CNC-TURKEY

INTEGRITY / CONFIDENTIALITY / QUALITY

CODE OF BUSINESS CONDUCT & ETHICS

Responsible Business

CNCTURKEY TEKNOLOJİ SANAYİ VE DIŞ TİCARET LİMİTED ŞİRKETİ

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DOCUMENT GUIDE

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MANAGEMENT & SCOPE

1. Message from Management

At CNC-TURKEY, we believe that successful business relationships are built on trust, integrity, technical competence, and mutual respect.

CNC-TURKEY manages CNC component manufacturing projects from technical evaluation and process planning through quality documentation and delivery coordination. We work with specialist business partners for processes including material supply, heat treatment, coating and grinding. We understand that our responsibility extends beyond commercial transactions to protecting customer information, promoting responsible sourcing, and maintaining transparent business practices.

We are committed to conducting our business ethically, respecting applicable laws, and continuously improving the way we work with customers, suppliers, and other stakeholders.

This Code of Business Conduct & Ethics defines the principles that guide our decisions and professional relationships.

Gökhan Doğruyol
Managing Director
CNC-TURKEY

2. Purpose and Scope

This Code establishes the fundamental ethical principles and professional standards of CNC-TURKEY.

It applies to company management, employees, and individuals acting on behalf of CNC-TURKEY.

We also expect our suppliers, subcontractors, and business partners to respect the principles relevant to their business relationships with us.

Our objective is to promote lawful, responsible, fair, and transparent business practices throughout our operations.

DIRECTION & INTEGRITY

3. Our Mission, Vision and Values

Our Mission

To provide reliable, competitive, and technically sound CNC component solutions by managing technical evaluation, manufacturing processes, industrial supply requirements, quality documentation and delivery coordination for international customers.

Our Vision

To become a trusted international partner for industrial manufacturing solutions, combining manufacturing expertise, coordinated industrial processes, and digital technologies.

Our Core Values

Integrity: We conduct business honestly and communicate transparently.

Reliability: We take our commitments seriously and maintain responsible business relationships.

Confidentiality: We protect the technical and commercial information entrusted to us.

Quality: We promote conformity with agreed technical specifications and customer requirements.

Collaboration: We value long-term cooperation with customers and business partners.

Innovation: We support digital transformation and continuous improvement in industrial operations.

4. Business Integrity and Fair Competition

CNC-TURKEY is committed to fair and lawful competition.

We do not participate in price fixing, bid rigging, unlawful market allocation, or other anti-competitive practices.

Our commercial decisions are based on legitimate business considerations, including technical capability, quality requirements, delivery expectations, commercial conditions, and supplier performance.

We strive to provide accurate information in quotations, commercial communications, and contractual documentation.

CONFIDENTIALITY & INTELLECTUAL PROPERTY

5. Customer Confidentiality and Intellectual Property

Protecting customer information is a fundamental responsibility of CNC-TURKEY.

Confidential information may include:

- Technical drawings, CAD files, 3D models, and manufacturing specifications.
- Product designs, prototypes, and engineering documentation.
- Customer identities, supplier information, and business relationships.
- Commercial quotations, pricing structures, and contractual conditions.
- Manufacturing methods and proprietary technical information.

Confidential information must not be disclosed to unauthorized parties.

Where sharing technical information with authorized business partners is necessary for quotation or production purposes, CNC-TURKEY seeks to limit disclosure to the information reasonably required and to apply appropriate confidentiality safeguards.

Customer-owned intellectual property must not be copied, published, sold, or used for unauthorized purposes.

We respect contractual confidentiality obligations, including applicable Non-Disclosure Agreements (NDAs).

SUPPLIER RELATIONS & RESPONSIBLE SOURCING

6. Supplier Relations and Responsible Sourcing

CNC-TURKEY selects suppliers and specialist business partners according to specific technical and commercial requirements. These relationships may support material supply, heat treatment, coating, grinding and other project requirements.

Relevant considerations may include machining capability, manufacturing experience, material availability, delivery capacity, quality expectations, and commercial competitiveness.

We promote responsible sourcing and expect suppliers to:

- Comply with applicable laws and regulations.
- Respect confidentiality and intellectual property rights.
- Provide accurate information about materials, production processes, and product conformity.
- Avoid bribery, fraud, and unethical business practices.
- Maintain safe working conditions and respect fundamental labor rights.
- Notify CNC-TURKEY of significant issues affecting agreed product requirements.

The use of subcontractors or alternative production sources must remain consistent with applicable contractual and confidentiality requirements.

QUALITY & PRODUCT CONFORMITY

7. Product Quality, Traceability and Documentation

We recognize the importance of quality, dimensional conformity, and reliable technical documentation in industrial manufacturing.

CNC-TURKEY promotes manufacturing and sourcing practices aligned with agreed customer specifications.

Depending on the project and contractual requirements, relevant documentation may include:

- Material certificates and declarations.
- Dimensional inspection reports.
- Surface treatment and heat treatment records.
- Product identification and traceability information.
- Customer-specific compliance documentation.

Technical documentation must be accurate and must not be falsified or knowingly misrepresented.

Any significant deviation from agreed specifications must be addressed through appropriate communication and agreement with the customer.

PEOPLE & ETHICAL DECISIONS

8. Anti-Bribery, Corruption and Conflicts of Interest

CNC-TURKEY does not tolerate bribery, corruption, fraud, or improper payments.

Employees and representatives must not offer, request, or accept improper benefits intended to influence commercial decisions.

Gifts and business hospitality must remain reasonable, lawful, and appropriate to the business relationship.

Personal or financial interests that could improperly influence business decisions must be disclosed to company management.

We encourage objective supplier selection and fair treatment of business partners.

9. Human Rights, Respect and Workplace Safety

CNC-TURKEY supports respectful, fair, and safe working environments.

We oppose discrimination, harassment, forced labor, child labor, and workplace violence.

All individuals should be treated with dignity, regardless of their personal background or legally protected characteristics.

We expect business partners and suppliers to comply with applicable employment and occupational health and safety requirements.

Workplace safety concerns should be communicated promptly to the responsible parties.

ENVIRONMENT & INTERNATIONAL TRADE

10. Environmental Responsibility

CNC-TURKEY recognizes the importance of environmental responsibility in industrial activities.

We support compliance with applicable environmental regulations and encourage efficient use of materials, energy, and resources.

Where relevant to the manufacturing process, we encourage responsible management of machining waste, cutting fluids, chemicals, surface treatment residues, and recyclable materials.

We seek to promote continuous improvement and environmentally responsible practices throughout our business relationships.

11. International Trade and Export Compliance

As a company engaged in international trade, CNC-TURKEY recognizes the importance of compliance with applicable customs, export control, and trade regulations.

We are committed to conducting international transactions in accordance with applicable legal requirements, including relevant sanctions and restrictions.

Where necessary, transactions, customers, destinations, and products must be assessed against applicable trade compliance requirements.

Commercial invoices, declarations, shipping documents, and product information must accurately reflect the underlying transactions.

RECORDS & INFORMATION

12. Financial Integrity and Record Keeping

CNC-TURKEY is committed to maintaining accurate business and financial records.

Invoices, purchase orders, commercial agreements, and related documentation must reflect legitimate business transactions.

Company records must be maintained and retained in accordance with applicable legal requirements.

Fraudulent accounting, deliberate falsification, and misleading commercial records are unacceptable.

13. Data Protection and Information Security

CNC-TURKEY respects the privacy of customers, suppliers, employees, and business partners.

Personal and business information must be handled responsibly and in accordance with applicable data protection legislation, including the Turkish Personal Data Protection Law (KVKK) and, where applicable, the European Union General Data Protection Regulation (GDPR).

Access to sensitive information should be limited to authorized persons with a legitimate business need.

Appropriate safeguards should be used to protect digital information, technical documents, and business records against unauthorized access, loss, or disclosure.

ACCOUNTABILITY & COMMITMENT

14. Implementation, Reporting and Accountability

CNC-TURKEY management is responsible for promoting and overseeing the implementation of this Code.

Employees and representatives are expected to act consistently with these principles and raise concerns when potential violations are identified.

Customers, suppliers, and other business partners may communicate concerns regarding ethical conduct through:

info@cnc-turkey.com

Reported concerns will be reviewed responsibly and handled with appropriate discretion.

Violations may result in corrective measures or other actions consistent with applicable laws and contractual obligations.

Management Commitment

CNC-TURKEY is committed to maintaining ethical business standards and building lasting relationships based on integrity, reliability, technical competence, and mutual trust.

This Code reflects our commitment to responsible business conduct and serves as a foundation for continuous improvement.

For and on behalf of CNC-TURKEY

Gökhan Doğruyol
Managing Director

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