



## Codes of Conduct

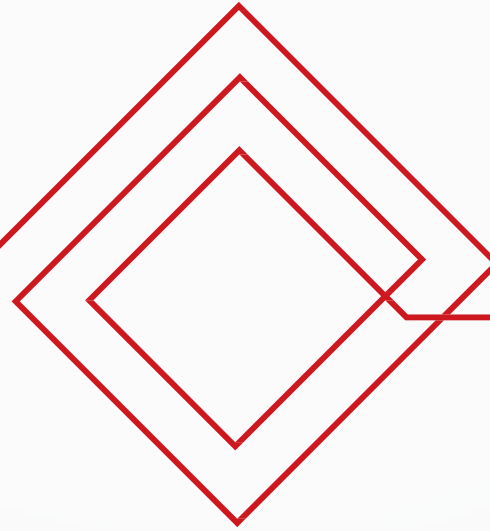
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# Akfen

## Our Codes of Business Conduct

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## Our Codes of Conduct



*Başkaları izlemese bile doğru şeyleri yapma dürüstlüğü*



- Be Honest...
- Act Respectfully...
- Adopt Transparent Business Relationships...
- Exercise Your Authorities Fairly, Impartially and Consistently...
- Comply and Ensure Compliance With the Codes of the Business Conduct...

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# YOU HAVE A MESSAGE FROM THE MANAGEMENT...

Dear Valued Akfen Family,

Akfen Values that we have determined all together have become the indication that Akfen culture that has been developed with the valuable contributions of each of us so far today has been built on honesty and dignity. We, as members of Akfen, have agreed that our identity is the symbol of our reputation and our honesty is the symbol of our quality. We plan to strengthen and extend our culture that makes us members of Akfen through these values.

To this end, we believe in the importance of documenting the conducts and attitudes that have guided and so they will guide us in our relationships with each other and persons, entities and all our stakeholders that we work with, making them accessible and understandable for everyone, and communicating them to each member of Akfen Family with a written document.

We are very lucky as our conducts and attitudes forming our culture have been based on a solid infrastructure for many years. However, sometimes what is true may become wrong with the pace of the changing world and technology, and the actuality of wrongs may be queried. Accordingly, we wish that our Codes of Conduct, which we have developed with both the responsibility of being a publicly traded company and the awareness gained by working with foreign partners, will be an inspiration to you in the gray areas of your daily business life or in the circumstances where you have dilemmas. We plan to develop a written reference about our way of doing business and ethical approach through the Codes of Conduct, rather than making individual behavior assessments.

As you know, Akfen, which have signed the Global Compact, is at the status of a exemplary company with both its way of doing business and success and its management of relationships. We wanted our company to become transparent and accountable, and sustainable and permanent by documenting the unspoken codes of our company, which has deserved this respect with its honesty all these years.

We thank you for the role that you have played in the development of this culture and we express our gratitude as you do not make us concern about adhering to these codes.

We remind you the codes that are forgotten and neglected because of the hustle and pace of the daily life once again and we thank you once more for developing the corporate responsibility as well with the individual responsibility you assume.

Sincere regards,

**Pelin Akin**  
Member of the Board of Directors



# OUR VALUES



## **ALL DUTIES ARE IMPORTANT, ALL EMPLOYEES ARE VALUABLE**

We care about the ideas of our employees and promote their participation. We embrace the success together thanks to the duties which are assumed and fulfilled devotedly by each member of our family.



## **WE ARE DYNAMIC and ENTREPRENEUR**

Our knowledge and experience make us strong for new initiatives and opportunities. We promptly realize the changes by acting in a rapid and determined manner with our innovative style.



## **HONESTY IS THE SYMBOL OF OUR QUALITY**

We treat our employees, business partners, shareholders and social stakeholders transparently.



## **OUT INVESTMENTS ARE BOTH MATERIAL AND MORAL**

While aiming at sustainable success with our strategies that take into account the societal needs, we make investment in human with our social responsibility activities.



## **WE WALK ON A PATH WITHOUT FOOTPRINT**

We break grounds by managing the risks with our genuine, innovative and distinctive sense of business, and we are pioneers and serve as a model in the fields where we operate.



## **WE EMBRACE OUR BUSINESS AND LEARN EVERYDAY**

Learning and making progress are our power. We consider it as a privilege that our employees assume responsibility and take initiative, we authorize and encourage them.



## **OUR IDENTITY IS OUR REPUTATION**

Our reputation that is developed with our achievements, sense of quality, ethical approach and values and that builds trust is our source of pride.

# AKFEN ETHICAL HOTLINE

*We want to hear your concerns and queries. Speak, ask and communicate. Protect yourself and your company. 'Do not say that only once does not hurt!'*

*To identify, prevent and protect... Do not involve in violations...*

It is your right and responsibility to notify your problems or request guidance for the circumstances that you have hesitation as to how you should act. Only in this way, our company can deal with your concerns, problems or the circumstances that you detect violations and take the necessary protective measures in the most appropriate manner by protecting both the company's and your reputation without allowing the violation of the legal legislation.

It has been tried to include most of the circumstances that you may need in the Codes of Business Conduct. However, if the circumstances that you have hesitation are not included in the codes of conduct, do not hesitate to consult. You can contact via the following hotlines in order to make a notification or request guidance:

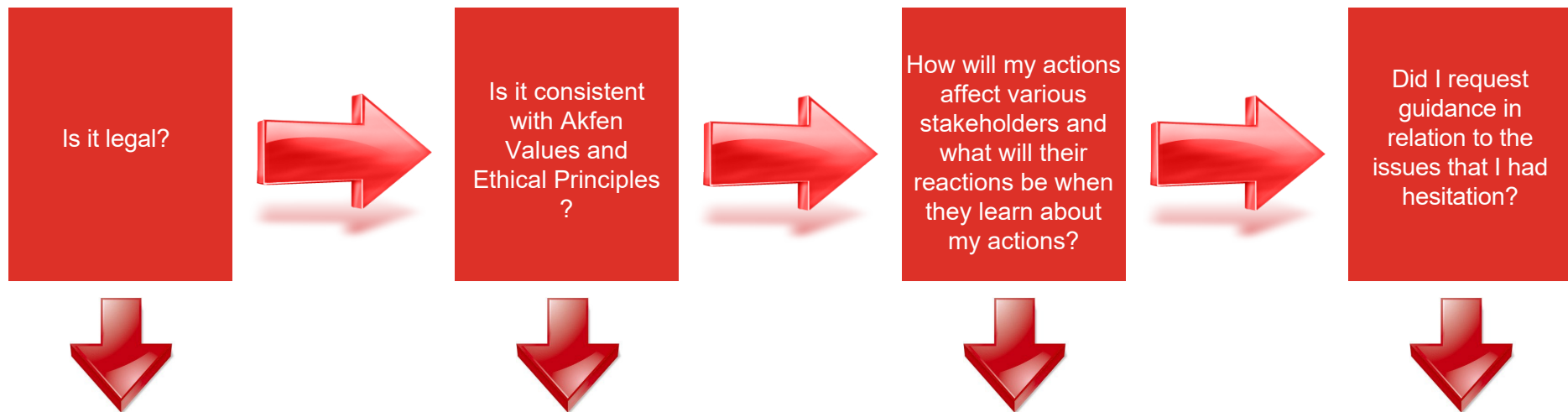
**Click and send an e-mail**



# AKFEN CODES OF BUSINESS CONDUCT

Akfen Codes of Business Conduct, which have been established in order to increase the corporate value of Akfen, define the principles and practices which all managers and employees are obliged to comply with. With these codes, it is aimed that the managers and employees of Akfen exhibit behaviors at high standards and be aware of the corporate effects of their conducts and attitudes and that all members of Akfen family use the most accurate methods.

Although Akfen Codes of Conduct do not substitute the policies and standards used in the current practices, they aim to guide for the hesitated circumstances. It is expected that timely, accurate and sustainable decisions are taken in the fields where the solution of the problem is not clearly definite. The following questions are asked before taking the business decisions that will directly or indirectly affect Akfen:



If the answer "**yes**" cannot be given, any decision and action must not be taken until guidance is provided.



# AKFEN CODES OF CONDUCT

## ■ COMPLIANCE WITH LAWS, REGULATIONS

While we operate in various industries and lines of business with our goal to become a sustainable country company, we are subject to many different laws. We are in interaction with different individual and corporate groups including customers, employees, partners, shareholders, banks, competitors, media, subcontractors, governmental agencies etc. every day. We aim to maintain our business relationship with all these stakeholders respectfully, morally and in compliance with the laws.

### ***Respect to Equal Opportunities***

As Akfen, we are respectful to different cultures, traditions and business practices that we encounter with in the lines of business where we operate. In this sense, we accept and value the religious, structural and cultural differences of the stakeholders with which we are in interaction. We treat equally everyone without any discrimination in terms of religion, language, race, gender, age and ethnicity.

**Case:** I am the only woman working in the department. Our department manager requests the proposed solutions from each of us in relation to a problem discussed at the department meeting and notified that we would discuss the proposed solutions at the next meeting. When I attended the next department meeting, my department manager did not even discuss the solution that I proposed by asserting that it was inappropriate. I think that the idea that I proposed was not paid attention because I am woman. What should I do?

**Solution:** All kinds of behaviors and expressions that will cause discrimination is strictly forbidden within the organization of Akfen. You must first share your concerns in this regard with your superior along with its reasons. If you are not satisfied with the answer that you got from your superior or if you think that there is no change in your superior's attitude towards you, you must make a notification about the circumstance via the Ethical Hotline.

# AKFEN CODES OF CONDUCT

## ■ COMPLIANCE WITH LAWS, REGULATIONS

### ***Respect to Intellectual Rights***

We act in compliance with the laws and regulations regarding the protection of intellectual rights of all persons and entities and refrain from using the trademarks, patents, logos, copyrights, trade secrets and computer programs and other intellectual and industrial rights of other entities intentionally and in an unauthorized manner and unlawfully copying them.

**Case:** I detected that the logo which the agency that we work with in order to use in Akfen presentation was subsequently used by another company. What should I do in this regard?

**Solution:** Care must be taken to act in compliance with the laws, regulations and contracts regarding the protection of intellectual rights of all persons and entities. For the purpose of preventing the use of intellectual rights of other entities, you must obtain the opinion of the Deputy General Manager Responsible for the Legal Affairs in relation to the actions required to be taken.

# AKFEN CODES OF CONDUCT

## ■ COMPLIANCE WITH LAWS, REGULATIONS

### *Accepting and Giving Gifts*

By being aware that the practices of accepting and giving gifts may differ depending on the local cultural values, we carry out the process honestly and by recording in a manner that gift exchange will not be in contrary to the principles and policies of Akfen, will not impair our reputation and will not legally constitute a crime. We always refrain from accepting and giving gift, grant or entertainment offers that may positively or negatively affect any decisions in the commercial transactions.

#### *Acceptable Gifts and Entertainments;*

- Having reasonable material value,
- Being required by the purpose of work,
- Being lawful,
- Being consistent with the local traditions and practices.

#### *Strictly Unacceptable Gifts and Entertainments;*

- Cash money and equivalent,
- Being perceived as a bribe, having high material value k
- Purchases made from special resources,
- All gifts and entertainments to impair the reputation of Akfen.

**Case:** The company that we work with sent a gift which I am aware that its value is higher than 150 TL for Christmas. As we work together, I have hesitation that if I return the gift, our business relationship may be harmed. How should I proceed in this regard?

**Solution:** It is a part of our culture to accept and give small gifts on special days; and gifts can be accepted unless there is no legal obstacle. However, it is not convenient to accept gifts which have such a material value that will cause third parties to become suspicious. You must necessarily inform your manager in this regard. We recommend to record and donate the gift to TIKAV with the thought that the return of the gift will cause harm to the business relationship.

# AKFEN CODES OF CONDUCT

## ■ COMPLIANCE WITH LAWS, REGULATIONS

### ***Fraud, Bribery and Borrowing***

As the employees of Akfen, we do not admit accepting, giving or offering a bribe under any circumstances. We do not request any personal privilege from the sub-employers, suppliers, consultants, competitors or customers.

**Case:** Is it ethical if I request a discount for personal flight bookings from the agency that we have the flight bookings made institutionally?

**Solution:** It is not appropriate to use the business relationships within the framework of personal interests. On the other hand, it is strictly forbidden to make the companies that you work with cover personal travel expenses and similar payments. A request for discount can only be made if it will be applicable for all Akfen employees. You must necessarily inform your manager before making a request for discount.

# AKFEN CODES OF CONDUCT

## ■ COMPLIANCE WITH LAWS, REGULATIONS

### *Procurement Decisions and Practices*

We act in compliance with the applicable laws and regulations in our procurement negotiations and decisions and within the contract processes, and we also expect the same fair and honest approach from our suppliers. We mind that the suppliers that we collaborate with have adopted the principles that are consistent with our values and they have understood our ethical expectations.

We impartially evaluate the proposals of all suppliers without any discrimination in terms of performance, quality and cost criteria within our decision processes, and we may terminate the business relationship with our collaborators that fail to meet the expectations by taking into account the contract conditions.

**Case:** Is it ethical if I direct my friend who works in the field of cleaning materials wholesale to the Procurement Department by considering that it will offer a more cost-effective price?

**Solution:** When the company's interest is taken into consideration, it is convenient to obtain an alternative price offer. However, if you are exactly in the decision-making position in the selection of supplier in relation to the mentioned procurement, it is not considered as ethical with the thought that the selection that you will make cannot be impartial. You must necessarily inform your manager in this regard. If you are not exactly a decision-maker, you can ensure that a price is offered on condition that you must inform the concerned persons.

# AKFEN CODES OF CONDUCT

## ■ INFORMATION SECURITY AND MANAGEMENT

As the members of Akfen, each of us creates and uses or learns about various information every day as required by our areas of activity. Therefore, we attach importance to the management and protection of the information that we obtain in order us to maintain our activities in compliance with the legal regulations and in an appropriate, honest, reliable and effective manner.

### *Information Confidentiality*

In order to protect the confidential and non-public information belonging to Akfen, we use them only for the company's areas of activity and process improvements within the framework permitted by the legal regulations, and we abstain from using them for our personal interests. We do not share the company information that we have obtained due to our area of activity or the operations which we are responsible for with person from inside or outside the company without the valid and legal consents. We are aware of the importance of keeping the information that we have obtained as secret all the time even if our working time or duty in Akfen ends. Otherwise, we are aware that we put the company and us at critical legal risk. We take the necessary measures with Non-disclosure Agreements in order to prevent the improper use of the information.

- *We do not share the confidential information with our families, friends or third persons.*
- *We do not talk and discuss about the confidential information in the places where third persons may hear, in the dining hall of the company or in the corridors.*
- *We do not keep and use the written or electronic documents that contain confidential information in public areas where third persons may see them.*

**Case:** A hospital that will provide the employees with opportunities and discounts requested the e-mail addresses and phone numbers of the company in order to inform the employees in this regard. Is it convenient if I share such information?

**Solution:** Although the opportunities and discounts are for the benefit of the employees, it is not proper to share the personal e-mail addresses and phone numbers with external entities. In order to inform the employees, you can use the portal or ensure that the introductory mail received is send from the HR e-mail address.

## ■ INFORMATION SECURITY AND MANAGEMENT

### **Information Security**

We retain our company records in compliance with the legal regulations and protect them against unauthorized access with the awareness of the importance and necessity in the protection of information integrity and accessibility. We collect, process, store most our records in electronic environment and we transfer them to the use of other computers via the network.

The prevention of unauthorized use, modification and deletion of the information within our area of responsibility is a legal requirement as well as it is our business obligation. Therefore, we necessarily inform our superior in the circumstances where we are suspicious about any security vulnerability and we request support from the Information Processing Directorate in the case of necessity.

- *We ensure the access to the company records with personal encryption,*
- *We use licensed products,*
- *We periodically update the passwords in line with the password policy of Akfen,*
- *We actively use and update the anti-virus programs,*
- *We keep our operating system up-to-date.*

**Case:** Is it inconvenient if I share my information system password with my team mate for entering data?

**Solution:** It is definitely inconvenient. Your password which you defined for logging in the company computer and information system is personal. You must not share your password with another person for any reason whatsoever and pay utmost attention to keep it confidential.

# AKFEN CODES OF CONDUCT

## ■ INFORMATION SECURITY AND MANAGEMENT

### **Social Media**

As we are aware of the role and potential of social media in today's interaction world, we avoid making statements and express opinions on behalf of Akfen without the knowledge/approval of the company's spokesmen on virtual platforms (facebook, twitter, blog vb.). We inform the Corporate Communication Department which is responsible for the media relations for our concerns and hesitations related to the news that we read or see about Akfen. Our areas of responsibility depending on their subjects are as follows; our Corporate Communication Department is responsible for the general media communication, our Investor Relations Department is responsible for the public operational and financial performances, our Deputy General Manager Responsible for Legal Affairs is responsible for the company's practices and the legal regulations, and our Human Resources Department is responsible for the employees and potential employees.

**Case:** I read news that containing incorrect and unfavorable information about Akfen on an online media that I follow up. Is it inconvenient if I share my opinions related to the subject matter via my own account?

**Solution:** The reputation management, crisis management, media and agency relations management activities on all internal and external communication channels to serve to the vision and mission of Akfen are within the area of responsibility of the Corporate Communication Department.  
You can share the subject matter with the Corporate Communication Department.



# AKFEN CODES OF CONDUCT

## ■ CONFLICT OF INTEREST

### ***Conflict of Interest***

We observe and prevent the circumstances where our individual interests and the interests of Akfen or associated persons and entities may conflict. While fulfilling our duties, we value the self-interests of Akfen above everything and we avoid all kinds of behaviors that mean gaining advantage for ourselves or our relatives by using the resources or reputation of Akfen.

- *The family of the employee or the persons who have kinship with the employee to third degree have commercial relationship with Akfen,*
- *The family of the employee or the persons who have kinship with the employee to third degree have ownership and relationship based on self-interest in the competitor companies,*
- *The employee hires the companies in which the family of the employee or the persons who have kinship with the employee to third degree work,*
- *The employee has commercial relationship with the companies under which the employee works.*

**Case:** The restaurant which my spouse operates offered an appropriate price for the company's fast-breaking meal organizations. Is it convenient if the fast-breaking meal organization is held in my spouse's restaurant?

**Solution:** It may be considered appropriate to hold the meal organizations in that restaurant if cost-effective and high-quality service is provided. However, if you are personally involved in the decision on meal organizations, the commercial business relationship that you will enter into with your first-degree family member will cause a conflict of interest and lead to misunderstanding. Therefore, it is in contrary to the codes of conduct.

# AKFEN CODES OF CONDUCT

## ■ CONFLICT OF INTEREST

### *External Working*

We do not accept any duty, whether public and private, whether permanent or temporary, or whether paid or unpaid, other than our own duties in Akfen without the knowledge and approval of Akfen, we do not work and serve as a consultant in another institution or organization.

**Case:** In relation to the last projects that I carried out, a consulting firm presented an offer for me to work with at the weekends. This is not a situation that will cause me to disrupt by works as it is for weekends. Is it inconvenient if I accept the offer?

**Solution:** The prohibition to work in another job is an article set forth and signed in the employment contract and it is definitely unacceptable.

# AKFEN CODES OF CONDUCT

## ■ SENSE OF ACCOUNTABLE WORKING

As the members of Akfen, we believe in the sustainable working principles that take into account the needs of the society and create added value to the society with our accountable corporate citizen identity. We build and maintain relationships based on respect and trust with all of our stakeholders.

### *Environmental Management*

We aim at living in an environmentally sustainable world and leaving a healthy, clean and livable world to the next generations, and to this end, we take care to use high-standard practices within the framework of the relevant legal legislation and regulations in our activities. By being aware that the most important heritage that we will leave to the next generations will be the environment, we avoid using power and natural resources unnecessarily, act on the basis of the environmental protection principle in our investments and seek for the methods of reducing waste consumption.

We avoid violations of environmental rules, which may cause harm to the health and rights of the employees, customers and those living in the region where we operate. Within this scope, we report the damage caused to the environment, act in a manner to minimize the adverse effects and take the preventive measures while taking our business decisions.

**Case:** About the company from which we purchase materials for our construction projects, news have started to be heard by the public that it does not produce by the environmentally friendly application methods and it threatens the environmental health. What should I do in this regard?

**Solution:** We attach importance that the natural resources in the environment are consumed at minimum level, high-quality materials which are suitable for the environmental health are used and recycling is assured in all activities in the areas in which we operate. Therefore, it is important that the materials which we purchase from the suppliers are also produced by the environmentally friendly technologies in line with our quality targets. You must change the supplier by informing your manager in this regard. Furthermore, you must obtain the opinion of the Deputy General Manager Responsible for Legal Affairs for the contract terms.



## ■ SENSE OF ACCOUNTABLE WORKING

### ***Human Rights - Mobbing***

With the aim of contributing in developing a common culture in the business world within the framework of universal principles, we promote the fundamental human rights established with the United Nations Global Compact and we foster these rights while conducting our activities with our title of the first Holding that concluded the Compact.

- *Freedom of thought*
- *Right of privacy*
- *Right to fair and equal employment*
- *Right of access*

**Case:** My superior under whom I work is continuously warning me to be faster and not to make mistake, and he uses humiliating words when I am with my colleagues. This situation adversely affects my motivation and increases the risk for me to make mistake as well as it makes me embarrassed among my colleagues. Is there anything that I can do in this regard?

**Solution:** While our managers are expected to respect the employees' rights and personalities, it is never allowed that our employees are exposed to mobbing in a manner to abuse human rights in the work environment. All employees must be treated and all employees must treat each other respectfully. If you think that you are not treated professionally, you must first consult with your superior and then with the Human Resources Department.

# AKFEN CODES OF CONDUCT

## ■ SENSE OF ACCOUNTABLE WORKING

### *Contribution to the Society*

We realize activities that will contribute to the societal development via the foundations and supported associations in order to provide high-quality human resources to the society with the awareness of corporate social responsibility. We volunteer to promote individual activities that reflect Akfen values and are for the benefit of the society. We carry out our volunteering activities out of our working hours and with our own resources. We adopt the principles of every contract that Akfen concludes as a corporation.

**Case:** The association in which I individually carry out volunteer work is going to organize a fair at the weekend. When I invite my acquaintances to the fair, I inform them that they can donate their second-hand items such as shawl, watch, jewelry which they do not use in order to be sold in the fair. I think that some of Akfen employees may want to volunteer as well. Is it inconvenient if I share the issue?

**Solution:** You can carry out your activities in the association with your own resources and share the situation with your colleagues within the knowledge of your superior. However, you must necessarily abstain from forcing your colleagues and carry out the activities out of the working hours in order not to impair the efficiency at the workplace.

# AKFEN CODES OF CONDUCT

## ■ SENSE OF ACCOUNTABLE WORKING

### ***Accuracy in Financial and Commercial Records***

Our reputation that builds trust is at the heart of the sustainable business relationship that we have established with our stakeholders; and from this point of view, we record and report all kinds of information regarding our activities in an accurate, consistent and complete manner. We submit the current and valid information reflecting the truth about Akfen, which has been issued in compliance with the Law to the public and the other governmental agencies in a timely manner.

**Case:** I incidentally noticed that the data requested from another department in relation to the subject of the report was sent incorrectly and also reflected to the report inaccurately while examining the report prepared by our department. Should I warn my colleagues in the department and manager about this incorrect data which I am aware that it has no significant effect on the result of the report as numerical value?

**Solution:** When you notice that the records include incorrect or incomplete information, you must immediately inform your superior in this regard, regardless of the magnitude of the error and deficiency. It is essential to report in a manner to reflect the truth completely and accurately.

# AKFEN CODES OF CONDUCT

## ■ SENSE OF ACCOUNTABLE WORKING

### *Use of Akfen Resources*

We protect the records, machinery, equipment, fixture and vehicles belonging to Akfen all the time, and we prevent the sources from being improperly used, damaged, wasted and lent out, rented out and sold to others. Furthermore, we abstain from personally use the means of communication and transportation provided within the framework of the powers and responsibilities required by our positions.

**Case:** For the exam which my child will take, the teacher of my child gave exemplary exam questions and answers. Can I reproduce the exam printouts in the company's photocopier which is in common use?

**Solution:** If there is no special circumstance, it is not appropriate to use the company's equipment for personal purposes.

# AKFEN CODES OF CONDUCT

## ■ SAFE WORK ENVIRONMENT

### ***Violence at the Workplace***

We consider every circumstance where our employees are abused, exposed to non-physical violence such as oppression and threat, and their security and health are put at risk as a violence factor. We initiate the necessary legal process when we face any behavior and action involving harassment, threat and physical violence in any manner whatsoever without tolerating such a circumstance.

**Case:** After a business-related quarrel that I had with my colleague at the meeting, my colleague came to the office and warned me not to let a similar incident occur again. I feel threatened, how can I get help in this regard?

**Solution:** You must inform your superior and the Human Resources Department when you encounter with any behavior and action involving physical or non-physical violence in any manner. The situation that you experienced may endanger your security in both the work environment and your social life. If you think that this attitude will continue or increase, you should request help via the Ethical Hotline.



# AKFEN CODES OF CONDUCT

## ■ SAFE WORK ENVIRONMENT

### *Health and Security*

We mind the establishment of a healthy, secure and safe work environment. While we take utmost care in complying with the health and security issues in all our activities within our company, enterprises and construction sites, we take all kinds of measures in order not to imperil the health and security of us and others.

We follow up the regulations and developments related to occupational safety and avoid being negligent.

**Case:** I saw that one of the workers serving under the subcontractor company in our housing project under construction was walking around without helmet at the site. Should I give information in this regard?

**Solution:** You must immediately notify your superior of any kind of behavior that will put the safety and security of the work environment at risk.

# ETHICAL COMMITTEE

## MEMBERS OF THE ETHICAL COMMITTEE:

- *Chairman of the Committee: Deputy General Manager Responsible for Legal Affairs*
- *Member of the Committee: Internal Audit Manager*
- *Member of the Committee: Human Resources Manager*
- *Secretary of the Committee: Human Resources Specialist*

## RESPONSIBILITIES OF THE ETHICAL COMMITTEE:

The Committee, which is responsible for examining, investigating, assessing, resolving the ethical violations arising in Akfen Holding and its Subsidiaries or the ethical dilemmas notified to the Committee by application independently from the personal and interpersonal relationships as soon as practicable and informing the parties and the Senior Management, works directly under the supervision of the Corporate Governance Committee.

## POWERS OF THE ETHICAL COMMITTEE:

- *To request the subject-related information, documents and evidences from the relevant department/departments,*
- *To request the relevant departments to assign a technical specialist/consultant to the Committee when required,*
- *To take decisions regarding the manner of implementation in the case of ethical dilemmas and to change the process and amend the corporate legislation when required,*
- *To identify the measures required to be taken within the framework of the disciplinary rules,*

## WORKING OF THE ETHICAL COMMITTEE

- *No leverage can be put on and no suggestion can be made to the Committee about the subject of examination.*
- *The Members of the Committee work independently from the hierarchical structure within the organizational structure of the company during the examination.*
- *The identities of the employees who apply or make a complaint to the Committee are kept confidential and are not disclosed unless it is required.*
- *The Committee carries out its activities so as to be limited to the subject of application.*
- *The activities and minutes of the Committee are recorded by including all kinds of documentation and in written.*

