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Code of Conducts

Living our Dreams, Purpose and Values

March 2024

Message from our Chairman of the Board....



Dear Esteemed Colleagues,

In an era where expectations evolve rapidly, the role each of us plays in genuinely making a difference through collaboration and teamwork is of paramount importance. Understanding the objectives of our firm and working in alignment with these goals is a shared responsibility that rests on all our shoulders.

Ethical conduct begins with treating all members of our extensive family, which includes our employees, stakeholders, suppliers, and customers, with fairness and respect. This foundation of trust, from our interactions with each other and our clients to our environmental practices and social engagements, underscores everything we do.

Our Code of Conduct, within the framework of professional standards, laws, and regulations, reinforces the significance of our way of working. It serves as the bedrock of the trust placed in us by our customers, the communities we serve, and our employees, guiding all our actions.

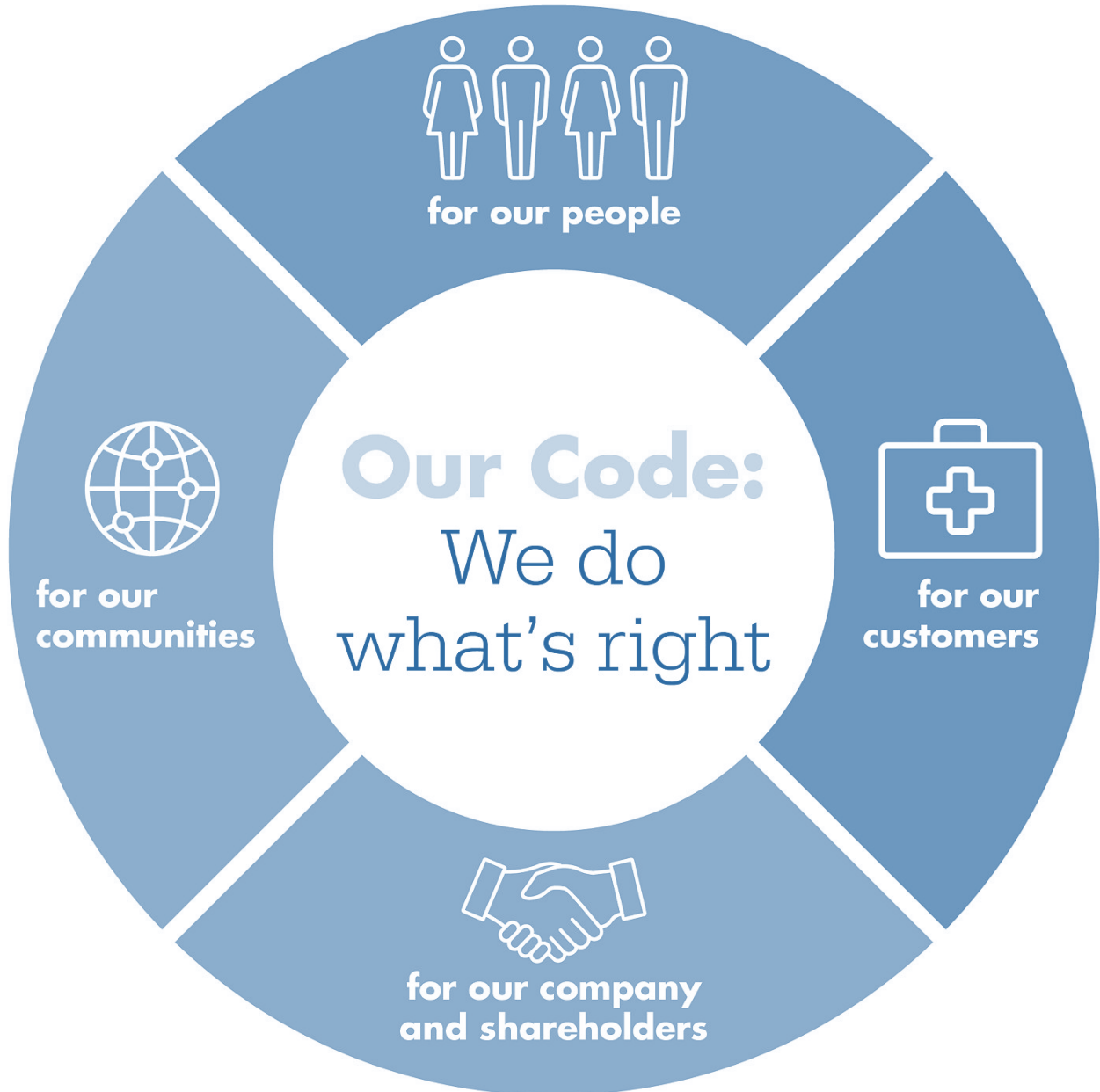
Our guidelines delineate the core values and behaviors that define us and hold us accountable to always strive for excellence. Adhering to the ethical principles outlined in our rules is the only way to ensure our company's success, sustainability, and resilience.

Our success is directly linked to our commitment to centering the company's purpose and values in everything we do, every day, in every action. Therefore, let us collaborate and work together to build trust and solve significant challenges. Let's foster cooperation and innovation, act with integrity, and always care and show diligence.

Thank you.

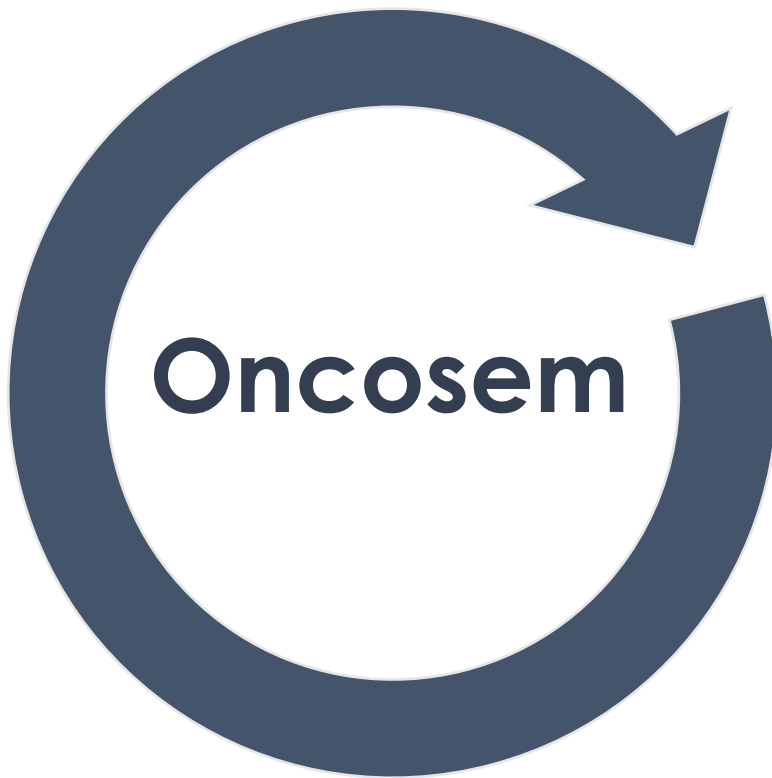
Erol Çelik

Chairman of the Board



Our Code of Conduct specifies what is expected of us. It summarizes our core principles of honesty, impartiality, professional competence and due care, confidentiality, and our professional behaviors. Our rules illustrate how these principles should be translated into action and hold us accountable to always doing our utmost.

The Code of Conduct is designed to ensure compliance with all rules, their adoption, and active implementation.



- **COMPLY**

with national and international laws and regulations

- **PROTECT**

confidential and personal information, the integrity and assets of the company

- **CONTRIBUTE**

to sustainable development, health and safety

- **RESPECT**

human rights and equal opportunities

- **AVOID**

conflicts of interest, improper payments and corruption

“Adhering to the ethical values set forth in these guidelines is the sole pathway to ensuring our company's success, sustainability, and resilience in overcoming challenges.”

It is incumbent upon each of us to implement the Oncosem Code of Conduct.

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"Oncosem employees are obligated to comply with the Code of Conduct, and failure to do so may result in disciplinary actions up to and including termination of employment."

1. Purpose of the Code of Conduct

- Oncosem has established this Code of Conduct in recognition of the importance of maintaining high social, ethical, and environmental standards and corporate responsibility toward achieving sustainable goals.
- Our priority is to ensure that our work and production provide maximum benefit to our partners, customers, and patients.
- As a provider in the healthcare sector of production, sales, and service, this set of rules has been prepared to ensure compliance and adoption of the Code of Conduct by our partners, affiliates, suppliers, and employees.

2. About Our Rules

2.1 What is the Oncosem Code of Conduct?

The Code of Conduct outlines certain norms and standards expected to be followed by individuals and communities in their interactions with each other and their surroundings. These rules are determined in alignment with the values, expectations, and ethical principles of the society, institution, or groups they serve. They encourage individuals to act fairly, respectfully, and ethically, fostering a positive interaction environment.

The Code of Conduct covers areas such as Respect, Honesty, Responsibility, Justice, Tolerance, Cooperation, Confidentiality, and Respect for the Environment.

The Code of Conduct is created to maintain societal order, strengthen relationships among people, and ensure a more just and peaceful coexistence. These rules are vital for aligning with the culture of the community or institution.

The Code of Conduct is a testament to Oncosem's commitment to conducting its business globally and adhering to the highest standards of business ethics. The rules are designed to guide employees in identifying and resolving potential ethical and compliance issues they may encounter in their daily activities. It contains general information and applicable advice on what is expected from Oncosem employees both in the workplace and beyond.

This Code of Conduct may not cover all potential situations that Oncosem employees might face. Employees with any concerns or questions regarding ethics and compliance should contact their Managers.

2.2 Who Does This Code of Conduct Cover?

The Code of Conduct applies to all employees of Oncosem and its affiliates worldwide, including their Boards of Directors, business partners, subcontractors, consultants, agents, and their employees. Oncosem requires all parties involved in its operations to adhere to the Code of Conduct.

2.3 What is Expected of Us?

- It is our responsibility to read, understand, and keep our knowledge of the company's policies and procedures up to date.
- In our daily work, we must adhere to the standards set out in the Code of Conduct, never compromising our commitment to honesty.

- If we have any questions or doubts about how to act in accordance with the rules, we must seek guidance and training.
- We should share what we learn and our best practices with others.
- We need to be vigilant about the actions of employees and third parties who do not comply with our Code of Conduct.
- If we believe the Code of Conduct has been violated, we must speak up and express our concerns to our Managers.
- We must collaborate transparently in all matters and assessments related to compliance with our Code of Conduct.

In addition to complying with the Code of Conduct, expectations include:

- Knowing, understanding, and applying the laws and regulations that affect job responsibilities,
- Always representing Oncosem in the best way possible, in accordance with its values and missions,
- Knowing, understanding, and applying Oncosem's policies and procedures related to Environment, Safety and Health, Quality, and Sustainability,
- Understanding the risks associated with their duties and how to manage them, seeking advice from the appropriate unit or individuals if unsure,
- Ensuring that all third parties and individuals they work with are aware that they must act in accordance with these rules,
- Sharing any suspicions of rule violations with Managers,
- Cooperating in the investigation of potential rule violations.

2.4 What is Expected of Oncosem Leaders?

Leaders are responsible for fostering an ethical and compliance culture where people are treated with respect within a positive working environment.

- Leaders are responsible for implementing the company's Sustainability, Ethics and Compliance, Environmental Safety and Health, and Quality principles and processes.
- Our leaders are expected to foster adherence to our Code of Conduct within the organization.
- Our leaders should train their teams on the Code of Conduct and assist in identifying solutions consistent with the standards set out in the rules when questions or problems arise.
- Our leaders must set an example and contribute to establishing a culture where employees understand that nothing justifies compromising our commitment to the Code of Conduct in the workplace.

- Aside from helping employees and others (business partners, subcontractor employees, etc.) understand the standards in the rules, principles, and practices, emphasize the importance of participating in relevant training and certifications.
- Ensure that their employees allocate the necessary time to immediately complete assigned Ethics and Compliance training.
- Inform new hires about the Rules and where to seek advice and support.
- When aware of or suspecting wrongful conduct, never ignore or overlook it; follow up, report the situation to the relevant units when necessary, and take appropriate actions.
- Never retaliate or allow retaliation against those who assist in the investigation or report concerns in good faith.
- If a potential Rule violation is reported to them, ensure the issue is reported to the relevant unit, maintain confidentiality regarding the matter reported against other employees, and not personally undertake the investigation of the matter.
- Ensure fair and respectful working conditions and job distribution in their teams, not exploiting employees for personal tasks.

2.5 How to Be an Ethical Leader?

- Regularly discuss our Company's Code of Conduct,
- Ensure your team has the knowledge and resources needed to fulfill their duties,
- Always act honestly and with integrity, building a trustworthy relationship with your team and stakeholders,
- Be just and equitable. Treat your entire team fairly and provide equal opportunities,
- Do not compromise our ethical values for business outcomes and do not allow others to do so,
- Try to understand your team's feelings and needs. Be empathetic and human-centered,
- Communicate openly and clearly. Discuss issues openly with your team and value their opinions.
- Take responsibility for the outcomes of your decisions and actions. Acknowledge mistakes and take corrective measures when necessary.
- Behave in accordance with company rules. Show respect for the rules and encourage your team to do the same.
- Continuously improve yourself. Participate in training to enhance your ethical leadership and management skills.
- Support the personal and professional development of your team. Provide opportunities that help them achieve their career goals.
- Consider your company's environmental and social responsibilities. Support sustainability and social benefit-focused projects.

- Always remember that you must set an example, reflect ethical values in your behavior, and inspire your team.
- In case of rule violations, report issues appropriately and ensure they are addressed.
- Exhibit ethical behavior in hiring, promoting, and evaluating employees.
- Actively seek diverse perspectives.
- Listen to your team's viewpoints with courtesy and respect.
- Never retaliate against any team member or allow retaliation.

2.6 What are the Expectations from Our Business Partners?

Suppliers, subcontractors, consultants, representatives, and other third parties (stakeholders) are expected to act in accordance with Oncosem's Code of Conduct and Supplier Code of Conduct as specified.

2.7 What Happens If the Rules Are Not Followed?

Our Code of Conduct is fundamental and non-negotiable. Non-compliance may lead to disciplinary action, up to and including dismissal or termination of the contractual relationship.

Individuals who authorize or instruct others to perform actions contrary to the rules, as well as those who are aware of a potential violation but fail to report it or retaliate against employees who do report, may also face disciplinary measures.

2.1 How Do We Do the Right Thing?

Everyone deserves to work in a supportive, inclusive, and safe environment and to be treated with dignity and respect.

Respecting our surroundings is a key factor in our success. When we know our ideas and talents are recognized and respected, and we feel safe, we are motivated to do our best. Therefore, we do not tolerate discrimination, harassment, retaliation, bullying, or violent behavior in the workplace under any circumstances.

- Treat each other with dignity and respect,
- Be fair,
- Comply with national and international laws,
- If you witness someone being subjected to harassment, discrimination, retaliation, or violent behavior, immediately inform your manager,
- Ensure safe and fair working conditions, hours, and wages,
- Conduct business with third parties fairly and honestly, and avoid potential conflicts of interest when selecting or working with third parties,
- Treat Oncosem assets as if they were your own, and do not allow Oncosem assets to be damaged, misused, wasted, lost, or improperly taken outside the company. Inform your manager if this occurs,

- Do not allow unauthorized persons (including friends and family) to use our company assets,
- Adhere to generally accepted accounting principles, internal controls, policies, and relevant laws and regulations,
- If you come across any misinformation about our company or products, report it to your manager,
- Comply with the Oncosem Code of Conduct and report any non-compliance to your manager.

2.2 What Should You Do If You Suspect a Violation of the Code of Conduct?

As Oncosem employees, we are expected to report any good faith belief of a violation of the Code of Conduct. By reporting our compliance concerns, we act in accordance with our Code of Conduct, helping to protect our work and reputation.

If you have any concerns about compliance, the best thing to do is to discuss the matter face-to-face with your manager.

Reporting a suspected Rule violation is not easy. Therefore, we should be able to express our concerns comfortably without fear of retaliation. Remember, failing to speak up can make it more challenging to investigate and address your concerns.

Oncosem managers are also expected to emphasize the importance of promptly reporting potential compliance issues and to encourage an open reporting environment. Oncosem does not tolerate retaliation against any employee who raises a compliance issue in good faith.

Any Oncosem employee who retaliates will be subject to disciplinary actions, up to and including termination of employment. If you believe you have been retaliated against, contact your manager.

3. Oncosem Code of Conduct

3.1 Sustainability

"The principles in our Code of Conduct are the most crucial pathway to building a sustainable company for the future."



Oncosem is committed to conducting its operations ethically, with social and environmental responsibility, alongside sound financial decisions and good governance. The principles in our Code of Conduct are fundamental to building a sustainable company for the future.

Climate change and the transition to a low-carbon economy have significant impacts on the value chains of most productive sectors and require substantial investments. However, advancements in energy efficiency, renewable energy, efficient mobility, and the circular economy represent new opportunities for everyone.

Sustainability has emerged as a guiding principle for long-term global development, aiming for a balanced approach to economic growth, social development, and environmental protection.

Oncosem considers sustainability one of its core values, making business decisions with both current and future generations in mind.

Oncosem commits to adhering to the following principles, along with all its employees:

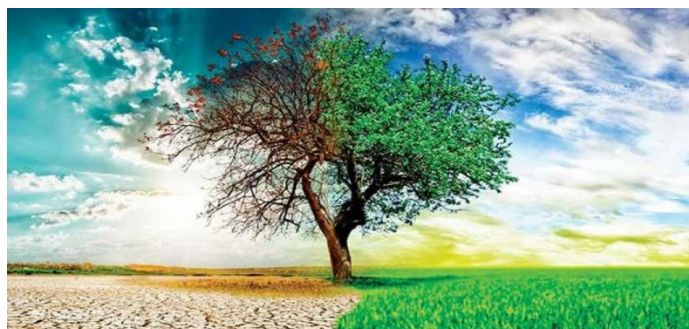
- Promoting social responsibility and ethical business practices.
- Supporting local economies and encouraging sustainable business models.
- Efficiently using and managing natural resources.
- Reducing the carbon footprint and improving energy efficiency.
- Protecting biodiversity and valuing ecosystem services.
- Supporting fair labor practices and respecting human rights.
- Encouraging community involvement and preserving local cultures.
- Making decisions in line with ethical principles and integrating these principles into the business culture.
- Acting in accordance with the principle of transparency and accountability.
- Encouraging the development and utilization of sustainable technologies.
- Finding solutions to environmental and social issues through innovation.
- Implementing waste management and recycling systems.
- Minimizing environmental impacts throughout the life cycle of products and services. Demonstrating respect for human rights in business practices.
- Monitoring and preventing negative impacts within the supply chain.
- Creating education and awareness on sustainability issues.

- Informing employees about sustainability matters.
- Promoting global collaboration and partnerships for sustainability goals.
- Complying with international standards and agreements.
- Allocating resources for research and development for every new project,
- Enabling the use and development of innovative technologies that contribute to sustainable development,
- Taking improvement actions to reduce negatives by measuring and evaluating the economic, environmental, and social impacts of all activities,
- Being transparent, complying with basic business ethics rules, and combating corruption,
- Integrating the risk management process with a holistic approach into all business processes,
- Prioritizing customer satisfaction and ensuring uninterrupted access to services,
- Producing quality and focusing on customer satisfaction,

When sustainability principles are embraced by businesses, communities, and individuals, a more sustainable world can be created. Applying these principles across various sectors can achieve a stronger balance environmentally, economically, and socially.

3.2 Environmental Responsibility

"We work with the awareness that protecting future generations will be through sustainable economic activities and the conservation of natural resources."



Environmental responsibility, including energy saving, water conservation, and world-class production, is an integral part. We operate with the consciousness that the protection of current and future generations will be achieved through sustainable economic activities and the preservation of natural resources. Complying with all environmental regulations, respecting the environment, and carefully using our limited resources are among our most critical responsibilities, ensuring our corporate success based on sustainability.

As Oncosem, we take responsibility for a sustainable future and continue to lead eco-friendly practices in the healthcare sector.

Oncosem commits to adhering to the following principles, along with all its employees:

- To follow all legal regulations related to the environment, engage in sustainability programs developed on national/international platforms, and integrate applicable areas, including the ISO 14001 Environmental Management System, into our processes; fulfilling our obligations under legal regulations and programs we are a part of,
- To respect the environment; to adopt and promote environmental sensitivity,
- To comply with the environmental legislation of the countries we operate in, the obligations arising from this legislation, and the conditions of customers, suppliers, and other third parties which we have agreed to comply with, and to ensure this compliance,
- To control the direct environmental impacts arising from our operations, ensure the efficient use of natural resources, and continuously improve towards minimizing adverse effects on the environment,
- To engage in training and internal communication activities to raise the awareness of our employees and contribute to their development,
- To foster multi-directional communication, understanding the needs of all our stakeholders, and contribute to their awareness and development,
- To plan our activities with an approach focused on preventing environmental pollution,
- To manage investments with an evaluation of environmental impacts, directing investments in an environmentally sensitive manner.

- Utilize energy-efficient and environmentally friendly technologies in all our activities to mitigate the impacts of climate change,
- In all our activities, evaluate all environmental risks and opportunities, take the necessary actions to achieve goals and objectives aimed at environmental improvements, and periodically review these,
- Monitor the environmental performance related to all our operational areas, continually seek improvement, and periodically report on the progress made,

- Provide the necessary resources by senior management for the implementation of activities under the Environmental Policy,
- Ensure the compliance of all activities with this policy is regularly reviewed by senior management.

3.3 Diversity

"We value different perspectives, thoughts, experiences, and backgrounds."



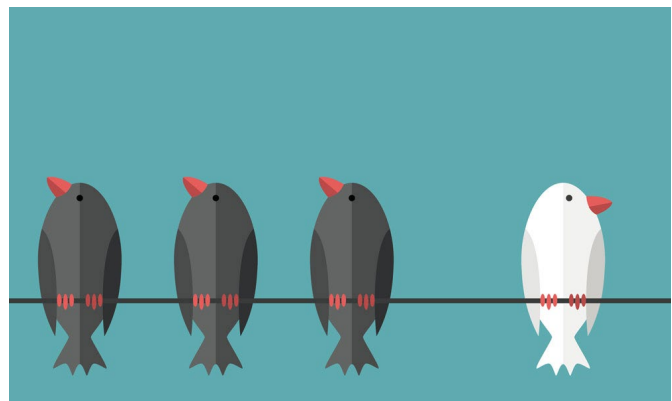
In an environment where diversity is a core value, our hiring, employment, and business decisions are never and will never be based on age, ethnicity, nationality, gender, sexual identity, physical abilities, mental capabilities, religion, worldview, sexual orientation, or social background. Our employment practices always provide equal opportunities to everyone. Efforts are made to create a respectful and equal working environment, ensuring all our employees can work comfortably, productively, peacefully, and healthily.

Oncosem has established its principles by reflecting its commitment to respecting human rights and diversity, supporting an ethical and sustainable business model, and basing it on corporate values.

- Granting equal rights and opportunities to all employees,
- Adopting a zero-tolerance policy against discrimination,
- Acting fairly and impartially in recruitment processes,
- Creating a workplace culture that promotes diversity,
- Providing training to employees on combating discrimination,
- Organizing programs that highlight awareness and cultural diversity,
- Giving equal importance to health and safety matters for all employees,
- Providing safe working conditions suitable for various needs and abilities,
- Aligning working conditions, production processes, and the supply chain with human rights standards,
- Establishing and adhering to a human rights respect policy,
- Strengthening the commitment to employees with diverse talents, cultures, genders, and backgrounds,
- Adopting a clear policy against harassment and bullying,
- Creating effective processes for handling complaints and reports,
- Encouraging participation in community projects and developing social responsibility projects,
- Providing support to various communities and groups.

3.4 Combating Discrimination and Ensuring Equality

"Everyone is equal before the law without discrimination based on language, race, color, gender, political thought, philosophical belief, religion, sect, or similar reasons."

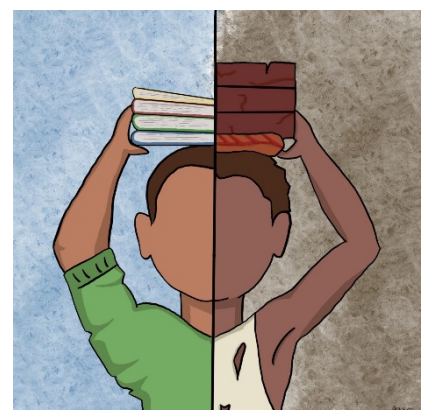


The fundamental principles Oncosem follows to prevent discrimination and ensure a fair working environment are as follows. All employees, by embracing and implementing these principles, will support the company's culture of diversity and fairness.

- The company remains committed to the principle of equality and fair recruitment practices in all hiring processes. It ensures candidates are not discriminated against based on gender, age, race, ethnicity, religion, sexual orientation, disability status, or other personal characteristics.
- The company does not discriminate, nor allows discrimination, in matters of hiring, compensation, access to training, promotion, dismissal, or retirement based on gender, age, disability, national origin, race, marital status, sexual orientation, political thought, religion, or any other status (but not limited to these), unless stipulated by local legislation.
- The company promotes diversity and supports the presence of employees from different cultural, social, and demographic backgrounds. Diversity enhances innovation and creativity.
- Discrimination or discriminatory behavior among employees is unacceptable.
- The company strictly rejects and does not tolerate any forms of violence, harassment, or other maltreatment. Physical, verbal, sexual, or emotional harassment among employees is not acceptable.
- The company encourages a culture of open communication and collaboration. It allows all employees to express their ideas and contribute, also ensuring respectful and supportive communication with other employees.
- The company provides its employees with training and awareness programs related to discrimination. These trainings raise awareness among employees about recognizing, preventing, and reporting discrimination.
- The company applies necessary sanctions against employees who violate anti-discrimination policies.

3.5 Child Labor

"Resolute in combating child labor, we illuminate the hopes of the future. The advancement of a society begins with the care for the safety and education of children."



Child labor often refers to work that deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development.

Oncosem commits to adhering to the following principles, along with all its employees:

- Child labor will not be employed.
- Operations will be conducted in full compliance with national and international laws prohibiting child labor.
- Regions and suppliers in the company's supply chain that carry the risk of child labor will be regularly reviewed and assessed.
- If underage workers are found to be employed, it will be expected that the relevant suppliers stop the practice and make improvements.
- Suppliers, even if not currently employing known children, must document and communicate their policies against employing underage children.
- Educational programs regarding child labor will be organized among employees, suppliers, and other stakeholders to raise awareness.
- Child labor risks in the regions where the company operates will be identified, and regular risk assessments will be conducted to take measures against these risks.
- Children must not be exploited, their education should not be hindered, and their health and safety must be protected.

3.6 **Forced Labor**



Forced labor and compulsory work are labors performed without the consent of the individual, under material or moral pressure. Work and employment should be undertaken voluntarily.

Oncosem categorically rejects any form of forced labor under any circumstances and respects the human rights of its employees. Practices such as forced labor, slavery, and human trafficking are strictly prohibited and any situation that contradicts company policies or local legal regulations is seriously addressed.

- The company respects and protects fundamental human rights and labor rights.
- Under no circumstances is debt bondage or involuntary labor permitted.
- Violations such as forced labor, torture, slavery, and human trafficking are utterly unacceptable.
- The company promotes fair labor practices and ensures that employees are hired based on their free will. No employee should be coerced into employment or forced to work.
- The company is honest and transparent with its employees and clearly communicates all conditions during the recruitment process. Employees are provided with realistic and accurate information regarding their jobs and working conditions.
- The company ensures that employees can continue their employment of their own free will. No employee can be forced to work through threat, coercion, blackmail, or any other form of mistreatment.
- The company offers training and awareness programs on forced labor to all employees. These trainings help employees understand their rights and the company's policies.
- The company commits to adhering to these principles and does not allow any practices among employees that support or encourage forced labor.

3.7 Prevention and Support Against Harassment

"The defining element of harassment is not the intent but the effect it has on the other person."



Any visual, verbal, and physical behavior that demeans or humiliates a person or group based on race, ethnicity, religion, sexual preference, gender, and personal characteristics, whether it involves the use of power or not, falls under the definition of harassment. It includes sexual content, uncomfortable words, attitudes, and behaviors that are not consensual.

Harassment also encompasses actions within the company by some coworkers that affect an individual's productivity, dignity, and honor in a negative manner. This type of harassment can manifest as isolating someone within the company, excluding them from projects and work activities, or hindering their communication and other personal rights.

Our culture is based on principles of mutual respect and collaboration. Sexual harassment is a serious violation of these principles.

The purpose of establishing these principles is to regulate the working principles for operating mechanisms for prevention, support, empowerment, investigation, and sanctions to create a work environment at Oncosem completely free from gender-based harassment, sexual harassment, and sexual assault.

These are applicable to everyone in our company, regardless of gender, sexual orientation, level, seniority, status, or other protected characteristics.

It covers all individuals, including employees, subcontractor representatives and their employees, all individuals and business employees from whom services are received, customers, and anyone interacting with our company, without any limitation of place and time.

Oncosem does not tolerate any physical, sexual, racially motivated, psychological, or verbal harassment, inappropriate and demeaning jokes and comments, physical or verbal violence, or any attempts at bullying. Feedback, objections, and criticisms should always be made in an appropriate and respectful manner.

Oncosem expects its employees to act considering cultural differences and sensitivities throughout all communications.

Individuals encountering such situations should know they are not alone and that their company stands and will stand by them, and they should share their experiences with their Managers.

3.8 Fair Employment

"Fair employment opens the door to an environment where every individual can realize their potential."



Oncosem views its employees as the source of its success and has set global standards to provide a work environment where equal opportunities are offered, and everyone is treated with respect and fairness. Decisions related to employment, such as recruitment, promotion, compensation, termination of employment, training opportunities, and assignment, are based solely on qualifications, performance, merit, and experience. These decisions are made without discrimination based on gender, race, skin color, language, religion, nationality, age, marital status, social and economic status, union membership, ethnic

origin, disability, pregnancy, sexual orientation, political opinion, or any other characteristic, adhering strictly to the principle of equality.

All Oncosem employees are expected to act in accordance with this fair employment policy when making decisions that could affect employment processes.

All practices related to working hours, conditions, and wages at Oncosem are conducted in compliance with the applicable labor and employment laws of the relevant country.

3.9 Employee Health and Safety

"The safety, health, and well-being of each employee are the cornerstones of our success."

We are committed to creating and maintaining a safe work environment for our employees. Our managerial staff are expected to demonstrate awareness and exemplary leadership, ensuring this commitment is reflected across the entire team.

The creation and dissemination of an Occupational Health and Safety culture are pursued with an awareness of defining principles, rules, and commitments related to health and safety at work. Through our managers and relevant departments, training on health and safety procedures applicable to all employees' work and responsibilities is provided.

Employees are obligated to comply with the prevailing Occupational Health and Safety Law, its secondary regulations, and other related legislations.

Potential hazards in the workplace are identified, and risk assessments are conducted for continuous improvement. In line with legislation, our employees are regularly followed up with occupational health and safety services.

Oncosem is responsible for taking all necessary precautions, providing, and ensuring the use of equipment and personal protective gear, in compliance with legal obligations related to occupational health and safety, relevant national and international standards, and conditions.

Oncosem ensures compliance with occupational health and safety regulations and rectifies any discrepancies. Employee feedback and participation are encouraged and facilitated.

Oncosem commits to adhering to the following principles, along with all its employees:

- To act according to applicable legal regulations and standards.
- To provide regular training and awareness programs for employees to create awareness on occupational safety matters.
- To regularly assess risks and take necessary precautions to ensure the safety of the work environment.
- To provide appropriate personal protective equipment to employees when necessary and promote its use.
- To develop emergency response plans to be prepared for any emergencies.

- To monitor employee health, conduct regular health screenings, and provide necessary health services.
- To continuously monitor and assess occupational health and safety performance, creating improvement plans when necessary.

3.10 Protection of Personal Information and Privacy

Oncosem respects the privacy of its employees and business partners, processing their data in compliance with the legislation to the extent permitted by law to enhance company operations.

Employees responsible for processing personal data are obligated to:

- Act in accordance with Oncosem's corporate policies and relevant legislation regarding the protection of personal data.
- Process such information only for legitimate business purposes, in a limited and measured way.
- Process information in compliance with the law and the principle of honesty.
- Confirm consent from the individuals concerned when required by the legislation.
- Adhere to the company's data inventory in processing activities.
- Provide necessary information to the individuals concerned as required.
- Correct incorrect information when requested by the individuals concerned or Oncosem.
- Keep personal data up to date.
- Limit access to personal data and ensure its confidentiality and security.
- Not disclose personal data to unauthorized third parties.

In the event that any personal information is compromised due to non-compliance with Oncosem's policies and procedures, legislation, or the Personal Data Processing Inventory, including instances where personal data is processed inappropriately, or in the event of loss, theft, or unauthorized access to laptops, mobile devices, printed documents, or equipment containing employee information, employees must promptly notify their unit managers.

3.11 Interaction with Social Communities

Oncosem views the communities in which it operates as significant stakeholders and is committed to leaving a positive legacy and performing well socially as a responsible company. Oncosem expects all its employees to support this responsible approach. During its operations, Oncosem pays attention to the following:

- Better understanding the range of stakeholders affected by its activities, their perceptions of the activity, and their relationships with each other.
- Understanding the positive and negative impacts of its activities to manage all impacts effectively.
- More effective risk management.

- Enhancing understanding among local stakeholders of the contribution of the activity to the local community and the potential impacts that may arise from the activity.
- Establishing forward-looking communication with local communities, managing impacts properly, and contributing to sustainable social and economic development through a better-structured plan and performance indicators.
- Leaving a positive legacy.

3.12 Relationship with Suppliers

"A supplier is a crucial link in a company's value chain; relationships built on trust, respect, and mutual benefit are the foundation of success."



The term suppliers include Oncosem and its affiliates' suppliers, subcontractors, consultants, service providers, and agents.

Oncosem encourages its suppliers to approach their employees and the communities in which they operate with respect for human rights and in compliance with the Oncosem Code of Conduct. Besides demanding compliance with all applicable national laws, Oncosem also encourages its suppliers to act in accordance with the ILO's core labor standards and the requirements of the UN Global Compact. Furthermore, Oncosem aims to engage with its suppliers to raise awareness about potential human rights issues.

3.13 Business Partner Guidelines

The Oncosem Business Partner Code of Conduct delineates the expectations we hold for our partners. These principles are integral to our core operations, and we are committed to exerting effort towards their implementation.

As an Oncosem Business Partner, you are expected to apply these principles within your own business operations and demand similar adherence from your own partners. These Business Partner Conduct Guidelines are universally applicable to all our partners, irrespective of their operational region or country.

In addition to adhering to the principles outlined in these Oncosem Business Partner Conduct Guidelines, compliance with all applicable laws, regulations, and standards is expected. This includes, but is not limited to, the following areas:

- **Health and Safety:** For Oncosem, prioritizing health and safety is non-negotiable, and we expect our partners to share this commitment. Adherence to prevailing safety regulations, fostering a safe and healthy work environment, and promoting an accident-free workplace are imperative.

- Integrity and Legality: Conducting business in a fair, transparent, and lawful manner is essential. This includes abstaining from any form of bribery, including giving, soliciting, or receiving bribes, as well as avoiding improper payments or corrupt practices.
- Transparency in Business Relations: To mitigate the risk of conflicts of interest, we expect full transparency from our partners in all business decisions and transactions involving Oncosem. Disclosure to Oncosem is required if any Oncosem employee or their close contacts have a direct or potential economic interest in your business.
- Compliance with Competition Laws: Our partners are required to comply with all applicable competition laws, avoiding practices such as price fixing, market sharing, production limitations, or bid rigging.
- Confidentiality and Intellectual Property: We expect our partners to safeguard Oncosem's confidential information and not disclose it to unauthorized third parties. Protecting Oncosem's assets and complying with all intellectual property rights laws is mandatory. Any infringement of Oncosem's or others' intellectual property rights is unacceptable.
- Financial Integrity: Maintaining accurate and complete financial records is critical for Oncosem, and as our partner, adherence to all relevant laws, reporting standards, and accounting principles is essential.
- Anti-Money Laundering: As our partner, it is crucial to have adequate internal controls in place to monitor and minimize the risk of involvement in money laundering activities.
- Diversity and Inclusion: Oncosem believes diversity and inclusion are key to global success. We expect our partners to create an inclusive work environment that respects individuals irrespective of age, gender, race, disability, faith, nationality, social status, or any other legally recognized status. Efforts against discrimination and harassment in the workplace are also required. This comprehensive framework underpins our expectation for ethical and responsible business conduct among all Oncosem Business Partners.
- Fair Compensation and Legal Compliance: Employees of Oncosem business partners should benefit from fair compensation reflective of the profitability of their work, along with reasonable work breaks and paid leave in adherence to local laws.
- Prohibition of Child Labor: Oncosem business partners must not employ child labor within their facilities or those of their suppliers. Employment practices should align with national laws.
- Freedom of Movement for Employees: Oncosem business partners must ensure that employees retain their freedom of movement post-employment. Practices such as withholding personal documents (e.g., passports, identification, compensation payments) to restrict movement are unacceptable. Forced or involuntary labor is strictly prohibited.
- Compliance with Legislation and Environmental Stewardship: Business partners are required to always comply with current legislation and strive to minimize environmental impact. They should identify areas with environmental impact and pursue continuous

improvements in these areas (e.g., waste reduction, minimizing energy consumption, recycling).

- **Reporting and Handling Concerns:** Oncosem business partners must provide mechanisms/tools to report workplace concerns or potentially illegal activities to management confidentially and, if necessary, take corrective actions.
- **Adherence to Oncosem Code of Conduct:** The Oncosem Code of Conduct is mandatory and applicable to all our business partners. Our preference to work with partners is not solely based on the quality, price, and professionalism of services or products.
- **Transparency and Assessment:** To assess compliance with the Oncosem Code of Conduct, business partners must engage in open and transparent dealings with Oncosem. They may be asked to provide further information through a detailed self-assessment questionnaire. In certain situations, an on-site audit may be requested, and if necessary, a collaborative improvement program based on audit findings may be implemented.
- **Corrective Actions and Relationship Management:** Following an audit, if non-compliance is detected, the implementation of an appropriate corrective action plan will be required. Continuous violations of the rules may lead to the termination of our relationship with the partner or suspension of the relationship until sufficient progress in rectifying the violations is assured.
- **Legal Binding Provisions:** Oncosem requires business partners to accept the inclusion of legally binding reasonable provisions in contractual documents to ensure compliance with the principles outlined in the Oncosem Code of Conduct.

3.14 **Quality**

"Quality production does not just create a product; it builds a brand. Our aim is to maintain an effective quality system that is in compliance with regulatory requirements and focuses on continuous improvement with a customer-centric approach."

To meet the rapidly growing needs of the healthcare sector and anticipate future demands, we are committed to sustainable and innovative practices in developing products, processes, and services. Our goal is to produce high-quality products that can be utilized worldwide, contributing to the healthcare sector in alignment with national and international regulations and standards.

Gaining our customers' trust and enhancing patient safety and satisfaction are responsibilities shared by all Oncosem employees in terms of product and service quality.

The management and all Oncosem employees are deeply committed to our quality culture and supportive of continuous improvement. Our responsible, sustainable, and value-focused approach, coupled with our compliant and effective processes, ensures the highest quality in all our operations.

Oncosem adheres to the following principles and commits to their implementation across the organization:

- Compliance with the Ministry of Health and regulatory authorities' guidelines.
- Following quality system regulations, standards, policies, procedures, and good manufacturing practices.
- Striving to understand our customers' expectations and continuously improving to maximize customer satisfaction.
- Committing to continuous improvement to enhance our business processes, products, and services.
- Investing in the ongoing education and development of our employees.
- Implementing effective risk management and error reporting to prevent mistakes and address them appropriately when they occur.
- Taking all necessary security measures to store customer data securely and maintain its confidentiality.
- Promoting collaboration and meeting customer expectations at the highest level by effectively communicating with internal and external stakeholders.
- Continually tracking and implementing technological innovations to improve business processes and customer satisfaction.
- Ensuring all products are developed using appropriate controls and undergo all necessary testing before market release.
- Creating an environment that supports quality production and consumer safety.
- Maintaining an effective and experienced quality unit.

3.15 Conflict of Interest

"A conflict of interest arises when an employee's personal interests interfere with or conflict with their duties."



Oncosem acknowledges and respects the personal interests and activities of all its employees, expecting, however, unwavering loyalty from them. Employees are prohibited from engaging in activities that could conflict with Oncosem's business interests or interfere with the responsibilities assigned to them, aligned with the company's interests.

Employees must not use their positions or Oncosem's information and assets for personal gain or to provide inappropriate benefits to others.

To avoid risks associated with conflicts of interest, all Oncosem employees are required to disclose any actual or potential conflicts of interest to their managers. It is the responsibility of all unit managers to appropriately address and resolve these conflicts.

Oncosem commits to the following principles, alongside its employees:

- Requiring employees, managers, and other stakeholders to clearly declare their interests,
- Transparently sharing conflicts of interest within the company and the measures taken,
- Providing regular communications to employees and other stakeholders about the company's conflict of interest policies and practices,
- Creating an audit mechanism to identify and evaluate situations of conflict of interest,
- Offering regular training to employees on understanding and managing conflicts of interest,
- Providing these trainings to new hires and periodically updating existing employees,
- Raising awareness about ethical standards, conflict of interest policies, and company values,
- Ensuring employees are aware they can report conflicts of interest, which will be kept confidential and shared with the Director of Administrative Affairs,
- Ensuring complaints and allegations are securely handled and investigated.
- Granting employees the right to voluntarily resign or transfer to another unit in the event of a conflict of interest,
- Ensuring that employees who exercise these rights are not negatively judged or penalized,
- Defining clear policies and processes for employees, managers, and other stakeholders to follow in order to prevent conflicts of interest,
- Developing policies specifically aimed at evaluating and preventing the potential for conflict of interest, especially in critical decision-making and processes,
- Ensuring compliance with international and local corporate standards, and implementing conflict of interest policies in accordance with these standards,
- Ensuring that employees and managers act in accordance with these standards.

3.16 **Company Assets**

"All values of Oncosem are achieved through the work and dedication of Oncosem employees, and are an integral part of the company's entrepreneurial actions and operations."

Protecting all company property, assets, and business opportunities, including but not limited to know-how, patents, trademarks, real estate, business equipment, and office supplies, is one of our most important responsibilities.

All employees are expected to protect and preserve not only the company's property but also its intangible assets to continue and support the company's success and sustainable development.

Oncosem commits to the following principles, alongside its employees:

- Ensuring the physical and digital security of company assets,
- Protecting physical assets against theft, damage, and other adverse circumstances,
- Conducting regular inventory of goods and tracking them,
- Strengthening asset management through computer-based inventory tracking systems,
- Assigning responsibility for asset management to specific teams or individuals,
- Monitoring and controlling the use of goods and assets,
- Periodically assessing and updating critical assets,
- Conducting cost and value analyses of valuable assets throughout their economic life,
- Training staff to use company assets effectively and efficiently,
- Creating training programs focused on best practices for asset use,
- Ensuring that employees avoid misuse of company assets,
- Assigning specific responsibilities to employees regarding the use of assets.
- Employees should use internet access and send emails solely for work purposes,
- Oncosem reserves the right to read, view, and copy all email communications and internet usage as internet access and the email system are company resources,
- Avoid using unlicensed software,
- Do not compromise network security,
- Refrain from accessing or downloading content related to adult material, gambling, betting, malicious, and illegal websites,
- Perform regular maintenance of assets and meet repair needs in a timely manner,
- Follow regular maintenance schedules for critical equipment,
- Update assets to keep pace with technological advancements,
- Regularly evaluate assets that have become obsolete or difficult to use,
- Ensure asset management processes comply with relevant legal regulations both internally and externally,
- Optimize asset management processes using internal control systems,
- Ensure all legally required records are properly maintained,

- Avoid responding to requests for confidential company business information from third parties without senior management's approval,
- Take necessary measures to protect company employees, information and information systems, and manufacturing and administrative facilities from potential natural disasters or malicious acts,
- Implement crisis planning for natural disasters and similar situations to ensure business continuity with minimal loss,
- Take all necessary precautions to prevent the theft or loss of company assets.

3.17 Data Protection and Information Security

"We expressly state all our company secrets in bold, underlining their absolute confidentiality."



Our company's knowledge, expertise, and all sensitive information are maintained in strict confidence. Our commercial secrets are explicitly marked as strictly confidential, emphasized in bold.

One of our competitive advantages is our confidential business information, experiences, and ideas, collectively referred to as intellectual property. It's imperative to protect our intellectual property from unauthorized sharing and misuse. Our secret information and intellectual property rank among our most valuable assets. Progress and success in healthcare services hinge on the enhancement and development of new products and technologies. By safeguarding our confidential information, we maintain our competitive edge and amplify our societal impact. Hence, if it becomes necessary to share confidential information with third parties, we also require these parties and/or our business partners to maintain the secrecy of this information.

We protect our employees' personal data against unauthorized disclosure. Furthermore, the handling of our employees' personal data is conducted with meticulous attention to current regulatory requirements. To prevent unauthorized collection, use, and processing, we implement specific technical, organizational, procedural, and contractual measures to safeguard confidential and personal data.

To comply with the principles of confidentiality, integrity, and accessibility required by the General Data Protection regulations, we identify information assets, assess risks, and implement control measures for risk management. This risk management methodology is continually applied for our company, our customers, and our suppliers.

Included within our general data protection policy are topics such as:

- Ensuring the continuous confidentiality, integrity, availability, and resilience of processing systems and services,
- Protecting the rights of data subjects regarding the collection of confidential information and access to personal data, as well as their correction, deletion, and portability,
- Ensuring that all consent-based information meets active, informed consent standards, and that such consents are recorded and auditable,
- Ensuring legal safeguards are in place to legitimize the transfer of personal data (if a transfer is necessary),
- Keeping records of personal data processing activities and regularly testing and assessing the effectiveness of the above measures.

3.18 Social Media

"Protect the reputation of your company and yourself."



All tools or services that facilitate communication over the internet are part of social media. Social media encompasses not only traditional well-known platforms like Facebook, Twitter, WeChat but also other platforms that involve user communications and might be used without considering them as social media.

- Locations, content, and details of office meetings should not be tagged on social media, for example, posts like "We are at xxx hotel for a meeting with the xxx team for xxx purpose" on FourSquare, Twitter, Facebook cannot be made. Applications that could pose risks in terms of privacy, security, and competition should not be used,
- Care should be taken when uploading any content (text, images, videos, etc.) to social media platforms. Actions that could violate brand or copyright laws should be avoided,
- The language and expressions used on social media should be carefully considered. Discriminatory, harassing, offensive, racist, sexual, ethnic, religious, or physically

derogatory statements should not be made, shared, or facilitated as they could lead to serious legal issues,

- Messages that could harm the company's or an individual's reputation should not be shared,
- Caution should be exercised not to share company confidential information,
- Oncosem employees are responsible for the messages they share or publish online,
- Respect should be shown for copyright, fair use, and financial disclosure laws,
- If identifying as a company employee on social media, ensure that your profile and the content you share are appropriate for your colleagues and customers,
- Do not use the company logo,
- Statements and expressions that should not be made in face-to-face conversations with colleagues, customers, and suppliers should not appear on social media,
- All employees are responsible for adhering to the code of conduct. It should be remembered that every "status", "tweet", "comment" on social networks is in a public space,
- Information regarding registered, unregistered, or under-registration products and similar products from competing companies should not be shared, and images, photos, slide shows, and links should not be added,
- When encountering negative commentary about the company or products, regardless of the subject matter, one should remain sensible and polite.

3.19 **Anti-Bribery and Corruption**

"No advantageous deal justifies the violation of the law."

Bribery involves giving, offering, or promising any form of valuable item or advantage to domestic or foreign public officials, or to private or legal persons, to improperly influence their actions or decisions within their discretion.

Being a reputable company means conducting business in a legal, honest, and ethical manner. Oncosem is a firm that commits to operating in accordance with all legislation, laws, and standards. Any form of bribery and corruption is strictly prohibited within Oncosem, which adheres to a zero-tolerance policy towards these practices. We do not provide or accept illegal or unjust benefits or advantages. Specifically, we are firmly committed to legal and ethical principles in combating corruption.

Violations of current laws can lead to significant fines and criminal consequences for both the company and individuals. These prohibitions also extend to unethical exchanges that could improperly influence the decisions or actions of others.

It is explicitly forbidden for employees to offer anything of value in business relationships to unfairly influence others. This applies to interactions with international countries,

governments, and the private sector. Opportunities requiring improper payments must never be accepted. Transparency is key.

Similarly, our company prohibits the acceptance of anything of value given by any person or company intended to influence an action or to gain an improper advantage.

Everyone working for or on behalf of Oncosem, including interactions with government officials and healthcare professionals, is responsible for conducting business in compliance with all applicable laws and regulations.

We have a system of disciplinary measures that allows for the termination of employment contracts or business relationships in accordance with existing legal standards when necessary.

Oncosem's zero-tolerance policy for bribery applies to all operations, including group companies and projects in all countries where Oncosem operates. Oncosem does not engage with suppliers, subcontractors, and other business partners who violate anti-bribery or corruption laws. Employees must ensure that other companies they interact with are aware of Oncosem's zero-tolerance principle and report any violations encountered.

Oncosem commits to the following principles, alongside its employees:

Encourages the reporting of any suspicions or information regarding corruption and bribery activities to Managers without fear and in good faith.

In any case of doubt, always consult the Legal Department.

- Providing training and raising awareness about corruption and bribery for employees, suppliers, and other stakeholders,
- Establishing effective monitoring and auditing mechanisms within the company to continuously strive to detect corruption and bribery,
- Ensuring the company's business practices are transparent and managed in accordance with the principle of accountability,
- Defining an anti-bribery policy and sharing these policies with all stakeholders,
- Implementing effective controls over the supply chain, encouraging suppliers and business partners to participate in the fight against corruption and bribery,
- Ensuring compliance with anti-corruption and bribery legal regulations in the regions where the company operates and managing relationships within this framework.

3.20 Fair Competition and Trade



How to act in the marketplace is determined by competition laws. Everywhere we conduct business, we comply with all such laws and never seek competitive advantage through unethical or illegal business practices. This includes a commitment not to engage in behavior that demeans our competitors, imposes restrictions on suppliers or customers, or misuses market dominance through improper agreements or any form of collusion.

Oncosem believes that fair competition contributes to development, progress, and the welfare of society and is one of the fundamental principles of a properly functioning market.

Oncosem prohibits its employees and business partners from engaging in activities that would result in an unfair advantage, including dealings with competitors, suppliers, or customers.

We compete with competitor companies in an active and mutually respectful manner, only within legal and ethical frameworks, and avoid violating competition law.

Under no circumstances do we make agreements with competitors or other companies that aim to directly or indirectly restrict, distort, or limit competition in any market for goods or services, nor do we engage in concerted actions that would have or could potentially have that effect.

To prevent practices that could hinder competition, it's crucial to always act cautiously and sensibly, seeking advice before engaging in any actions or inactions that could pose a risk. Agreements or activities that could disrupt or distort the normal course of competition with competitor firms are not permitted under any circumstances. Contact with competitors that poses a risk or raises doubts regarding adherence to established principles or competition legislation should be avoided.

Negotiations or agreements with competitors under any circumstances on matters such as pricing, discounts, commissions, margins, or any other commercial terms with customers or third parties (except legitimate commercial cooperation agreements), limiting productions, services, markets, technical development, or investments, allocating customers, regions, and/or markets, coordinating bid submissions in competitive tenders through fraudulent offers or other means (except actions within the scope of legitimate commercial cooperation agreements), and boycotting certain customers or suppliers, other competitors, or new enterprises attempting to enter the market are prohibited.

The exchange or procurement of commercially sensitive confidential information that could reduce strategic uncertainty in the market (directly or through third parties) with competitors should be avoided. When participating in industry associations, potential risks of engaging in anti-competitive behavior should be avoided.

Contracts with non-competitor companies, as well as all types of commercial cooperation agreements made with companies outside the Group, must comply with Competition Law. Activities in markets where there is a high market share should be conducted with special caution, avoiding any unilateral actions, practices, or agreements that aim or result in excluding competitors from the market, preventing new competitors from entering, or imposing conditions that exploit a dominant position over customers or business partners.

These rules apply to all employees and business partners within Oncosem and adherence to these principles and policies is mandatory.

3.21 Discipline

“Discipline is the bridge between goals and accomplishment”



Ensuring that disciplinary processes are managed in a fair, transparent, and effective manner is crucial. All employees must contribute to achieving the company's objectives by adhering to the rules and respecting the principles of Oncosem.

- All employees are expected to behave in accordance with company rules and procedures. Non-compliant behaviors can lead to serious consequences.
- A standard of proper, respectful, and professional communication and behavior is expected among all employees.
- Disciplinary measures to be taken in case of rule violations are clearly stated. Employees are considered to have accepted the expected sanctions in advance if they violate the rules.
- Disciplinary actions are conducted fairly, providing the employee an opportunity to defend their case. Investigations and decisions are based on principles of impartiality and objectivity.
- Disciplinary actions are not solely punitive but are also designed to aid in the employee's improvement and development. The reasons behind negative behaviors are understood, and support is provided if necessary.
- Disciplinary processes are kept confidential, and the privacy of the individuals involved is protected. Information is shared only on a need-to-know basis with relevant parties.
- Disciplinary practices are regularly reviewed and updated as needed. The effectiveness and fairness of the processes are continuously evaluated.
- Managers are responsible for correctly implementing disciplinary processes. While acting fairly and consistently, they are obligated to protect the rights and safety of the employees.

3.22 Our Suppliers and Code of Conduct

We expect all our suppliers to adhere to the principles mentioned herein.

- Our suppliers will comply with all relevant national and international laws related to their operations,
- Will not employ child labor,
- Will not use any form of coercion or forced labor on their employees,
- Will adhere to relevant national laws and regulations regarding wages and working hours,
- Will not discriminate on the basis of race, religion, disability, age, sexual orientation, gender, or any other characteristic,

- Will implement Occupational Health and Safety standards, ensuring a safe and healthy working environment for their employees,
- Will be prepared for any potential disruptions such as natural disasters, terrorism, software viruses, diseases, etc., including disaster plans aimed at protecting their employees,
- Will comply with national and international anti-bribery laws,
- Will effectively implement environmental laws, regulations, and standards, planning all their activities with climate protection in mind and setting climate protection targets,
- Oncosem reserves the right to verify compliance upon reasonable notice,
- Our suppliers are expected to adhere to ethical standards, human rights, health safety standards, and environmental standards.

"Oncosem employees are obliged to comply with the Code of Conduct. Failure to comply may subject them to disciplinary sanctions, up to and including termination of employment."

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