

CODE OF CONDUCT

Intron saglik LTD

Code of Conduct Intron

Preface

INTRON is a company that achieves special success and acts with high standards, and this is not only the case from a technological point of view, but also acts with this mentality in terms of good and fair behavior in competition and compliance with the "rules of the game" in our relations with our employees, customers and business partners.

For this reason, INTRON established a set of codes of conduct valid all over the world in which the basic rules related to various areas of our commercial relations are addressed and regulated in 2014. This set of codes of conduct has proven itself. The reward for adhering to this code of conduct is the trust in our company and the high reputation that the INTRON brand enjoys in the world markets. We wholeheartedly believe that sustainable economic success is inextricably linked to rights and law as well as to the set of rules we have established within ourselves, and in this context, the contribution of each employee is of great importance.

After the revision in 2014, when we made aspects such as product security, environmental protection and protection

of personal data even more perfect, the set of codes of conduct 2016

With the current version, it was changed once again and international labor standards were firmly adopted for INTRONIA. Beyond that, we've made changes to the editing that bring easier clarity. This set of conduct is fully compliant with the GLOBAL standard code of conduct.

The Code of Conduct does not require the reflection of all legal rules applicable to our business conduct, but rather refers to specific subject areas that are decisive for the sustainable success of INTRON and which, in the event of a breach thereof, may result in serious financial disadvantages or reputational damage. Therefore, all managers and employees are expected to act in accordance with the law and rules in cases that are not clearly stated in this code of conduct.

If you use this set of codes of conduct as a guide to your daily behavior, you'll notice that you're already enforcing many of these rules every day without any extra effort. However, there may be some areas where we can improve ourselves further.

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1 Basic principles.

Conduct in accordance with the law.

The competence, motivation, and responsible behavior of the employees are one of the important prerequisites for the success of INTRON. A sense of responsibility, justice, and tolerance towards nature as well as human beings significantly affect and shape our company culture.

The most important basic principles are:

- Conduct in accordance with the law and ethically perfect
- Social engagement
- Consideration of legal and cultural framework conditions
- A fair, polite, and respectful behavior towards employees and business partners
- Prevention of all forms of discrimination
- Professionalism, fairness, and reliability in all types of commercial relations
- Commitment to INTRON

2 Fair treatment of employees and business partners.

Fair treatment

Our business partners (customers, sales partners, and suppliers) and employees are at the heart of our activities. Our relationships with our business partners and employees should be underlined by mutual trust and sustainability. Honesty in trade, politeness in behavior, respect and fairness are expected by us. Fair treatment also includes fair working conditions. This includes the right to freely choose the work done, i.e. the prohibition of forced labor or slavery and human trafficking, the prohibition of child labor, the right to adhere to wage practices established or agreed upon legally or by contracts, freedom of association and the right to be treated humanely in the workplace. Apart from this, no one shall be disturbed or disadvantaged because of their race, skin color, nationality, origin, gender, sexual orientation, belief or worldview, political leanings, age, physical structure or appearance. These basic principles can only be truly applied when they are actually experienced by the management towards the employees and when the employees act in accordance with them among themselves.

How do we behave correctly?

To act correctly...

- *provide a good working environment, everyone is in their place and at the beginning of their own business.*
- *behave in a loving, polite, and respectful manner towards each other.*
- *respect cultural differences.*
- *not to negatively treat or discriminate against anyone based on their ethical or social origin, skin color, gender, age, marital status, physical disability, sexual orientation or other characteristics.*
- *To take and explain decisions in a transparent and reasonable manner.*
- *To strive to ensure fair working conditions not only within our own structure but also in our business partners.*

3 fair competitions.

Conflict of interest

One of the indispensable elements of a free market is the rules for the protection of fair competition. Almost all countries have passed laws that serve this purpose. The following points are important here:

- Conducting negotiations and exchanging information between competitors about prices, region sharing, production quantities and other parameters that are important for competition,
- prohibiting sales associates from fixing prices, and
- prohibition of abuse of market dominance position. Such prohibited agreements may include informational chats, gentlemanly agreements that are not bound by a particular form, or the decision on a measure that restricts competition or a specific behavior that serves to enforce that measure. Even when a behavior seems to be agreed upon, it is something that should be prevented. Violation of legal requirements can result in serious losses for the company, for example penalties or loss of reputation, and may result in the imposition of a personal fine against the employee concerned.

How do we behave correctly?

To act correctly...

- not to enter into agreements with competitors on the factors that determine competition (e.g. prices, price changes, conditions, production quantities, sales zones, customer sharing);
- not to exchange information with competitors about the factors that determine competition;
- not to have any influence on our sales partners' determination of prices or other conditions of sale (neither by threatening them with subsidies nor by promising advantages)
- not to interfere with tenders; that is, we disagree with our competitors regarding our bids and do not require the tendering parties to provide us with information that is not publicly available.
- not to abuse market dominant conditions and positions (e.g. by boycotting shipping);
- not to use untrue or misleading advertising statements.

4 Fight against bribery.

Is donation allowed?

We want to succeed in the competition because we amaze with the price, performance and quality of our products and services, not because the decision to sell is made in any other way.

Corrupt behavior is prohibited. Corrupt behavior exists if a person requests, accepts, offers or grants personal privileges for special treatment when initiating, issuing or processing an order. Both the person offering (or pledging) this benefit and the person who requests (or accepts) it are criminally liable. Personal privilege includes cash payments (e.g. donations), non-cash payments (e.g. coupons, invitations, prohibited price reductions) or gifts of monetary value.

The difference between giving or accepting invitations and gifts and corrupt behavior must be made clear. This may be permissible if there are "typical social advantages" and these invitations do not have the purpose of acting in a priority manner in connection with, for example, the conclusion of a contract. However, even the appearance of the existence of an inappropriate effect can quickly emerge in these cases, so special attention is required, especially when it comes to local and foreign officials (e.g. official representatives or government organisations) and employees working in the medical sector (e.g. doctors and pharmacists). In some countries, invitations to gifts and invitations given to these people are prohibited under all circumstances.

How should we behave?

We must pay attention to:

- Not making our business decisions based on whether it will give us personal benefit or not.
- Not to try to influence the business decisions to be made in favor of INTRON by offering or providing personal benefits to the decision makers of our business partners.
- Reject bribery attempts and immediately notify your supervisor or compliance officer.
- Be very careful about invitations and gifts, e.g. using €50 (or its numerical value in the corresponding currency in the respective country) as a criterion.
- Accepting and making available to the team gifts that are inappropriate but cannot be rejected as a matter of courtesy (for example, for an internal sweepstakes).
- Not to make any invitations and gifts to the office holders and medical sector employees working in official units. This does not apply to a lunch/dinner or hospitality of reasonable value provided as part of a product presentation or training organisation.
- If there is a doubt, discuss the situation with your manager or compliance officer.

Detailed information about these rules can be found in the company set of rules, which deals with compliance conditions.

5 Use of company property.

Diligence

Each employee is obliged to use the company's equipment, in particular machinery and tools such as information and communication systems, meticulously and in a purposeful manner. The workplace and all devices serving the employees or the business must always be kept clean and tidy, and damages must be reported to the manager.

Without a clear statement of the responsible unit in the company, company ownership may not be used for private purposes or taken out of areas within the boundaries of the company. Violations related to this may cause consequences in terms of criminal law or labor law for the relevant employee when necessary.

How do we behave correctly?

To act correctly...

- To protect all company property, such as information and communication systems, against loss, damage or misuse;
- Promptly report any damage or loss;
- Carefully and meticulously use the auxiliary materials made available by the Company.
- Comply with the travel rules applicable to the booking and billing of business trips.
- Use the company property for private purposes only with the permission of the director or to move it out of the boundaries of the company.
- Never use the Company's property for illegal or otherwise unauthorized purposes (e.g., access to prohibited sites).
- Check if a third party has damaged the company's property (e.g., through theft, deception, hacker attacks)

Detailed information on the individual aspects of this matter can be found in the company's set of rules for company safety.

6 protection of the company's confidential information and data processing security.

Genetic safety standards

Our production, inventions and know-how are extremely important for the long-term success of our company. For this reason, our intellectual property must be protected against being known to and accessed by third parties without permission. Within the scope of intellectual property, e.g. inventions and product prototypes, as well as e.g. company secrets, such as detailed information about customers, suppliers and software. Computing security supports the protection of intellectual property from unauthorized third party access, theft, leakage of our knowledge, or the effects of malware through various computing measures such as passwords, anti-virus software, or access concepts.

In addition, employees cannot participate in public discussions (e.g. presentation organizations, internet forums, etc.) or share information important to the company in public places (e.g. internet) without obtaining the necessary permissions with the qualifications of being members of TRON.

The loss of company secrets can lead to negative consequences for the future success of the company and, indirectly, on the employees of the company.

How do we behave correctly?

To act correctly...

- *to ensure that confidential information concerning the company is kept confidential and not passed on to unauthorized persons (including family members and friends);*
- *protect (encrypt) files and data from unauthorized access.*
- *consider the security standards established by the data processing and company security unit, both in personal use and in communication with third parties, and to use the same security standards with the same diligence for information made available to us by third parties.*
- *not to transfer confidential data when using social media tools.*
- *Not to record Company data on special electronic data carriers.*
- *not to connect special electronic devices to the company network.*

Detailed information on the safety standards to be complied with can be found in the Company set of rules on brand management and communication and company safety.

7 prohibitions of carrying information from within, giving.

On-premises information

Member rights serve the purpose of protecting investors. It prohibits the following.

- Use insider information to obtain direct or indirect personal Advantages in the purchase or sale of valuable papers, and
- unauthorized transfer of such information to others.

Insider information is information that is not yet known to the market and the knowledge of which can seriously affect the course of the relevant valuable papers (e.g. information about planned acquisitions, strategic agreements concluded in relation to the cooperation of the two companies, financial results, new products, problems with products or important contracts)

Prohibited insider information buying and selling activities can have serious criminal and civil rights consequences for both the employee and the company.

How do we behave correctly?

To act correctly...

- Not to use the information that we obtain through stock exchange-oriented companies within the scope of our commercial activities, and which may affect the exchange rate to buy or sell the shares belonging to this company, unless this information is known to the public.
- not to transfer such information to third parties and not to advise them on the purchase or sale of shares (third parties include family members, partners, friends or other INTRON employees who do not have this information).

8 prevention of conflicts of interest and individual actions.

Transparency

In daily working life, situations may arise in which private and personal interests or relationships are against INTRON. Conflicts can arise, for example, due to your own commercial (side) activities and, depending on the situation, the activities of family members. In order to prevent conflicts of interest, it is necessary to inform the relevant personnel unit for additional (commercial) activities, memberships or similar issues and to obtain permission for this. INTRON supports its employees to be active in community politics or social field. Whether an activity in associations, political parties or other social, political, or social institutions is carried out on behalf of an office or voluntarily, it must in any case be linked to the fulfillment of duties arising from the employment contract.

Conflicts of interest that have not been revealed and ancillary activities that have not been authorized may mean a loss for the company and may cause consequences related to labor law for the relevant employee.

How do we behave correctly?

To act correctly...

- to notify our directors of potential or existing conflicts of interest;
- To inform our colleagues or managers of the decisions in which we are exposed to conflicts of interest;
- failing to ensure that an activity that we ourselves are unable to perform ourselves due to a conflict of interest is carried out by a person close to us (e.g., family member, partner);
- Informing our manager when we want to start an additional activity and obtaining the necessary permissions from the personnel unit (such as undertaking a task in another company, operating for another company, carrying out a commercial activity of our own);
- To inform our manager when we have taken on a voluntary assignment (e.g. judge, administrative member, activity manager, etc.) in order to prevent the occurrence of a conflict in relation to the duties arising from our employment contract.

9 compliance with export control and customs requirements.

Reduction of free movement of goods

INTRON is a globally operating company that must take into account the regulations limiting the free movement of products within the scope of its commercial activities all over the world. Various national and international laws or embargoes limit and prohibit the import, export or trade of products and technology or services within the country and the flow of capital and payments. These limitations and prohibitions may arise from the nature of the product, the country of origin or use, or the trading partner itself.

INTRON has also taken serious measures to combat contraband. Each INTRON company and its employees are obliged to comply with the relevant requirements arising from the customs law in both import and export business.

Violation of the specified requirements may seriously adversely affect the reputation of the entire group of companies and may have incalculable consequences, except for the consequences that may arise for the relevant business unit.

How do we behave correctly?

To act correctly...

- To ensure that the necessary controls are carried out by the relevant experts regarding whether there are any restrictions or prohibitions in the purchase, sale or intermediation of goods and services and technology transfers.
- obtain the requested official permits when necessary before carrying out the relevant trade;
- to control and act in accordance with the requirements of the relevant customs law in import and export affairs.

Detailed information about these rules can be found in the company rules on export control.

10 occupational health and safety.

Safety at work

Safety in the workplace and the protection of the health of all employees is a fundamental principle for INTRON , which has a deep-rooted place in the corporate culture. For this reason, each INTRON unit is obliged to take the necessary precautions related to accident prevention and occupational health necessary for its own field of work and to shape the work within the scope of humanitarian frameworks.

Within the scope of occupational safety and health, we also include supporting our employees before and during their business trips. Each manager is responsible for the protection of his own employees and is obliged to inform, train and supervise his employees.

How do we behave correctly?

To act correctly...

- comply with safety instructions (e.g. when working with hazardous substances);
- to develop in a hazard-conscious manner and to contribute to safety-related activities;
- to act cautiously so that situations that endanger security do not occur at all.
- eliminate the dangerous situation.
- to immediately notify the relevant manager of the detected accidents or the foreseeable hazards and their onsets.
- to conclude the issue of travel safety in advance of business travel;
- to take advantage of the preventive measures offered by the company.

You can find details about these rules in the company rules on occupational safety.

11 product safety.

Quality

In addition to their performance, the safety and reliability of our products are decisive for our success. Product safety starts with development, accompanies the procurement and production processes and is a very important factor in relation to the installation and service activities of our products at our customers.

Ensuring product safety serves a number of legal requirements related to the development, production, approval and sale of our products. INTRON products must not compromise the safety and health of users and must meet certain quality specifications.

Defective products can cause major damages, and these damages can adversely affect not only the company (e.g., recall actions, reputation), but the user himself.

How do we behave correctly?

To act correctly...

- comply with quality requirements.
- obtain all necessary permissions for the provision of these products;
- to inform our customers when we are informed about the hazards arising from our products and to realize them by offering the necessary solution suggestions.

12 Environment Management and efficient use of energy.

Energy efficiency

Our company considers the protection of the environment as an indispensable task for the company and considers the production of our products in a resource-saving and energy-efficient manner as an important production factor.

In terms of protecting the environment and using energy efficiently, the following personal

Responsibilities include:

- An environmentally protective approach and the efficient use of all resources, including energy, regulated recycling and disposal, is an obligation for our operations. In this way, we prevent or minimize the burdens on people, the environment and nature, and continuously improve energy-related performance.
- During the development and design, production process, packaging, and shipment of our products, we take into account the conditions necessary for a good environment and attach great importance to these aspects in improving operations and commissioning new plants and products.
- Our main goal is to achieve the greatest possible efficiency during the use of resources – by ensuring a sustainable economy.

Violation of environmental regulations not only harms people and nature but can also permanently damage the success of our company (e.g., loss of reputation, due to penalties).

How do we behave correctly?

To act correctly...

- Carefully use resources (e.g., water, paper, electricity), dispose of and reuse them in accordance with the rules.
- To consider the measures related to environmental protection and energy efficiency in all value-added and production processes.
- To act with environmental awareness in the disposal of wastes. To prevent environmental damages by reporting environmental risks.
- To notify the experts within the company who will immediately make the legally required notifications to the official units in case of environmental damages that have arisen. You can find detailed information about this in the company rules for environmental protection.

13 protection of personal data.

Data protection

The easier and more comprehensive the digital processing of data becomes, the more important it is to protect the personal data of our customers, business partners and employees (e.g. name, address, date of birth, tax number, information about health status).

Such personal data may only be transferred and processed under applicable law. Violation of data protection regulations requires the imposition of high penalties.

How do we behave correctly?

To act correctly...

- provide us with an overview to understand how much of the personal information we may use;
- inform the data security officer about how the personal information will be used;
- protect personal data from unauthorized access (e.g. applying the necessary security standards to electronic communications with third parties);
- receive, save or transfer personal data only when it is necessary for the performance of a task and where permitted by law;
- destroy documents containing personal data in a safe and controlled manner;
- call your data protection officer or administrator where necessary.

You can find detailed information about this in the company rules on the protection of personal data.

14 Financial integrity and the fight against money laundering.

Money transactions

All business activities need to be regularly stated in the accounting records, balance sheets and tax statement. For this, all transactions must be recorded properly and completely, and they must be documented and archived in a reproducible manner. Any act contrary to these carries with it the danger of being subjected to investigations, paperwork problems, fraud accusations, tax penalties or money laundering accusations due to balance sheet manipulations.

Money laundering means that the origin of illegally obtained money (e.g., terrorism, drug trafficking, blackmail, or other criminal offences) is covered up by pouring it into legal trade so that it is shown to have been acquired in accordance with the law. One of the declared objectives of INTRON is not to use or contribute to money laundering or other illegal purposes of any other kind of behavior.

How do we behave correctly?

To act correctly...

- comply with billing rules.
- not to perform any work outside of normal processes.
- properly archive all kinds of documents related to the company's business.
- to comply with statutory retention obligations.
- not to alter and destroy documents relating to official reviews or civil cases under private law randomly and thoughtlessly.
- failing to complete work where hints of money laundering are concerned, and in each suspicious case, discuss the situation with the relevant manager or competent compliance officer.

15 Authorized persons for behavior and direction in suspicious situations.

Ask or text.

Each employee is expected to request advice and assistance from managers, authorized specialist departments, employee representatives or the compliance organization in case of legal concerns about his/her behavior or in case of signs that legally suspicious transactions have been carried out in the work environment.

A list of all compliance authorities and detailed alerts can be found within the internal network under Compliance. All claims are taken seriously and the person giving the relevant report will not take disciplinary measures or penalties, even if the misconduct in question cannot be proven. However, there is no tolerance for consciously making false or malicious accusations to harm others.

It is also possible to issue alerts anonymously. If the person issuing the warning requests confidentiality, this request is met.

How do we behave correctly?

To act correctly...

- be courageous and question in suspicious circumstances or warn of anticipated misconduct;
- Communicate your concerns to the local unit or, if these are not addressed locally, at the local or global level in the compliance organization located above it.

16 Special responsibility of managers.

Model by example

The company's senior executives and administrative supervisors at all levels have a great responsibility to comply with the set of codes of conduct.

These people

- be an example,
- ensure that its employees know, understand and comply with the requirements of the set of codes of conduct,
- to carry out training and information for its employees,
- guarantee the health and safety of its employees in daily working life
- ensure strict compliance with the set of codes of conduct and, where necessary, intervene with corrective and disciplinary measures,
- they are expected to be an accessible authority for employees and to support them by examining warnings about erroneous behavior.

Founder

Serhat Demirkol

ceo

Ayhan Aksoy