

EBEBEK MAĞAZACILIK ANONİM ŞİRKETİ CODE OF CONDUCT AND ETHICAL PRINCIPLES

The ebebek Code of Conduct and Ethical Principles has been established with the aim of regulating our relations with employees, barents, business partners, and other stakeholders, enhancing our service quality, and ensuring the effective and sustainable use of our resources. The ebebek Code of Conduct and Ethical Principles serves to foster a common corporate culture and constitutes a set of rules that all our employees are required to comply with.

CODE OF CONDUCT:

- We are aware that our most valuable assets are our barents, our employees, and our products.
- We determine our product range by taking into account the needs and demands of our barents, offering a wide product variety.
- We pay close attention to our expenses and costs to ensure that our barents can shop at affordable prices.
- We make every effort to understand the deep emotions our barents feel toward their babies and respect their concerns and anxieties during this process.
- We listen carefully to the feedback of our barents, learn from them about our shortcomings, and provide prompt solutions.
- We continue to provide superior after-sales service to our barents.
- We position our stores by taking into account the easy accessibility of our barents.
- Our organization is lean, simple, and strong.
- We base our decisions on realistic data. We value statistics and believe that only what can be measured can be improved.
- We make use of the most up-to-date technologies to manage our organization in the healthiest way and to make the right decisions on time.
- ebebek is a continuously learning organization.
- Mistakes enhance our experience. We learn from our mistakes and prevent their recurrence.
- We work with team spirit and value fast and high-quality service.
- We participate in every stage of the work and always support one another.
- We also place importance on celebrating success, creating a happy working environment, and recognizing achievements.
- We attach importance to the training of our employees, believing that the investment we make in them is essential for the future success of our organization.

- For the sustainable growth of our organization, each of our employees trains their successor and passes on their knowledge. The most important quality of our managers is to develop teammates who can take over their positions.
- Our managers aim to simplify work and workflows, make them understandable and applicable, and increase the number of achievers.
- Our employees have job descriptions that clearly define their duties and responsibilities.
- We turn all significant business processes into procedures and implement them consistently within the same framework.

ETHICAL PRINCIPLES:

1. Integrity and Reliability

At ebebek, we never lie under any circumstances while performing our duties, and we act with sincerity and honesty.

2. Anti-Bribery and Anti-Corruption

We categorically reject bribery and corruption. Bribery includes offering, promising, or giving money or any other item of value to government officials, public officers, suppliers or supplier candidates, or any third party directly or indirectly related to ebebek's business activities, in order to influence their decisions, as well as any ebebek employee's acceptance of money, valuable items, or related promises from such parties.

3. Conflict of Interest

- We avoid situations that may compromise our impartiality in decisions taken due to our authority and responsibilities at ebebek. If we encounter situations where our personal or family interests may conflict with the interests of ebebek, we inform our manager and act in line with decisions that best serve the Company's interest.
- To ensure impartiality, spouses are not permitted to work at ebebek simultaneously.

4. Compliance with Legislation

We act in accordance with human rights and the law while conducting our activities. In cases where legislation is not sufficiently clear or where we lack adequate knowledge, we seek clarification and consult our manager or competent authorities before acting.

5. Relations with Competitors and Fair Competition

- We comply with the rules of fair competition as well as all applicable laws and legal regulations governing such matters. We avoid any conduct that may distort, obstruct, or restrict competition.
- Regardless of their size, we respect every competitor and value their contributions to our sector. We refrain from making negative remarks about our competitors.

6. Relations with Our Barents

- We are meticulous in selecting our products. Items that we would not choose for our own children are not placed on our shelves or offered on our website.
- We act with the intention of informing and guiding our parents, rather than being driven solely by sales concerns.

7. Relations with Our Employees and Organization

- Every individual within our organization is valuable to us. We respect and value all members of our organization regardless of title or seniority, and we conduct ourselves in accordance with the principles of courtesy and respect.
- We evaluate our employees' performance objectively, taking into account their efforts, dedication, and achievements. In recruitment, promotion, and assignments, we prioritize competence and ensure equal opportunities among employees.
- Everyone in our organization contributes to our success and should do so. We include our employees in decision-making processes, as we believe the most innovative ideas and solutions come from ebebek employees.
- We respect our employees' right to a healthy life. We provide safe, healthy, and clean working environments. All workplaces are operated in compliance with occupational health and safety legislation. ebebek employees report unsafe working conditions or additional measures needed for occupational health and safety to their managers or via the ethics reporting channel.
- We place great importance on human health. For this reason, our team consists of individuals who do not smoke, even in their private lives.

8. Relations with Our Business Partners

- We recognize our suppliers as business partners and believe that growth can only be achieved together. We value our relationship with them even during periods when we are not engaged in trade.
- We evaluate suggestions and complaints received from our business partners.
- We attach the same level of importance to the confidentiality of our business partners' commercial information as we do to our own.
- We make every effort to engage only with parties who respect human rights, comply with all areas of law, uphold anti-bribery and anti-corruption principles, and prioritize occupational health and safety.

9. Hissedarlarımızla İlişkiler

- We strive to ensure that our shareholders experience the satisfaction of having invested in a company that is valuable, respected by society, and prioritizes providing quality service.
- We aim to deliver sustainable growth and profitability.

10. Environment and Sustainability

- We ensure that our products and services do not cause negative impacts on the environment.
- We actively play a role in raising awareness for a sustainable world and contribute through efficiency, recycling, and reuse projects.
- We use all our resources in line with business purposes. Protecting Company resources, using them efficiently, and avoiding waste are the responsibility of all our employees.

11. Confidentiality and Protection of Inside Information

- We place great importance on the confidentiality of all information obtained during or as a result of our work, and we use such information solely for the purpose of performing our duties. Even after leaving the Company, we do not violate confidentiality principles.
- We acknowledge that conducting capital market transactions based on material non-public information (“inside information”) that could influence investor decisions constitutes a criminal offense, and we strictly avoid such actions. We take all necessary measures to safeguard inside information.
- We ensure the confidentiality and security of the personal data of our barents (customers), employees, and business partners, and we act in compliance with applicable legislation and Company procedures governing the use of such data.

12. Giving and Accepting Gifts, Hospitality

- We act in accordance with our Gift Giving, Gift Acceptance, and Hospitality Policy in matters concerning gifts and hospitality.
- We neither give nor accept cash or cash-equivalent gifts.
- We do not accept offers unrelated to our business, directed at ourselves or our relatives, or exceeding reasonable value—such as hospitality, event participation, memberships, or promises of employment; nor do we extend such offers or gifts to those with whom we have business relations, including public officials.
- Employees may only accept or give gifts that are customary in commercial practice, of reasonable value, occasional in nature, and not of a kind that could influence the decisions they make in the course of their duties.

13. Advertising, Media Relations, and Social Media Use

- In our sales and marketing activities, we do not engage in misleading or deceptive advertising, nor do we make false statements. Our advertisements and social media posts do not discriminate based on gender, religion, language, or race, and they do not contain humiliating or violent elements.
- We maintain equal distance from all media organizations and establish equal relationships with them. We provide honest and reliable information to the media.

- We recognize that employees' social media accounts are part of their private lives, but we expect them to avoid posts that may create the impression they are expressing views on behalf of ebebek.

14. Donations and Sponsorships

We make donations and sponsor events with a sense of social responsibility and in alignment with ebebek's corporate culture. When making donation and sponsorship decisions, we prioritize supporting and protecting mothers, babies, children, and persons with disabilities; combating the consequences of natural disasters; ensuring equal opportunities in education; and protecting nature. We do not provide donations or sponsorships to political campaigns or activities, nor do we engage in political actions on behalf of our organization.

15. Reporting Non-Compliance and Concerns

- We value and encourage the reporting of non-compliance with, or suspicions of non-compliance with, the ebebek Code of Ethics. Even if an issue is outside our own area of responsibility, we do not ignore it and take action to resolve it.
- All managers are responsible for monitoring whether their subordinates and the business partners with whom they interact on behalf of the Company act in compliance with the ebebek Code of Ethics.
- Reports of violations or suspected violations of the ebebek Code of Ethics must be made through the ethics reporting channel at etik@ebebek.com.
- It is the responsibility of the employee who identifies a violation or a suspected violation to report it immediately to the ethics reporting channel. Managers are likewise obliged to forward all reports they receive, including verbal notifications, without delay to the ethics reporting channel.
- If requested, the identity of the reporting person will be kept confidential. Any preliminary review, and if necessary, any internal investigation resulting from the report, will be conducted under strict confidentiality.
- The reporting person must respect the personal rights of the individual accused.
- Employees who knowingly make false or misleading reports will be subject to disciplinary procedures.

16. Ethics Council

- The Ethics Council is authorized and responsible for evaluating and concluding reports and concerns submitted through the ethics reporting channel or other methods. Where deemed necessary, the Council may decide to obtain consultancy services to conduct the internal investigation.
- The Ethics Council decides whether or not to initiate an internal investigation following a report. If an internal investigation is initiated, the Council instructs the Internal

Control, Risk Management, and Internal Audit Directorate to carry it out and takes the necessary decisions after reviewing the investigation report prepared by the Directorate.

- The Ethics Council is composed of the General Manager, the Human Resources Director, and the Internal Control, Risk Management & Internal Audit Director. Depending on the seriousness of the case and the position of the person or persons concerned, the Group CEO may also be invited to participate in the Ethics Council.
- In order to safeguard the independence of the investigation, the manager of the department related to the reported case may not participate in the decisions of the Ethics Council regarding that report.
- The Ethics Council takes all necessary measures to ensure that reports are reviewed and investigated confidentially and that the rights of the person accused are not violated during the process.

17. Evaluation of Reports and Internal Investigation

- Reports submitted through the Ethics Code reporting channel or other means are initially received by the Internal Control, Risk Management, and Internal Audit Directorate. Following a preliminary review, the Directorate prepares a report including its opinion on whether the matter falls within the scope of the ebebek Code of Ethics and whether an internal investigation is required, and submits this preliminary report to the Ethics Council.
- If, after reviewing the preliminary report, the Ethics Council decides to initiate an internal investigation, the investigation is carried out by the Internal Control, Risk Management, and Internal Audit Directorate. Unless otherwise decided by the Ethics Council, the relevant director is informed of the matter. In its decision to initiate an investigation, the Ethics Council also sets a reasonable deadline for completion of the investigation report.
- During the internal investigation, the Internal Control, Risk Management, and Internal Audit Directorate has the authority to request all information and documents related to the investigation from any department of the Company. The Directorate submits the internal investigation report to the Ethics Council in writing upon completion.
- The Ethics Council reviews the investigation report. Unless it deems it necessary to request an expanded investigation from the Internal Control, Risk Management, and Internal Audit Directorate, the Council finalizes the process by taking necessary actions, which may include initiating disciplinary procedures against those involved, filing a complaint or notification with the Public Prosecutor's Office, or initiating legal proceedings.