

AKKÖK GROUP OF COMPANIES  
**CODE OF BUSINESS ETHICS**

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Guidelines for Uncertain/Doubtful Situations



Akkök Group of Companies considers adherence to our Code of Business Ethics as a prerequisite in all business processes and relationships and sees it as one of the cornerstones of its corporate culture. Since its establishment, Akkök Group of Companies has stood up to the highest standards, acting with a sense of responsibility towards the society in all business processes and relationships and holding onto integrity as a fundamental value.

Our corporate culture is based on the principles of responsibility, integrity, trust, equality, privacy and legal compliance, i.e. main principles that we adhere to in our relations with employees, partners, suppliers, customers, dealers, other stakeholders and the public. Acting according to these principles means, beyond its implications in terms of reputation and legal compliance, that we have a working environment that is based on mutual respect and cooperation.

Our long-standing policies and values have now been brought together under this Code of Business Ethics to supplement our institutionalization process. We believe that our Code of Business Ethics, which is intended to introduce a certain set of behavior that will be reflected in all our stakeholder relations, will guide us in every aspect of our operations.

Akkök's culture is our greatest legacy that will pass on to future generations, and we wholeheartedly believe that you will show the same level of commitment as us to our Code of Business Ethics to ensure that it uphold by all employees within the Group.

Kind regards,

**Gökşin Durusoy**

Akkök Group of Companies  
Chief Executive Officer



## Our Code of Business Ethics >>>>>

### **We are Dedicated to our Code of Business Ethics**

It is neither possible nor practical to explain, in Akkök Group of Companies Code of Business Ethics ("Code of Business Ethics"), all possible situations that our employees may encounter while performing their duties. In some situations, we may need to use our best judgment to select and follow the most appropriate behavior. If you have any questions, you can contact the Akkök Group of Companies Ethics Committee ("Ethics Committee") through your managers, Ethics Representative or Akkök Group of Companies Ethics Hotline ("Ethics Hotline").

### **What is our Code of Business Ethics?**

Our Code of Business Ethics is a consolidated summary of the Group's long-standing practices, combining the principles of personal conduct and rules of business ethics in a single document. The Code of Business Ethics sets out the standards for responsible behavior and provides guidance on how to handle important ethical matters.

### **Why is our Code of Business Ethics Important?**

We all want to do what is right for ourselves and for the Group. Akkök Group of Companies Code of Business Ethics provides guidance for us in this area. The Code of Business Ethics offers a framework that defines how we should behave as representatives of our Group and addresses our responsibilities towards all stakeholders. We all need to comply with the laws, the Code of Business Ethics and our Group's internal regulations, and take responsibility for our every action.

### **Does Our Code of Business Ethics Include Everything That We Need to Know?**

It is neither possible nor practical to explain, in the Code of Business Ethics ("Code of Business Ethics"), all possible situations that our employees may encounter while performing their duties. In some situations, we may need to use our best judgment to select and follow the most appropriate behavior. In such situations, for any question about the Code of Business Ethics, we can contact our managers, human resources department and our company's ethics representative. We can also contact the Ethics Committee, whether directly or via the Ethics Hotline as described below.

### **Who Must Comply With our Code of Business Ethics?**

As employees of Akkök Group of Companies, we are all responsible for complying with this Code of Business Ethics, related supplementary policies, any applicable law and regulation as well as all specific policies and regulations drafted by our respective company within the Group. We also hold our teams and colleagues accountable for compliance with them. Managers are responsible for communicating this Code of Business Ethics to the employee they work with ensuring that they understand and comply with the Code of Business Ethics, and creating an environment where employees can freely discuss ethical and legal matters. In addition, managers provide guidance on how to follow prescribed principles and policies, set a personal example to promote compliance with the Code of Business Ethics principles, ensure that team members receive appropriate training and guidance to comply with the Code of Business Ethics, listen to concerns and support those who raise such concerns.

### **What to Do in Case of Any Doubt about Violation of our Code of Business Ethics?**

We report any suspected violation of the laws, the Code of Business Ethics and related supplementary policies to the authorized people and departments as soon as possible. We can notify first our managers, human resources department and our company's ethics representative about our suspicions. Alternatively, we can also contact the Ethics Committee, whether directly or via the Ethics Hotline as described below, without any fear of retaliation. To find the best course of action to take when you are not sure how to proceed, please refer to the following section of this booklet: "Guidelines for Uncertain/Doubtful Situations".

# How does Akkök Group of Companies Ethics Hotline Work? >>>>

## Purposes of the Ethics Hotline:

- to clarify, and offer recommendations on, how to implement the Code of Business Ethics in certain situations.
- to provide an alternative channel of communication for reporting any suspected violation of the laws, the Code of Business Ethics and related supplementary policies



## Akkök Group of Companies Ethics Hotline:

The hotline is available from 08:30 to 17:30 on weekdays and is operated by an independent, specialized organization. This independent organization may disclose the identification details of any whistleblower with the Ethics Committee only if prior permission is obtained from that person.

We can reach the Ethics Committee via the Ethics Hotline at 0850 202 66 15 from 08:30 to 17:30 on weekdays, or via the web portal, mail or e-mail by using the contact information below.



## Contact:

Miralay Şefik Bey Sokak Akhan No:15  
34437 Gumussuyu Istanbul/Turkey



akkokethics@kpmg.com

www.akkokethics.com

# Ethics Hotline Reports

## How Will Our Reports to the Ethics Hotline Be Handled?

Akkök Group of Companies Management will support us if we report an evidently inappropriate behavior in good faith and honestly. During subsequent investigation of a possible violation of the Code of Business Ethics, no action will be taken against those reporting it, participating in, or assisting with, the investigation (except in cases where the report itself or the information provided is deliberately misrepresented).

The Ethics Committee will keep our identity and the information we provide confidential, unless disclosure of such information is legally required or is needed to carry out the investigation in an effective manner.

Reports should clearly describe the details of any alleged violation of the Code of Business Ethics. Sufficient details should be provided to describe who caused the violation and when and where it occurred. All kinds of supporting documentation available should be submitted, and witnesses and other evidence should be pointed out. All reported violations will be investigated as soon as possible.

Investigations are carried out in a thorough and fair manner and in accordance with the Code of Business Ethics, legal regulations and human rights. Failure to comply with the Code of Business Ethics and supplementary policies or legal and regulatory requirements may result in appropriate disciplinary action, including termination of employment. This also applies equally to anyone who ignores violations or fails to identify/correct them. The responsibility for imposing appropriate disciplinary penalties in accordance with the disciplinary rules, to the extent permitted by the Labor Law, lies with the management of the respective company.

## No Retaliation

During subsequent investigation of a possible violation of the Code of Business Ethics, no action is taken against those reporting it, participating in, or assisting with, the investigation (except in cases where the report itself or the information provided is deliberately misrepresented).

Akkök Group of Companies Ethics Committee keeps all reports confidential.



# Our Fundamental Values as Akkök Group of Companies

## Our Fundamental Values: Honesty, trust and respect

We communicate honestly and openly with our colleagues, customers, suppliers, business partners and all other stakeholders. We always seek the truth and act with integrity. Honesty is one of our most important values. We establish a form of communication and behavior that is based on trust and mutual respect with all people and organizations with which we have business relationships.

# Our Responsibilities as Akkök Group of Companies

## Responsibility towards our Customers

We value being a customer-oriented group of companies. We communicate in a consistent, fair and attentive manner with our customers. We look after our customers' needs. We process and protect our customers' personal and confidential data in accordance with the applicable laws. We never provide false, incomplete or inconsistent information to our customers. We always keep the safety and quality of our services and products at the highest level.

## Responsibility towards our Suppliers

We evaluate our suppliers in a fair, equal and impartial manner. We treat our suppliers according to our Code of Business Ethics and process and protect their personal and confidential information in accordance with the applicable laws.

## Responsibility towards our Competitors

We compete with our competitors fairly and in accordance with the laws. We collect information about our competitors through ethical and legal ways. We comply with the competition laws and antitrust regulations.



## Responsibility towards the Environment

We protect our environment and natural resources while carrying out our activities. Akkök Holding A.S. has undersigned the United Nations Global Compact as per its commitment to sustainable growth and social responsibility.

We make every effort to minimize our environmental impact and consume ethically. We fight against the climate change. We prioritize energy and resource efficiency at every stage of our projects.

## Responsibility towards our Employees

As Akkök Group of Companies, we can achieve great success only if we collaborate and support each other at all levels. It is clear that such collaboration requires an environment that is based on trust, open and honest communication, and respect. Therefore, it is important that we maintain all our relationships with our colleagues, those we manage and our managers. With an awareness of responsibility, shared ethical values and a level of commitment that prioritizes the success of our group.

## Responsibility towards Each Other

Akkök Group of Companies is responsible for providing a healthy and safe working environment for its employees. Akkök Group of Companies is committed to respect the privacy of its employees' personal information (such as personal records, photographs and home addresses).

It is essential to create a working environment across our Group that supports collaboration, is based on mutual respect, is free from harassment and unprofessional behavior, and provides equal opportunities without discrimination. Each employee is personally responsible towards other employees and Akkök Group of Companies for eliminating behaviors and events that are detrimental to this environment.

## Opposing Harassment and Physical Violence

We all have the right to respect and human dignity. At Akkök Group of Companies, this principle forms the basis of how we conduct our business. Any behavior or action that may violate this right, prevent us from feeling valued or cause anxiety, including especially any form of harassment or physical violence, is not acceptable.

- We do not engage in sexual harassment.
- We do not intimidate or humiliate. We do not engage in any behavior that could make another person feel threatened or unsafe, including verbal assaults, threats and any form of hostility, intimidation or aggression.
- We do not exhibit derogatory, disparaging, humiliating or intimidating behavior towards each other and the parties we do business with.
- We do not display negative behavior towards any person who files a complaint or report about any harassment or assist during the investigation.

## Promoting Equal Opportunity

As employees of Akkök Group of Companies, we are entitled to treat equal and fair treatment without discrimination.

- We keep our beliefs and political views strictly separate from our work environment, duties and responsibilities.
- We do not discriminate, but rather treat everyone in an equal and fair manner.
- We receive equal employment and development opportunities regardless of language, race, color, nationality, gender, age, sexual orientation, physical disability or other characteristics protected under the law.

## Upholding a Healthy and Safe Working Environment

- We promote a sound culture of occupational health and safety.
- We combat unacceptable and potentially dangerous behavior.

## Respecting Privacy

We all have the right to personal privacy.

- We respect each other's private life and personal space.
- Please see Akkök Group of Companies Human Rights Policy for more details.

# Compliance with Laws and Regulations

## Compliance with Laws and Other Regulations

As Akkök Group of Companies, we comply with local and international legislation in all countries in which we operate as well as local and international initiatives, declarations, principles, guidelines and conventions to which the Republic of Turkey and Akkök Holding are parties.

In case any doubt over compliance, we seek the opinion of the legal department and follow its guidance. We take utmost care to comply with our commercial agreements with third parties.

## Compliance with Competition Rules

There are many laws and regulations that govern relations with competitors and protect their confidential information. In any case, it is essential that we collect competitive data ethically and in accordance with applicable regulations. Violation of competition rules may result in criminal sanctions for us as individuals and for our group.

We avoid any behavior that harms free and fair competition and adhere to legal and ethical competition rules. We support and encourage initiatives that serve a fair, competitive structure in business life.



When conducting business:

- We do not share commercially sensitive information, including customer and product information, with competitors.
- We try to access information about our competitors' businesses only through legal methods.
- We avoid methods that would cause unfair competition, such as driving competitors out of the market or preventing new competitors from entering the market.
- We avoid discussions that would harm fair competition or be perceived as such in meetings of associations, chambers and professional associations that we attend on behalf of our company.
- In case of any doubt, we notify our direct manager and the Legal Department.

### Accuracy of Financial and Commercial Records

Accuracy is the most important element for a successful business and is a fundamental part of that business's ability to continue its activities in a legal, honest and effective manner. Accurate record keeping and reporting will reflect positively on the Company's reputation and reliability and will enable the Company to fulfill its obligations under the laws and regulations.

We draw up and keep all kinds of reports, presentations, financial statements and footnotes to be disclosed to the public and submitted to competent authorities in a timely, complete, accurate, understandable and transparent manner in all material aspects and in accordance with the laws, legislation, our Group's internal regulations and Code of Business Ethics.

When conducting business:

- We put in our best effort to ensure that our financial and business records are accurate at all times.
- We keep records in a secure manner and comply with record retention policies.
- We collaborate with our internal and external auditors.
- We prepare our expense reports in a timely, complete and accurate manner.
- We do not issue misleading or fraudulent documents.

- We comply with tax regulations.
- In case of any issue with financial integrity, we don't keep it to ourselves.  
We evaluate such issues with our manager, finance manager or ethics representative.

### Anti-Money Laundering

Money laundering is the process of converting cash and funds derived from illicit activities, such as drug and human trafficking and corruption, to give them a legitimate appearance. While performing our operations, we take the necessary precautions to ensure that our processes and transactions are not used for money laundering. We comply with national and international laws and regulations on money laundering and financing of terrorism

## Integrity is the Basis of our Business

### Protecting Corporate Assets

The purpose of company resources is to help us achieve our business goals. Misuse or waste of company resources, including time, will result in a detrimental effect on both us and the financial and business performance of Akkök Group of Companies.

We are responsible for strengthening and protecting the name and reputation of our Group and using its resources efficiently. We avoid appearances, behaviors and actions that could harm this responsibility and put our group in a difficult situation. While performing our duties, we avoid waste and act responsibly to conserve assets.

Company assets include, but are not limited to, machinery, equipment, vehicles given to the use of employees by the company as well as all kinds of fixtures, raw materials and products, copyrights, patents, formulas, our working hours and all the resources we use to perform our job.



When conducting business:

- As a general rule, we avoid personal use of company assets. (Personal use of company communication equipment for is acceptable as long as it does not conflict with working hours and policies and is not continuous.)
- We show the necessary due diligence and common sense while performing our duties. We take into consideration the principles of profitability and efficiency. We avoid all actions and transactions that could cause the company to incur financial losses.
- We avoid inappropriate use of computer systems, corporate e-mail accounts and the internet, knowing that such use is subject to review when necessary.
- We use time effectively and efficiently during working hours.

### Anti-Bribery and Anti-Corruption

We comply with the U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA), the United Nations Global Compact, and the anti-bribery and anti-corruption laws and regulations of the countries in which we operate.

When conducting business:

- We don't, under any circumstances, give or offer cash or anything of monetary value that can be perceived as bribery to government officials and other third parties in order to gain an unfair commercial advantage. Likewise, we do not accept anything of monetary value that could put our group in a difficult situation.
- We do not make facilitating payments to expedite or secure a routine transaction or process.
- We do not offer any gift or hospitality to third parties and government officials with whom we have business relations, that may go beyond their intended purpose and wrongly influence the recipient's decision making.
- We make donations and give aid in accordance with our articles of association as well as our donation and aid policy.
- We submit our expenses along with supporting documents and necessary approvals. We do not falsify or alter any documents or accounting records.
- For details, please see the Akkök Group of Companies Anti-Bribery and Corruption Policy.

### Adherence to Gift and Hospitality Rules

We do not offer or accept any gift or hospitality that could put the Company in a difficult situation if it became known to the public, could violate applicable legislation or be seen as a bribe or kickback or result in preferential treatment in any business conduct. When giving or accepting gift or hospitality, as a "golden rule", evaluate whether a gift or hospitality is reasonable and how it could be perceived from the outside.

While conducting our business, we do not give or accept any lavish hospitality or gifts.

We never offer or accept cash or any cash-equivalent gifts, such as gift checks. We consider the following questions when giving and accepting gifts and hospitality:

- Is there a possibility that the gift I receive/give will affect my/recipient's impartiality and ability to make objective business decisions?
- If I offer that gift or hospitality, will it make the recipient feel obliged to do something?
- Will accepting a gift or hospitality put me in a difficult situation?
- Will it put me in a difficult situation if others find out that I received or gave a gift?

For details, please see the Akkök Group of Companies Gift and Hospitality Policy.

## Building Trust with Stakeholders ▶▶▶▶▶

### Protection of Confidential Information

Unauthorized disclosure and improper use of confidential information may hinder the operations of Akkök Group of Companies, negatively affect its operational and financial performance and damage its reputation. It is essential that all commercial and personal information regarding our companies, employees, customers and suppliers are kept private and confidential. We may have access to private and confidential information belonging to our Group, colleagues, customers and suppliers. We use such private and confidential information only to the extent it is required for the performance of our duties and in accordance with the law and legislation, and disclose it only to related authorities.



What is "Confidential Information"?

It includes, but not limited to:

- Customer information
- Trade secrets and know-how
- Strategic plans and business plans
- Financial information
- Information about suppliers
- R&D studies
- Personal information about personnel such as wages, benefits, training etc.
- All kinds of information regarding facilities and production. Information that could eliminate our competitive advantage
- Non-public information about our Group

We follow these principles regarding confidential information:

- We do not disclose confidential information to third parties unless it is required by public authorities and as per the legislation.
- We do not amend, copy or destroy confidential information. We take the necessary precautions to ensure that information is kept securely and not disclosed.



- We keep the passwords, user codes and other similar identifying information that are used to access information confidential and do not disclose them to anyone other than authorized users.
- We do not discuss confidential information in dining halls, cafeterias, elevators, staff transportation vehicles and other similar public places.
- We do not make false statements and / or spread rumours about people or organizations.
- Our salary, benefits and other similar personal information, which reflect the company policy and are private to us, are also confidential information and we do not disclose them to anyone other than the authorities, and we do not apply pressure on others to disclose them.
- For detail, please see Akkök Group of Companies Confidential Information Protection Policy.

### Avoiding Conflicts of Interest

A conflict of interest may arise when our personal activities or relationships affect, or appear to affect, our ability to act in the best interests of our Group. We avoid conflicts of interest. We carry out our duties in an accountable and transparent manner. We monitor and avoid situations where our personal interests may conflict with the interests of our Group. Doing business with relatives, including employment of family members, duties and activities outside the Company, individual investments, and special relationships with suppliers may create conflicts of interest.

As a general rule, we avoid conflicts of interest. If conflicts of interest cannot be avoided, we ensure that they are carefully managed. "Full disclosure" is a key element for managing conflicts of interest. Full disclosure allows for sound scrutiny. It may turn out that a seemingly suspicious transaction does not actually harm the Company.

We do not enter into any personal debt-credit relationship with parties who are directly or indirectly related to our job. We do not seek personal benefit from such individuals and organizations, and do not accept any benefits that they may offer. We avoid any action or behavior that could derive benefits for ourselves or our relatives by using the Company's name, resources, reputation or our position within the Company. We do not use any information that we obtain as part of our duties and authorities for the benefit of ourselves or our relatives.

We take the following questions into consideration:

- Would my colleagues or others think that the way I do business could be affected?
- Do I or anyone related to me gain any benefit from my relationship with the parties which my Company does business with?
- Could my decisions at the Company be influenced?
- Do I feel any obligation due to my relationships with the parties which my Company does business with?

- How would I feel if someone from Akkök Group of Companies found about this transaction?
- How would other customers or suppliers view the situation? Would they think that I am not acting impartially and fairly

If the answer to any of these questions is "yes" or "maybe," you may be violating our Code of Business Ethics. If you are unsure, you can consult your ethics representative or the Ethics Committee.

For more details, please see Akkök Group of Companies Conflict of Interest Policy.

### **We Do Not Trade Insider Information**

We do not use non-public commercial, operational, technical, financial or legal confidential information belonging to Akkök Group of Companies or our stakeholders which may affect the value of capital market instruments for the purpose of deriving benefits for ourselves or third parties. We understand that insider trading constitutes a violation of both our Code of Business Ethics and the laws.

Examples of insider information:

- Structural changes in partnership
- Changes in senior management
- Mergers and acquisitions
- New products to be released
- Important legal cases
- Financial information



# Guidelines for Uncertain / Doubtful Situations

In cases where we are unsure or in doubt, we proceed by asking ourselves the following questions:

### **Am I Facing an Ethical Issue?**

Have you received a request that you think is wrong? Do you think a friend is engaging in illicit or unethical behavior?

### **Should I Do Something About This?**

What is the issue that troubles you and how serious is it? How can you be sure about this? Why do you think there is an issue? Talk with a trusted colleague or manager and see what they think. Consult your human resources manager. Answer the questions below.

- Is it legal?
- Does it conform to our Code of Business Ethics?
- Can I disclose it to my family and friends?
- Would Akkök Group of Companies feel uncomfortable if the issue was covered in the press?
- Have I consulted colleagues who are informed about this issue?

If your answer to all of these questions is "yes," there may be no problem. If you answer to any of these questions is "no", you can continue to the next step.

### **What Should I Do as the Next Step?**

At this stage, there may be a violation of the Code of Business Ethics. Please consult your ethics representative.

### **Am I Sure?**

Think about your decision before continuing. Review the Code of Business Ethics. Check with your Ethics Representative one last time.

### **Continue**

If you are sure about your decision, then go ahead. Contact Akkök Group of Companies Ethics Hotline.





Conflicts of interest may also include close relatives and friends of our managers and employees. As a general rule, we avoid conflicts of interest. If conflicts of interest cannot be avoided, they need to be carefully managed. "Full disclosure" is a key element for managing conflicts of interest. Full disclosure requires us to declare any situations in which we or our close relatives may be subject to a conflict of interest. When a potential conflict of interest arises, you must fill out the conflict of interest declaration form in Annex 1 and submit it to the Ethics Committee.

## Practices

Below you can find common examples of conflicts of interest. These examples are provided to help you understand the concept of conflict of interest. Conflicts of interest that you may encounter may differ from these. When in any doubt, you can consult the Ethics Committee.

**Personal relationships at work:** Recruitment of close relatives and friends by an existing employee or personal relationships between subordinates and superiors are considered conflicts of interest at Akkök Group of Companies. If such a situation arises, existing employee should not to be involved in the decision to recruit their close relative or friend and not take part in performance reviews and salary decisions regarding that person and not be superior of that person, and also full disclosure should be made.

**Side/additional jobs:** Akkök Group of Companies expects its managers and employees to perform their duties in a complete manner. Therefore, they may not work in side/additional jobs that would disrupt their duties or cause a decrease in their performance, and they may enter into employment relationships with competitors, suppliers and customers. Appointments made by the employer and arbitration, mediation and expert duties assigned by judicial or administrative authorities are outside the scope of this article. Employees can become members of boards and non-governmental organizations established under the law, provided that they do not take part in the activities of such boards and non-governmental organizations during working hours, such membership does not create a conflict of interest with Akkök Group of Companies, and employees obtain written prior approval of senior management through the Company's human resources department.

**Partnerships:** Managers and employees cannot take part in decisions to cause Akkök Group of Companies to enter into business relations with a company in which they and/or their close relatives or friends hold a partnership.

**Gifts, entertainment and hospitality:** Employees do not directly or indirectly solicit gifts when conducting business with third parties. For details, please see the gifts and hospitality policy.

**Insider trading:** Managers and employees cannot use information that has not yet been disclosed to the public, which may affect the value of capital market instruments, for their own benefit or the benefit of third parties.

**Commissions, discounts and other benefits:** Managers and employees of Akkök Group of Companies cannot receive commissions, discounts or any other benefits from suppliers, customers and business partners with whom they have or may have commercial relations and cannot request such benefits to be provided to their close relatives and friends..

**Debtor-creditor relationship:** Managers and employees do not enter into any debtor-creditor relationship with parties that are directly or indirectly related to their duties, and do not receive goods or services for personal purposes and do not accept any benefits offered.

**Abuse of power:** Managers and employees cannot use their powers for the benefit of themselves and/or their relatives. They do not obtain direct or indirect personal benefits from the purchasing and sales activities of Akkök Group of Companies or from the Group's transactions and contracts.

## Authority and Responsibilities

This policy is issued by the Ethics Committee. The responsibility for compliance with the commitments provided in this policy rests with the board of directors of the Company while the management is responsible for implementation of the policy and Ethics Committee is responsible for investigation of the violations.

If you come across any breach of this policy or have any doubt about compliance with this policy, please consult the Ethics Committee.

We expect all our managers and employees to comply with this policy. Non-compliance with the policy may result in sanctions, including disciplinary action. You can report possible violations through the ethics representative, Ethics Committee or Akkök Group of Companies Ethics Hotline.



# Gift and Hospitality Policy >>>>>>>>>>

## Scope and Purpose

All activities of Akkök Group of Companies are based on the principles of accountability, honesty, fairness and transparency. Therefore, employees of Akkök Group of Companies cannot accept any benefits or gifts, whether of economic value or not, that affect or may affect their impartiality, performance and decisions while performing their duties. In some cases, gifts and hospitality may be accepted in order to strengthen commercial relations with third parties with whom we have business relations.

The purpose of this policy is to inform our managers and employees about the standards and criteria that will be applied by Akkök Group of Companies and to set out the guiding principles for matters involving:

- giving and receiving gifts from/to third parties with whom we have or may have business relations,
- inviting third parties with whom we have or may have business relations to hospitality events or being invited to any event by such parties, and
- giving gifts and hospitality to government officials or politically exposed persons.

We expect our managers, employees, suppliers, subcontractors, lawyers and consultants, business partners and all other stakeholders, including the board members of Akkök Group of Companies, to comply with this policy. This policy also applies to close relatives of our managers and employees.

## Definitions

**Hospitality:** Meals, accommodation, sport events, cultural events, conferences, receptions, trips and other social gatherings.

**Akkök Group of Companies Ethics Committee (Ethics Committee):** This is a committee that has been formed by the Board of Directors of Akkök Holding A.S. to provide leadership for the adoption and implementation of Akkök Group of Companies Code of Business Ethics and to examine possible violations.

**Akkök Group of Companies:** Companies under the management of Akkök, including Akkök Holding A.S. (including its affiliates and jointly controlled companies that have deemed it appropriate to be included in the system and appointed an ethical representative.)

**Ethics Representative:** A company employee appointed by the Company's Board of Directors as the person responsible for ensuring compliance of the Company and employees with the Akkök Group of Companies Code of Business Ethics.

**FCPA ("Foreign Corrupt Practices Act"):** U.S. Anti-Bribery and Foreign Corrupt Practices Act ("FCPA").

**Government Official:** A person who works in domestic or foreign government institutions for the purpose of serving citizens and carries out public activities



**Politically Exposed Person ("PEP"):** Heads of state or government, high level politicians, senior government, judicial or military officials, senior executives of public companies, leading political party officials.

**UKBA ("United Kingdom Bribery Act"):** The act which was enacted by the Parliament in 2010 in order to determine the regulations regarding bribery including foreign government officials.

**Close relative:** First degree relatives and dependents of an individual.

## Principles

Managers and employees of Akkök Group of Companies do not offer or accept any gift or hospitality that could put the Company in a difficult situation if it became known to the public, could violate applicable legislation or be seen as a bribe or kickback or result in preferential treatment in any business conduct. Occasional business meals with a customer or supplier and social events generally accepted in the business world are out of the scope of this provision. As a golden rule that should be taken into account when giving and accepting gifts and hospitality, the respective amount of such gift or hospitality and how it will be perceived from the outside should be considered.

## Practices

### Gifts

Never offer or accept cash or any cash-equivalent gifts, such as gift checks.

- The amount of receiving and giving a gift may not exceed a total of 200 EUR equivalent Turkish Lira per year for one person / organization giving the gift.
- If you want to offer or give a gift above the limit, approval of the Ethics Committee must be obtained.
- We may give or accept symbolic gifts such as datebooks, key chains and calendars with company logos or chocolates and flowers to/from customers, suppliers and other third parties within the framework of commercial activities. We need to make sure that such symbolic gifts do not influence any decision process.
- Gifts given / received should not be prohibited under the laws and regulations (such as FCPA, UKBA).

### Hospitality

- In order to strengthen our commercial relations with third parties, we may provide hospitality from time to time or accept hospitality offers.

- We do not accept or offer hospitality that does not fit its purpose and may affect our impartiality.
- We do not offer or accept sexually explicit or otherwise inappropriate hospitality.
- We ensure that such hospitality is not given or accepted on a regular basis and does not constitute bribery, kickback or improper payment. It should not be prohibited under the laws and regulations (such as FCPA, UKBA).
- It should not be prohibited under the laws and regulations (such as FCPA, UKBA).
- Spouses, family members and close relatives should not attend hospitality events.
- Hospitality expenses must be submitted to the accounting department along with any supporting documents with the approval of the respective manager.

### Relations with Government Officials and Politically Exposed Persons

Any gift or hospitality given or offered to public officials or politically exposed persons may be prohibited under the laws of the country in which we operate. Additionally, such gifts and hospitality offers may be perceived as bribe or facilitation payment. Therefore, we need to be more careful in our relationships with government officials and politically exposed persons.

- Never offer cash or any cash-equivalent gifts, such as gift checks.
- Gifts or hospitality cannot be offered immediately before or after a tender or during the tender process.
- Gifts or hospitality may need to be offered as a courtesy or as per a protocol as part of international relations. In such cases, approval of the Ethics Committee is required.

## Authority and Responsibilities

This policy is issued by the Ethics Committee. The responsibility for compliance with the commitments provided in this policy rests with the board of directors of the Company while the management is responsible for implementation of the policy and Ethics Committee is responsible for investigation of the violations.

If you come across any breach of this policy or have any doubt about compliance with this policy, please consult the Ethics Committee.

We expect all our managers and employees to comply with this policy. Non-compliance with the policy may result in sanctions, including disciplinary action. You can report possible violations through the ethics representative, Ethics Committee or Akkök Group of Companies Ethics Hotline.

# Human Rights Policy >>>>>>>>>>

## Scope and Purpose

At Akkök Group of Companies, respect for human rights is one of our most fundamental values and commitments. The purpose of this policy is to establish a framework that defines how we will fulfill our commitments regarding human rights. We expect our managers, employees, suppliers, subcontractors, lawyers and consultants, business partners and all other stakeholders, including the Board Members of Akkök Group of Companies, to comply with this policy.

## Definitions

**Akkök Group of Companies Ethics Committee (Ethics Committee):** This is a committee that has been formed by the Board of Directors of Akkök Holding A.S. to provide leadership for the adoption and implementation of Akkök Group of Companies Code of Business Ethics and to examine possible violations.

**Akkök Group of Companies:** Companies under the management of Akkök, including Akkök Holding A.S. (including its affiliates and jointly controlled companies that have deemed it appropriate to be included in the system and appointed an ethical representative.)

**Sexual harassment:** Unwelcome flirtations or sexual advances, requests for sexual favors, unsolicited physical contact and offensive verbal, visual or physical conduct of a sexual nature, jokes, explicit or humiliating remarks about physical appearance, obscene images, posters, screen savers or e-mail messages.

**Ethics representative:** Company employee appointed by the Company's board of directors as the person responsible for the compliance of the company and employees with the Akkök Group of Companies Code of Business Ethics.

**Harassment:** Unsolicited or disturbing verbal, visual or physical conduct.

## Principles

As defined in the United Nations Guiding Principles on Business and Human Rights, respect for human rights means preventing violation of the rights of others and taking necessary actions in case any such violation occurs. Furthermore,

we adhere to the laws and international conventions on human rights in all countries and business fields where we perform our operations. At Akkök Group of Companies, we regard human rights as an integral part of our corporate culture and Code of Business Ethics rather than simply being a matter of legal compliance.

We fulfill the requirements of the UN Global Compact, Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and similar codes and try to respect the rights of all our stakeholders.

At Akkök Group of Companies, we ensure that our employees have working standards which are, at least, compatible with the generally accepted international labor standards and laws of the countries where we operate. We are against discrimination in employment and profession, child labor and all forms of compulsory and forced labor. We believe in equal wage and opportunity.





# Practices

## Diversity and Inclusion

At Akkök Group of Companies, we oppose all forms of discrimination. We treat all employees fairly and honestly. We prioritize diversity and equal opportunity amongst employees and candidates. We do not tolerate discrimination based on race, language, religion, sect, gender, color, sexual orientation, age, social status, mental and physical disability. Our policy of zero tolerance to discrimination applies to all human resources processes including hiring and recruitment, promotion, performance management, training, career planning, succession planning, remuneration and benefits.

## Working Environment

We treat all employees honestly and fairly. We make best efforts to promote safety and peace at the work place. At Akkök Group of Companies, we are dedicated to creating a positive and harmonious working environment based on cooperation and mutual respect which is free from all sorts of harassment and unprofessional conduct. In matters of remuneration, working hours, benefits, overtime and similar matters, we comply with the laws and regulations of the countries where we operate. We respect work-private life balance

Employees are not allowed to use alcohol and substances at work and during working hours. They do not work under the influence of alcohol, illegal drugs and substances in or outside the work place.



## Health and Safety

We adopt all kinds of measures required to ensure occupational health and safety of our employees at the work place. We strive to take measures against occupational accidents, injuries and other conditions which will be detrimental to health of our employees. We conform to all laws and regulations on health and safety. We also inform our employees about the worksites outside the office.

## Prevention of Harassment and Violence

We do not tolerate any form of mobbing, harassment, intimidation, threat, bullying, neglect and similar conduct which are meant to humiliate and damage the reputability of an individual in society. Executives and employees will not intimidate and humiliate anyone at work. They will not engage in any behavior which makes another person feel under threat or unsafe. Verbal attacks, threats and all kinds of hostility, intimidation and aggression are amongst these behaviors. Akkök Group of Companies operates an Ethics Hotline in order to allow employees to report such behaviors. We do not take a reprisal action against people who report and complain about any harassment or those who assist in the investigation processes.

## Prevention of Child Labor and Forced Labor

We do not tolerate modern slavery, prison labor and forced labor. We expect our suppliers, subcontractors and other stakeholders to likewise not tolerate any form of forced labor.

We do not employ child labor under the age of 15, and we expect the same responsibility from our suppliers, subcontractors and all other stakeholders.

# Authority and Responsibilities

This policy is issued by the Ethics Committee. The responsibility for compliance with the commitments provided in this policy rests with the board of directors of the Company while the management is responsible for implementation of the policy and Ethics Committee is responsible for investigation of the violations.

If you come across any breach of this policy or have any doubt about compliance with this policy, please consult the Ethics Committee.

We expect all our managers and employees to comply with this policy. Non-compliance with the policy may result in sanctions, including disciplinary action. You can report possible violations through the ethics representative, Ethics Committee or Akkök Group of Companies Ethics Hotline.



# Anti-Bribery and Anti-Corruption Policy

## Scope and Purpose

All activities of Akkök Group of Companies are based on the principles of accountability, honesty, fairness and transparency. We perform our duties in accordance with the laws and regulations of the countries in which we operate. The purpose of this policy is to inform our managers and employees about the standards and criteria that will be applied by Akkök Group of Companies to prevent bribery and corruption and to set out the anti-bribery and anti-corruption principles. We expect our managers, employees, suppliers, subcontractors, lawyers and consultants, business partners and all other stakeholders, including the Board Members of Akkök Group of Companies, to comply with this policy.

## Definitions

**Akkök Group of Companies Ethics Committee (Ethics Committee):** This is a committee that has been formed by the Board of Directors of Akkök Holding A.S. to provide leadership for the adoption and implementation of Akkök Group of Companies Code of Business Ethics and to examine possible violations.

**Akkök Group of Companies:** Companies under the management of Akkök, including Akkök Holding A.S. (including its affiliates and jointly controlled companies that have deemed it appropriate to be included in the system and appointed an ethical representative.)

**Ethics Representative:** A company employee appointed by the Company's Board of Directors as the person responsible for ensuring compliance of the Company and employees with the Akkök Group of Companies Code of Business Ethics.

**FCPA ("Foreign Corrupt Practices Act"):** U.S. Anti-Bribery and Foreign Corrupt Practices Act ("FCPA").

**Government Official:** A person who works in domestic or foreign government institutions for the purpose of serving citizens and carries out public activities.

**Bribery:** Cash or something of value directly or indirectly demanded by a person with a private or public function from another person either for themselves or on behalf of others in order to perform, postpone or ignore any action related to or facilitated through their position.

**UKBA ("United Kingdom Bribery Act"):** The act which was enacted by the Parliament in 2010 in order to determine the regulations regarding bribery including foreign government officials.

**Close Relative:** First degree relatives and dependents of an individual.

## Principles

This policy guides us in our efforts to conform to the US Foreign Corrupt Practices Act (FCPA), UK Bribery Act (UKBA), UN Global Compact and anti-bribery and anti-corruption laws and regulations in all countries where we operate. This policy strictly prohibits all forms of bribery and corruption.



# Practices

## Bribery and Facilitating Payments

It is strictly prohibited to give, offer or allow others to give cash or anything with monetary value to government officials.

It is strictly prohibited to give, offer or allow others to give cash or anything with monetary value to third parties with whom we make business dealings in order to gain commercial advantages.

It is strictly prohibited to make facilitating payments in order to expedite or guarantee a routine transaction or process.

In case of any discrepancy between the rules stated in this policy and anti-bribery and anti-corruption regulations applicable in respective countries, the more stringent rules should be followed.

If any third party offers or demands to maintain its relationship with Akkök Group of Companies through bribery and corruption, it is imperative that the relevant offer or demand should be immediately reported to the Ethics Committee.

## Selection of Third Parties

Akkök Group of Companies conducts due diligence to select the suppliers or purchasers of goods and services, where their reputation and commitment to principles of ethics as well as their financial and technical capability are assessed. We do not engage with companies which have a track record of involvement in bribery and corruption.

## Gifts, Hospitality and Entertainment

Akkök Group of Companies may not offer any gift or hospitality to third parties and government officials with whom it has business relations, that may go beyond their intended purpose and wrongly influence the recipient's decision making. Please refer to the Gift and Hospitality Policy for more information about acceptable gifts, hospitality and entertainment intended to improve business relations.





In some cases, we may need to offer hospitality to government officials for training and business purposes. When such a situation arises, the ethics representative must be informed and permission must be obtained to ensure that it conforms to this policy and applicable laws.

### **Donations and Sponsorships**

Akkök Group of Companies firmly believes that sustainable development depends not only on innovative products but also healthy and well-educated generations who live in a clean environment. Thereby, the Group prioritizes sponsoring projects on education, environment, culture & arts, and social benefits. Akkök Group of Companies makes donations and aids in line with the articles of association and the donation and aid policy, if applicable.

It is imperative to take necessary measures in order to ensure that donations and sponsorships will not turn into illegal payments to government officials or third parties. In case of doubt, you may consult the ethics representative of your company. Donations and sponsorships shall never be used as a means to procure or maintain any privilege or commercial advantage.

### **Political Activities**

Akkök Group of Companies shall not donate and provide support to any political party, political figure or candidate for political office. Executives and employees are allowed to support such initiatives provided that the support is individual and legitimate. Executives and employees are not to use corporate assets for donations to political parties. They shall not engage in political propaganda, demonstrations and similar activities during working hours and at worksites. Managers may not demand their subordinates to engage in any political work or become a member of any political party.

### **Keeping Accounting Records Completely, Accurately and Transparently**

It is mandatory to keep all accounting records completely, accurately and in a timely manner in order to prevent bribery and corruption. All expenses should be entered into correct accounts with accurate amounts along with the supporting documents and necessary approvals. No document and accounting record may be falsified or altered. Accounting records should be clear and transparent in order to make them comprehensible for third parties in case of any audit.



## **Authority and Responsibilities**

This policy is issued by the Ethics Committee. The responsibility for compliance with the commitments provided in this policy rests with the board of directors of the Company, while the management is responsible for implementation of the policy and Ethics Committee is responsible for investigation of the violations.

If you come across any breach of this policy or have any doubt about compliance with this policy, please consult the Ethics Committee.

We expect all our managers and employees to comply with this policy. Non-compliance with the policy may result in sanctions, including disciplinary action. You can report possible violations through the ethics representative, Ethics Committee or Akkök Group of Companies Ethics Hotline.

# Supply Chain Code of Ethics

## Scope and Purpose

Akkök Group of Companies undertakes to adhere to the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, UN Universal Declaration of Human Rights and UN Global Compact. Therefore, Akkök Group of Companies expects its suppliers to act with the same level of care.

The aim of this Supply Chain Code of Ethics is to inform the suppliers of Akkök Group of Companies Code of Business Ethics and set forth our expectations from them.



## Definitions

**Hospitality:** Meals, accommodation, sport events, cultural events, conferences, receptions, trips and other social gatherings.

**Akkök Group of Companies Ethics Committee (Ethics Committee):** This is a committee that has been formed by the Board of Directors of Akkök Holding A.S. to provide leadership for the adoption and implementation of Akkök Group of Companies Code of Business Ethics and to examine possible violations.

**Akkök Group of Companies:** Companies under the management of Akkök, including Akkök Holding A.S. (including its affiliates and jointly controlled companies that have deemed it appropriate to be included in the system and appointed an ethical representative.)

**FCPA ("Foreign Corrupt Practices Act"):** U.S. Anti-Bribery and Foreign Corrupt Practices Act ("FCPA").

**Confidential Information:** All kinds of non-public technical, operational and financial information.

**Government Official:** A person who works in domestic or foreign government institutions for the purpose of serving citizens and carries out public activities

**Personal Data:** Any information relating to an identified or identifiable natural person.

**Bribery:** Cash or something of value directly or indirectly demanded by a person with a private or public function from another person either for themselves or on behalf of others in order to perform, postpone or ignore any action related to or facilitated through their position.

**Supplier:** Business partners supplying all kinds of raw materials, commodities, materials and services.

**UKBA ("United Kingdom Bribery Act"):** The act which was enacted by the Parliament in 2010 in order to determine the regulations regarding bribery including foreign government officials.

## Principles

Potential suppliers of Akkök Group of Companies will undergo "Supplier Selection / Evaluation" process according to which they will be evaluated in various domains including compliance with the principles provided herein. Also, suppliers' adherence to the Code of Ethics will be reviewed at regular intervals. To that end, Akkök Group of Companies may, at its discretion, audit or have independent organizations audit its suppliers in terms of compliance with these principles.

The article "Business Ethics" which forms part of the procurement agreement necessitates suppliers to agree, acknowledge and comply with these principles. Suppliers are obliged to inform / train their employees about this Code of Ethics. In case of violation of the principles indicated in this document, Akkök Group of Companies will be entitled to terminate the procurement agreement.



# Practices

## Compliance with Laws and Regulations

Suppliers shall be obliged to comply with the applicable laws and contractual provisions under their contractual relationship with Akkök Group of Companies. The countries where suppliers operate may introduce restrictions on the entities and individuals with whom they make business deals. Suppliers shall keep up with the trade restrictions, import/export controls, embargoes, sanctions, anti-corruption and customs laws related to their operations and undertake to comply with the relevant regulations.

## Respect for Human Rights

We expect our suppliers to fulfill the requirements of the UN Global Compact, Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and similar codes and conform to the requirements of the international conventions undersigned by the country where they operate.

Suppliers shall be obliged to maintain a working environment based on cooperation and mutual respect which offers equal opportunities without discrimination and free from all kinds of harassment and unprofessional conduct.

Suppliers shall be obliged to provide their employees with a healthy and safe working environment. Also, they shall be committed to uphold the confidentiality of the personal data of their employees (i.e. personal logs, photographs and residence addresses).

Suppliers shall undertake to act strictly in conformity with the applicable laws and employment agreements in relation to wages, working hours, overtime, leaves and benefits. Suppliers shall not tolerate any form of forced labor and they shall not employ children under the age of 15.

## Compliance with Competition Rules

We expect our suppliers to avoid any behavior that harms free and fair competition and to act in accordance with legal and ethical competition rules. Commercially sensitive information, including customer and product information, should not be shared with competitors. Information regarding competitors' businesses should be accessed only through legal methods. Methods that would cause unfair competition, such as driving competitors out of the market or preventing new competitors from entering the market, should be avoided.

## Anti-Bribery and Anti-Corruption

We expect our suppliers to comply with the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), UN Global Compact and the anti-bribery and anti-corruption laws and regulations in all countries where they operate. Our suppliers take the necessary precautions to ensure that their employees do not give or receive bribes or gifts of monetary value that may create the perception of bribery, or provide hospitality to government officials and other third parties in order to gain a commercial advantage.

## Managing Conflicts of Interest

It is essential that conflicts of interest are avoided and business relationships are managed based on the principles of accountability and transparency. Suppliers take the necessary precautions to avoid situations that would cause the personal interests of their employees to conflict with the interests of Akkök Group of Companies. No personal debtor-creditor relationship should be entered into with parties who are directly or indirectly involved in the supply relationship. Any action or behavior that could derive benefits for employees or their relatives by using the Company's name, resources, reputation and position in the Company should be avoided. Information obtained as a result of the duties and powers assumed for the business relationship should not be used for the benefit of employees or their relatives. Suppliers and their employees should take necessary measures in order to ensure that their personal interests do not conflict with the duties assumed for Akkök Group of Companies in line with the rules designated by Akkök Group of Companies.

## Gift and Hospitality Rules

Under limited conditions, suppliers may accept gifts and entertainment in order to improve or sustain the business relationships between enterprises. Suppliers should not accept or give any gift which may constitute as violation of the laws except for customary gifts and promotional items. Also, they should avoid accepting improper hospitality and gifts with excessive value.

Suppliers should never accept gifts in cash or a cash equivalent such as gift checks. Suppliers should not offer or accept gifts or hospitality which could be perceived as bribe or kickback or result in preferential treatment in performance of any business. We expect our suppliers to pay attention to these issues and show utmost care, especially in their relations with government officials.

## Protection of Confidential Information

Suppliers may have access to confidential information in order to perform their obligations arising from their business relationship with Akkök Group of Companies. Suppliers are obliged to keep all kinds of information and personal data of Akkök Group of Companies, its employees, customers and other business partners confidential. Confidential information should not be disclosed to third parties unless required by governmental authorities and under the applicable laws.

# Authority and Responsibilities

This policy is issued by the Ethics Committee. Akkök Group of Companies Supply Chain Code of Ethics aims to ensure that the business methods adopted by suppliers conform to the values of Akkök Group of Companies, principles of business ethics and applicable laws. All suppliers are expected to strictly comply with the requirements stated in this policy. This policy is an integral part of the supplier agreements. Suppliers should

prepare rules and create principles of practice for their own suppliers. Akkök Group of Companies reviews the compliance of suppliers with these rules under the supplier audits. Akkök Group of Companies may request a supplier to dismiss any employee who acts in violation of the applicable laws or this policy and/or terminate the agreement with the relevant supplier.

Affiliates of Akkök Group of Companies may, at their discretion, create a more detailed Supply Chain Code of Ethics in order to determine the audit and principles of practice specifically for the relevant company. The relevant policy shall not contradict with the provisions of this policy.

Akkök Group of Companies Code of Business Ethics contains the methods to be observed by suppliers in order to make decisions about the potential infringements of principles of ethics and violation of the applicable rules.

Our stakeholders are welcome to report their complaints to Akkök Holding Ethics Committee and Ethics Hotline.

Akkök Group of Companies Ethics Hotline;

The hotline is available from 08:30 to 17:30 on weekdays and is operated by an independent, specialized organization. This independent organization may disclose the identification details of any whistleblower with the Ethics Committee only if prior permission is obtained from that person.

We can reach the Ethics Committee via the Ethics Hotline at 0850 202 66 15 from 08:30 to 17:30 on weekdays, or via the web portal, mail or e-mail by using the contact information below.

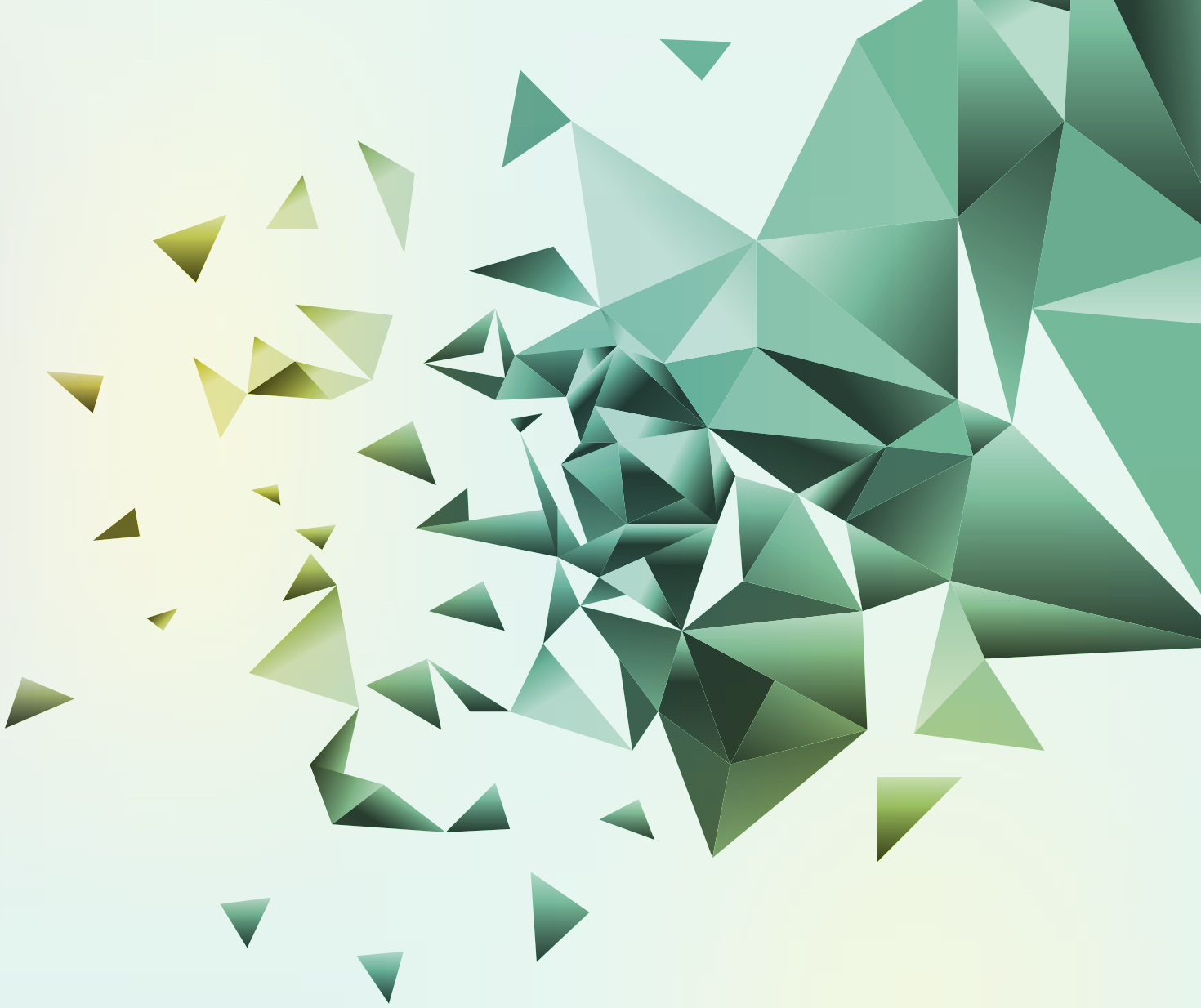
Contact information:

**Miralay Şefik Bey Sokak Akhan No:15  
34437 Gumussuyu - Istanbul / Turkey**

**akkokethics@kpmg.com**

**www.akkokethics.com**

During subsequent investigation of a possible violation of the Code of Business Ethics, no action will be taken against those reporting it, participating in, or assisting with, the investigation (except in cases where the report itself or the information provided is deliberately misrepresented). Akkök Group of Companies Ethics Committee will keep all reports confidential. Akkök Group of Companies Management will provide full support an evidently inappropriate behavior is reported in good faith and honestly.



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