

# UPCOM CODE OF CONDUCT

## *Business Ethics and Responsible Conduct Declaration*

### UPCOM TELEKOMUNIKASYON BILISIM TEKNOLOJILERI SANAYI VE TICARET LIMITED SIRKETI

Kucuksu Mah. Rasathane Cad. No: 35/R2 D:2 PO:34684 Uskudar, Istanbul, Turkiye | info@upcom.com.tr | www.upcom.com.tr

<b>Document Title</b>	Code of Conduct & Business Ethics Declaration
<b>Document No</b>	UP-COC-2026-01
<b>Issue Date</b>	13 May 2026
<b>Revision</b>	01
<b>Status</b>	Issued
<b>Scope</b>	Corporate conduct, business ethics and responsible commercial practices

#### Corporate Commitment

UPCOM conducts its business with integrity, transparency and accountability. This Code of Conduct defines the minimum ethical, legal and commercial standards expected in all UPCOM activities, including sales, procurement, logistics, documentation, quality, supplier relations and customer communications.

The document is not product-specific. It applies to UPCOM as a company and may be shared with customers, suppliers, distributors, public institutions and tender authorities as a corporate ethics and responsible business declaration.

## 1. Purpose and Scope

This Code of Conduct sets out the principles that guide UPCOM Telekomunikasyon Bilisim Teknolojileri Sanayi ve Ticaret Limited Sirketi in its business activities. It applies to company management, employees, authorized representatives, commercial intermediaries and business partners when they act for or on behalf of UPCOM.

Where a supplier, distributor, subcontractor or service provider is contractually linked to UPCOM, UPCOM expects that party to operate in a manner consistent with the principles stated in this document.

## 2. Core Principles

Principle	UPCOM Commitment
<b>Integrity</b>	Business is conducted honestly and without deception, hidden arrangements or misleading statements.
<b>Legal Compliance</b>	Applicable laws, regulations, contractual obligations, export/import rules and product compliance requirements are respected.
<b>Fair Commercial Conduct</b>	Customers, suppliers and partners are treated fairly, with transparent communication and commercially accurate documentation.
<b>Quality Responsibility</b>	Products and documents supplied by UPCOM must match the declared scope, technical specifications and applicable compliance claims.
<b>Accountability</b>	Decisions, records and business commitments must be traceable, reviewable and supported by proper documentation.

## 3. Compliance with Laws and Regulations

UPCOM is committed to complying with applicable national and international laws, regulations and contractual requirements. This includes, where relevant, company law, tax law, customs rules, export and import controls, product compliance rules, occupational health and safety requirements and data protection principles.

No employee, manager, agent or business partner acting for UPCOM may knowingly bypass legal requirements or create documents that misrepresent the nature, origin, compliance status, value, technical specification or intended use of supplied products.

## 4. Anti-Bribery and Anti-Corruption

UPCOM does not tolerate bribery, corruption, facilitation payments, kickbacks or improper benefits in any form. This applies to dealings with public officials, private companies, suppliers, customers, consultants, freight forwarders, customs brokers and any other business counterparties.

- No payment, gift, benefit or commission may be offered or accepted to improperly influence a business decision.
- All commissions, discounts, rebates and commercial incentives must be commercially justified, documented and lawful.
- Requests for unofficial payments, false invoices or non-transparent arrangements must be rejected and escalated internally.

## 5. Gifts, Hospitality and Business Courtesies

Reasonable business hospitality may be acceptable only when it is modest, transparent, lawful, occasional and not intended to influence a decision. Cash, cash equivalents, hidden benefits, personal favours and excessive hospitality are not permitted.

## 6. Fair Competition and Market Conduct

UPCOM competes fairly and does not engage in price fixing, bid manipulation, market allocation, collusive tendering, unlawful exchange of competitively sensitive information or any other conduct that restricts fair competition.

Commercial claims, quotations, datasheets, certificates and compliance statements must be accurate and must not create a false or exaggerated impression of product characteristics, approvals, manufacturing scope, standards or regulatory status.

## 7. Trade Compliance, Customs and Documentation

UPCOM is committed to accurate and lawful international trade documentation. Commercial invoices, packing lists, certificates, declarations, HS codes, origin statements, transport documents and customs records must reflect the actual transaction and available supporting evidence.

- Product origin, value, quantity, description and compliance status must not be intentionally misstated.
- Export restrictions, sanctions, dual-use considerations and destination requirements must be reviewed when relevant.
- Supplier and customer documents must be retained in a manner that supports traceability and auditability.

## 8. Accurate Records and Financial Integrity

UPCOM business records must be complete, accurate and reasonably verifiable. False entries, backdated documents, unsupported credits, hidden side agreements and misleading transaction records are not permitted.

Accounting, pricing, supplier costs, freight costs, tax documentation and payment records should be maintained with sufficient clarity to support internal control, audit review and customer or authority requests where applicable.

## 9. Conflicts of Interest

Business decisions must be made in the best interest of UPCOM and without improper personal influence. Any actual or potential conflict of interest involving customers, suppliers, relatives, personal financial interests or outside business relationships must be disclosed and reviewed.

## 10. Confidentiality, Data Protection and Intellectual Property

UPCOM protects confidential business information, customer data, supplier data, technical documents, pricing, commercial terms, drawings, product codes, software data and other non-public information. Such information may be used only for legitimate business purposes and shared only with authorized parties.

Personal data must be handled responsibly and only to the extent necessary for legitimate business, contractual or legal purposes. Intellectual property rights, trademarks, copyrights, technical know-how and third-party confidential information must be respected.

## 11. Human Rights and Labour Principles

UPCOM supports responsible business conduct and expects work to be performed voluntarily, lawfully and with respect for human dignity. Forced labour, child labour, discrimination, harassment, intimidation and abusive working practices are not acceptable.

- Employment and business relationships should be based on competence, lawful work status and fair treatment.
- No person should be discriminated against because of irrelevant personal characteristics or protected status under applicable law.
- Workplace behaviour must remain respectful, professional and free from harassment or abuse.

## 12. Health, Safety and Environment

UPCOM expects its activities and supplied products to be handled with reasonable care for health, safety and environmental protection. Employees, suppliers and service providers must follow applicable safety rules and avoid actions that create unnecessary risk to people, property or the environment.

Waste, packaging, transport, storage and product handling should be managed responsibly. Environmental claims must be accurate and supported by available documentation.

## 13. Product Quality and Compliance Claims

UPCOM shall not issue or publish product compliance documents, certificates, declarations, datasheets or technical claims unless the wording is consistent with the applicable product scope and available supporting documentation.

- CE, CPR, RoHS, REACH, warranty, origin and similar statements must be issued with correct product scope and limitations.
- A declaration must not imply approval, testing or certification that has not been obtained or technically supported.
- Product substitutions, configuration changes or accessory differences must be reviewed before a compliance document is reused.

## 14. Supplier and Business Partner Expectations

UPCOM expects suppliers, manufacturers, logistics service providers, consultants, agents, distributors and other business partners to act lawfully, ethically and transparently. Partners are expected to provide accurate technical, commercial and compliance information when requested.

UPCOM may refuse, suspend or terminate relationships where there is credible evidence of bribery, fraud, document falsification, illegal labour, severe safety risk, intentional misrepresentation or repeated non-compliance with agreed requirements.

## 15. Reporting Concerns and Non-Retaliation

Any suspected violation of this Code of Conduct, including bribery requests, false documentation, compliance misrepresentation, conflict of interest, harassment, fraud or unsafe conduct, should be reported to UPCOM management.

Reports may be submitted by e-mail to [info@upcom.com.tr](mailto:info@upcom.com.tr) or through the relevant business contact. UPCOM will review concerns in good faith and will not tolerate retaliation against any person who reports a concern honestly and responsibly.

## 16. Enforcement and Corrective Action

Violations of this Code of Conduct may result in corrective action, contract review, supplier review, termination of business relationship, disciplinary action or notification to relevant authorities where required by law or contract.

UPCOM may update this document when legal, commercial, operational or compliance requirements change. The latest controlled version should be used for customer, tender and website publication purposes.

## 17. Declaration

UPCOM confirms that this Code of Conduct represents the company's corporate commitment to ethical business conduct, lawful operations, responsible documentation, fair commercial behaviour, respect for people and responsible product compliance communication.

<b>Authorized by</b>	UPCOM Telekomunikasyon Bilisim Teknolojileri Sanayi ve Ticaret Limited Sirketi
<b>Name / Title</b>	_____
<b>Date</b>	_____
<b>Signature</b>	
<b>Company Stamp</b>	

This document is a corporate policy and business ethics declaration. It is not a product certificate and does not replace product-specific technical declarations, certificates, declarations of conformity or contractual terms where these are required.