

LUNA GROUP CODE OF CONDUCT

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As Luna Information Technologies, we have been producing professional solutions and result-oriented projects in the field of Automatic Identification and Data Collection Technologies and Applications for all our business partners since 2009.

We continue to run all our brands under the name of Luna Group, including our structuring in the Media and Energy sectors, in our solution journey that we started with the field of informatics.

The code of conduct has been prepared to guide us by taking into account our values in events that will disturb us in our business life. As Luna Group, our business ethics, our respect for our employees, business partners and customers are always our first priority. As a future-oriented company group, we develop our understanding of management with our respect for people, as well as providing the best service with optimum solutions.

OUR BUSINESS ETHICS

Behind every activity and project we carry out; There are corporate values that determine the way of doing business, support the business culture and vision, and are adopted by each Luna Group employee.

Trust: *We have a relationship based on mutual trust, respect and success with our employees, business partners and customers.*

Loyalty: *We always show and feel our commitment to our customers and employees. We provide our colleagues with our best advice and support. Our commitment to quality, health, safety and the environment is undeniable.*

Solidarity: *We always share success with our employees. We stand together in the face of failures caused by bad luck.*

Integrity: *We are honest and ethical in all we do with our customers, suppliers, business partners and each other. We act in accordance with the relevant laws, regulations and internationally accepted ethical values in all our projects and works.*

Being Innovative: We seek advanced technology solutions that add value to our customers. We strive to constantly move forward with research and development as well as adapting existing processes. We take firm steps towards our goals by being a perfectionist, following innovation and developing technology every day.

Responsibility: Being aware of our responsibility for the management of all stages of our activities; We fulfill all the requirements of this responsibility, including social, environmental and economic issues, throughout its service life.

Teamwork: We believe that collaborative effort provides unlimited possibilities. We strive to achieve perfection by putting our common goals ahead of our personal interests. We always motivate each other in our work environment. We respect individual differences of opinion and value every personal opinion.

Leadership: : As a company, we always strive to be the best at what we do. We offer our customers products and services of the highest quality.

Conflict of Interest: As a company, we have always aimed to stay away from conflicts of interest. Taking advantage of our current mission; We do not derive personal benefits from persons and organizations with whom we have business relations through ourselves, our family or our relatives.

OUR RESPONSIBILITIES

1.Our Legal Responsibilities

Luna Group employees and the parties with whom they have business relations, we carry out all our works and transactions within the scope of the laws of the Republic of Turkey and international law. While carrying out all our activities and transactions, we take an equal distance from all institutions and organizations without any expectation of benefit, and we fulfill our obligations with this sense of responsibility.

2.Our Responsibilities Towards Our Customers

We work with an understanding focused on customer satisfaction and responding to the needs and demands of our customers in the shortest time and in the most correct way. We deliver our services on time and under the conditions we promised; We approach our customers with respect, discipline, fairness, equality and courtesy.

3.Our Responsibilities Towards Employees

We approach our employees honestly and fairly, and ensure that a respectful, safe and healthy working environment is created. It makes the necessary effort for the individual development of our employees, supports them in volunteering for appropriate social and communal activities with a sense of social responsibility, and has the right to convey their job or personal problems or suggestions or wishes on any subject to their superiors in accordance with the hierarchical structure.

4.Our Responsibilities Towards Our Partners

Luna Group; It acts with the awareness that the relationship it establishes with its suppliers, customers and other business partners is important for the success of the company, always pays attention to the determined business conditions and fulfills its responsibilities in this direction.

5.Our Responsibilities Towards Our Suppliers/Business Partners

We act fairly and respectfully as expected from a good customer, and we take the necessary care to fulfill our obligations on time. We carefully protect the confidential information of the people and organizations we do business with and our business partners.

6.Our Responsibilities Towards Environment and Society

The protection of the environment based on human rights as a basic principle; education and charity work, the elimination of crime and corruption are very important to us. We also protect human health, natural and cultural heritage with the environmental and social sustainability thought we apply in all the projects we take part in. We do not provide or accept products and services such as bribes or gifts in excess of the purpose, etc.

7.Our Responsibilities Towards Our Competitors

We compete effectively only in areas that are legal and ethical, and we avoid unfair competition.

OUR FUNDAMENTAL POLICIES

A. Conflict of Interest Policy

It is essential that Luna Group employees stay away from situations that may create a conflict of interest. It is the most important responsibilities of all employees not to use the company name, identity and power for personal benefit, and to avoid situations that may adversely affect the name and image of the company.

Application Basics

1. Activities That May Create Conflict of Interest

Employees do not enter into a business relationship that provides mutual or unrequited benefits with their family members, friends or other third parties that they have a relationship with. Employees cannot gain any commercial interest by leaking any company information from inside. It is essential that the employees do not work for another person or institution for a fee, during or outside working hours, and do not work directly or indirectly.

B. Political and Social Activities Policy

Company resources and opportunities cannot be used to support political activities, donations cannot be made to political parties, and political campaigns cannot be supported. Employees cannot use the company's name, position, title and Company resources in their political and social activities.

C.Policy on Preventing Misuse of Company Assets and Resources

Employees are obliged to use and protect company assets and resources duly and in accordance with local/international laws. In the use of resources on behalf of the company, the interests of the company are taken into account. Company assets, facilities and personnel cannot be used outside the company under any name and for the benefit of whoever, without the benefit of the company.

D.Protection of Confidential Information Policy

Any information that is not disclosed to the public is classified as confidential information. All kinds of information can be included in this scope such as; trade secrets, marketing and service plans, customer information, personnel information, project blueprints, designs, financial information, etc. The company takes the necessary information processing security measures to protect confidential information. expects them to use confidential information in their possession only for their designated purposes and as part of their duties within the company.

E.Policy on Creating and Maintaining a Fair Working Environment

Luna Group considers the establishment and maintenance of a fair working environment for its employees as one of its top priorities. It is aimed to increase the success, development and loyalty of the employees by creating a fair, respectful, healthy and safe working environment in compliance with all relevant laws and regulations.

F.Competition Law Compliance Policy

Luna Group; accepts competition as a competition in compliance with the legislation that enables economic decisions to be made among all companies in the sectors in which it operates.

G.Anti-Bribery and Anti-Corruption Policy

Luna Group employees should not provide material or non-material benefits to third parties and institutions, directly or through intermediaries, for any benefit. In addition, employees should not accept such offers made to them.

H.Gift Accepting and Giving, Hospitality, Donation and Sponsorship Policy

Employees who are paid in return during their duties; It is essential that they do not accept all kinds of gifts that may affect their impartiality, decisions and behaviors, whether they have economic value or not, and that they do not attempt to provide gifts, hospitality or benefits to third parties that may have such effects. Luna Group directors and employees; - They can give and receive treats, gifts (chocolate, flowers, etc.) and meals at acceptable standards in the business world. - They can receive gifts such as awards, which have symbolic value and as a memory of the day, in seminars and similar organizations they attend on behalf of Luna Group.

EMPLOYEE RESPONSIBILITIES

There are a number of rules that Luna Group employees must follow. Compliance with these rules is the primary responsibility of all employees. In this direction, all Luna Group employees;

- *Acting in accordance with laws and regulations in all circumstances,*
- *Performing his/her duty completely and without delay in accordance with the provisions of the legislation in force, company regulations and circulars and the instructions given by his/her superior under all circumstances,*
- *Eading the Luna Group Code of Business Ethics, knowing, understanding, internalizing and acting in accordance with the rules, principles and values in it,*
- *Learning the general and business-related policies and procedures applicable to the company,*
- *Consult their manager about potential violations of themselves or others in their assigned job.*

MANAGER RESPONSIBILITIES

Luna Group managers have additional responsibilities in addition to the responsibilities defined for employees within the scope of ethical rules. Accordingly, managers;

- *Ensuring the creation and maintenance of a corporate culture and working environment that supports ethical rules,*
- *Being an example for the implementation of ethical rules with their behaviors, educating their employees on ethical rules,*
- *Supporting its employees in submitting their questions, complaints and notifications about ethical rules,*
- *To provide guidance on what to do when consulted, to take into account all notifications and to forward them to the Ethics Committee as soon as it seems necessary,*
- *Responsible for ensuring that the business processes under its responsibility are structured in a way that minimizes the risks related to ethical issues and to implement the necessary methods and approaches to ensure compliance with ethical rules.*

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