is aligned with our Ethics Policies, which include ethical principles and standards of conduct in business life applicable to employees and all business partners within ZECA BANK® and all its affiliated working groups.

This policy applies to all institutions and organizations with which ZECA BANK® has business relationships, including all stakeholders, solution partners, and independent third-party organizations. ZECA BANK® encourages its business partners to implement the principles set forth in this policy and adopt similar policies.

ZECA BANK® Senior Management is responsible for the implementation of this policy. ZECA BANK® Board of Directors is responsible for the determination and oversight of the notification, investigation and sanction mechanisms in case of non-compliance with the rules and regulations in the Human Rights Policy.

ZECA BANK® conducts its operations respecting human rights in all its processes. ZECA BANK® strives to provide a work environment that complies with international standards and respects human rights, where all employees, whether team members or individuals, can develop themselves, express their opinions freely, and are free from discrimination.

Based on mutual respect in all its relationships, ZECA BANK® strives to act in accordance with human rights in its relationships with its employees, project managers, project owners, solution partners, competitors, and the communities in which it operates, encouraging them to be sensitive to these issues and preventing human rights violations.

We provide a work environment where employees, regardless of their differences, feel fully included and respect each other's rights and dignity in all their actions. In this system, where contribution to performance and corporate success is recognized, cultural diversity and equal opportunity are encouraged. Diversity in the workforce is essential for the company to achieve its goals. Therefore, ZECA BANK® strives to attract, develop, and retain talent with diverse backgrounds and experiences, who respect differences, are open-minded, and tolerant.

Everyone working at ZECA BANK® enjoys equal rights and freedoms recognized by law. In line with the ZECA BANK® Ethics Policy, there is no discrimination based on age, gender, race, color, language, religion, philosophical and political views, ethnic origin, economic status, sexual orientation, health status, disability, appearance, dress code, or lifestyle. Discriminatory behavior, actions, or retaliation of any kind is not tolerated.

ZECA BANK® respects employees' right to collective bargaining and freedom of association.

ZECA BANK® prioritizes preventing any situation that would impede employees' right to freedom of expression in the workplace and provides employees with the necessary tools and environments for them to express themselves freely. Protecting the health and safety of employees and any visitors or business partners who, for any reason, visit ZECA BANK® workplaces and/or work areas is among ZECA BANK®'s top priorities. Therefore, company management strives to maintain the highest safety standards to prevent potential hazards in the workplace. To ensure a safe and healthy workplace, it is essential to comply with the current Occupational Safety Directive and internal requirements for Office Workspaces. ZECA BANK® works to ensure and maintain a healthy and productive workplace by regularly identifying and addressing risks that could lead to accidents, injuries, and health problems through its Occupational Health and Safety Committee.

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ZECA BANK® Employees are not permitted to be employed against their will. No employee is subjected to any form of pressure, and all employees are employed in suitable positions with their consent and under equal conditions.

ZECA BANK® also adheres to the principle of child labor, as set forth in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. Child labor is not employed.

ZECA BANK® is committed to providing a safe working environment for all employees, treating them with respect and in a manner that does not undermine human dignity. Employees are also obligated not to engage in physical or psychological violence or mistreatment against anyone, regardless of the cause, and not to tolerate such behavior by others. Even if not acted upon, threats of violence or mistreatment, or attempts to instill fear are considered within the same scope. At ZECA BANK®, any form of physical, verbal, sexual, or psychological harassment, abuse, or threats are not tolerated.

ZECA BANK® conducts its operations in compliance with applicable laws regarding wages, working hours, overtime, and fringe benefits. By working to increase employee productivity during working hours, we aim to prevent overtime and support the maintenance of a work-life balance. ZECA BANK® fosters a productive and motivating work environment that continuously fosters workplace development, provides personal development opportunities, invests in training, and promotes recognition and reward programs that foster success, exemplary behavior, innovation, and creativity.

