

# EFESAN GRUP

## Ethical Codes of Conduct and Codes of Practice

Revision	Issue Date
01	24.11.2017
02	18.04.2019
03	14.01.2020

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## Ethical Codes of Conduct and Codes of Practice

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### 0 Introduction

Efesan Grup aims to meet the customers satisfaction, provide products and services in universal quality and standards through effective use of scarce natural resources, and contribute to the economic social development. In this way, it aims to be a symbol of reliability, continuity and dignity for its customers, shareholders, employees, suppliers, dealers and authorized services - in short, all of its stakeholders - both at the national and global scale.

- Our customers are our patrons,
- Always being the best is our indispensable goal,
- Our most important capital is our human resources,
- Our goal is to create resources for continuous development,
- We aim to add strength to the economy of our country, where we derive our strength,
- Our doctrine is to abide by the principles of superior business ethics and honest work.

It is aimed with the Efesan Grup Ethical Codes of Conduct, which are based on the above principles, to provide guidance to the employees of Efesan Grup and those acting on behalf of the Efesan Grup, on the decisions they shall make and in the behaviours they shall perform, while carrying out their duties.

All Efesan Grup employees are expected to adopt the attitudes and behaviors that will ensure the cultural integrity of the group. In addition, all employees are expected to protect and improve their dignities and the credibility of Efesan Grup's corporate structure.

All employees employed within Efesan Grup, also including the temporary personnel, are obliged to comply with the Efesan Grup Ethical Codes of Conduct or the Company Ethical Codes of Conduct established accordingly. All stakeholders are expected to abide by the rules of business ethics and all codes of practice that support these rules.

Informing all employees about the Ethical Codes of Conduct, ensuring that the employees give due importance to these rules, and putting in the necessary efforts as well as showing leadership in complying with the Ethical Codes of Conduct shall be among the main duties and responsibilities of the mid-level and senior managers that work within the Efesan Grup.

The responsibility of certifying that the latest version of the Ethical Codes of Conduct and Codes of Practice document has been read and understood by the employee and that the employee has committed to implement the Ethical Codes of Conduct and Codes of Practice lies with the immediate supervisor of the employee.

### 1 Efesan Grup Employee Relations

Comprising the most successful and competent professionals that create added value to ensure sustainable growth, Efesan Grup aims to be the most preferred and the ideal company, which everybody is proud to be a part of.

Efesan Grup values its employees and respects their employee rights. The policy of "Our most important asset is our human resources", is one of the very basic principles adopted by Efesan Grup from the day it was founded.

In this context, the following principles constitute the basic principles in terms of relations with employees;

- To seek for the qualification of fitness for work as the single measure in recruitment and employment, and ensure equality of opportunity without discrimination,
- To bring in our Community the most qualified young people and experienced professionals who will carry our Group into the future,
- To derive maximum benefit from employees' abilities, strength and creativity,
- To provide equal means and opportunities for training, orientation and development of employees,

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- To reward success through fair and competitive remuneration policies, effective and objective performance assessment systems and practices,
- To deepen the employees' commitment to the company by providing equal opportunity in promotion and rewarding,
- To ensure the continuity of labour peace,
- To provide clean, healthy and safe working conditions to employees,
- To create and maintain a working environment that encourages transparent and mutual respect, where cooperation and solidarity are the most important elements,
- Not to allow any shape, form or manner of harassment in the workplace,
- To evaluate and respond to the opinions and suggestions of employees, and to take motivational measures,
- Not to share the private information of the employees with third parties without the permission and awareness of the employees and except for any legal obligation, and
- To respect human rights.

## 2 Efesan Grup External Relations

The basic principles that guide Efesan Grup's relations with its stakeholders are listed below:

### 2.1. Communication with Stakeholders

- To represent the "Efesan" brand before the community and to increase its reputation,
- To make use of the criticism and suggestions made by the stakeholders by keeping the channels of communication open with the stakeholders, and to maintain positive relations with the stakeholders,
- To refrain from the disclosure of personal opinions when sharing opinions with the public.
- To create mutual value in business relations with suppliers,
- To conduct communication with suppliers and contractors in an open, direct and accurate manner.
- To decide with objective criteria in the selection of suppliers and contractors, and
- To comply with reasonable privacy and work safety rules required by the supplier, during the supplier and contractor audits and visits.

### 2.2. Relations with the Shareholders

- To protect the rights and interests of its shareholders defined by law,
- To show maximum efforts in order for the creation of value in exchange for the resources provided by the shareholders, and distribute the profit to the shareholders or direct the profit to the investments, and
- To ensure that the companies are managed within the framework of the principles of trust and honesty that have been going on since the establishment of Efesan Grup, and to manage the resources, assets and working time of our companies with efficiency awareness by targeting sustainable growth and profitability.

### 2.3. Relations with the Government

- To comply with all applicable laws, rules and regulations in the countries, where Efesan Grup is in operation and in the countries, where Efesan Grup is to operate, and
- To manage, record and report all business activities and the accounting system fully and appropriately according to the law.

### 2.4. Social Responsibility

- To support the studies that will contribute to the economic and social development, and
- To show sensitivity to the issues concerning the society and provide support for the positive development of the society.

### 2.5. Customer Relations

- To create value for customers, meet their demands and requirements at the highest level,
- To provide quality products and services, and pursue stable policies,
- To establish a long-term environment of trust in relations with customers,
- To aim to be the first choice by increasing the customer satisfaction in sales and after-sales process, and
- Not to give misleading and incomplete information to customers,

### 2.6. Competitors and Competition Relations

- Not to enter into any agreements and not to show any concerted practices, which are intended to directly or indirectly impede, disrupt or restrict the competition, with or against competitors or other persons or organizations, in any manner whatsoever, except for the limits permitted by the legislation,
- Not to exploit its dominant position, in cases when it is in a dominant position in a particular market either alone or together with other enterprises,
- Not to conduct any negotiations and exchange information with competitors in order to jointly dictate market and/or competition conditions. To avoid any kind of conversations and transactions that may lead to the above-mentioned situations in any meetings attended on behalf of the company, such as the meetings of unions, assemblies, chambers, professional associations, etc., and other private or professional meetings and talks, and
- Business partners shall comply with the relevant national and international laws to maintain fair competition. This shall include in particular the provisions for unfair competition and antitrust laws.

### 2.7. Global Responsibility

#### 2.7.1. Environmental Protection

- To develop Efesan Grup's environmental policies, and ensure their effective implementation, and
- To act with the consciousness of environmental protection for Turkey and the world, and spread this consciousness.

#### 2.7.2. Global Compact

To act for the benefit of our country and the world in accordance with the principles set forth by the United Nations Global Compact, and set a corporate citizenship example together with our employees and our suppliers.

## 3 Ethical Codes of Conduct Required to be Complied with by the Employees

The association of the "Efesan" name with the professionalism, honesty and trust and its further advancement is the primary responsibility of all Efesan Grup employees. In this context, the following are expected of Efesan Grup employees:

- To always abide by the law,

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- To fulfill own duties within the framework of basic moral and human values,
- To act in a fair, well-meaning and understanding manner in order to achieve mutual benefits in all relations,
- Not to derive any unjust benefits from any individuals and organizations, accept bribes or pay bribes, for any purpose whatsoever,
- To act in the sustained tasks in accordance with all relevant business ethics rules and all codes of practice supporting these rules,
- Not to make any declaration, statement or correspondence that would put the company under any commitment, unless expressly authorized.
- Not to behave in a way that disturbs and/or harm other employees, not to disrupt the workplace harmony,
- To be attentive to all tangible and intangible assets of the company, including its information and information systems, as if they are own personal property, protect them against potential losses, damages, misuse, misappropriation, theft and sabotage,
- Not to use the working time and company resources directly and indirectly for personal gain and/or political activity and interests,
- To base on continuous development, participation, transparency, impartiality, honesty, accountability, trust in expression, and observance of the benefit of Efesan Grup,
- To facilitate the daily life through working life, meet the needs in the most effective, fast and efficient way and improve the service quality, and
- Not to use or let anyone use the property, buildings and vehicles of Efesan Grup other than for the purpose of the service requirements.

### **3.1. Asset and Information Management**

#### **3.1.1. Intellectual Property Rights**

- To ensure initiation and completion of the transactions in a timely manner as stipulated by the law, in order to secure the intellectual property rights in respect of the newly developed products, processes and software, and
- To avoid the - intentional - unauthorized use of other companies' patents, copyrights, trade secrets, trademarks, computer programs or other intellectual and industrial property rights.

#### **3.1.2. Information Management**

- To ensure that all legal records are kept in a healthy manner,
- Not to respond to the information requests received from third parties and which fall under the category of confidential information for the company, without the approval of the senior management, and
- To show due diligence in order to ensure that the statements declared and reports presented by the company are realistic.

#### **3.1.3. Security and Crisis Management**

- To take the necessary measures to protect the company's employees, information and information systems, factory and administrative facilities against possible terrorist acts, natural disasters and malicious initiatives,
- To carry out the necessary crisis planning in relation to the emergency crisis management that is to be formed in case of a terrorist act, natural disaster, etc., and in this way to ensure the continuity of the business with minimum loss, and
- To take any and all measures to prevent theft or loss of company assets.

### 3.1.4. Confidentiality

- To act with the awareness that the financial and trade secrets of Efesan Grup, the information, which would have weakened Efesan Grup's competitiveness if it had been disclosed, the rights and information of the Efesan Grup's personnel, and the agreements executed with the business partners fall within the framework of "confidentiality", and to ensure the protection and confidentiality of such information,
- Not to share the information learned and the documents possessed pursuant to the nature of work with the unauthorized persons and authorities inside and outside the organization for any purpose whatsoever, and not to use such information (directly or indirectly) for speculative purposes, and
- Not to use the non-public information about the companies that are being dealt with and their customers as well as the non-public information about other persons and companies that the said companies deal with, for any purpose other than the foreseen purpose, and not to share such information with third parties without obtaining the necessary permissions.
- Our suppliers shall protect the confidential information provided to them by Efesan Grup. Confidential information may only be used and disclosed as permitted by Efesan Grup. Confidential information shall mean any commercial information that is not open to public about Efesan Grup's customers and business partners.
- Our suppliers shall protect the intellectual property of Efesan Grup such as patents, trademarks, copyrights, designs, trade secrets, models and technical information.

### 3.2. Avoiding Conflicts of Interest

Conflict of interest shall refer to any and all benefits which are provided to the employees, to their relatives, to their friends or to the persons or organizations with whom they have relations, and which impact or may impact the performance of their duties in an impartial manner, and to the fact that the employees have any material or other personal interest in relation to them, their relatives, their friends or the persons or organizations with whom they have relations. Our suppliers shall ensure that their own and their employees act, and make their decisions independently of any conflicts of interest and other unnecessary matters in respect of their business relations with Efesan Grup.

#### 3.2.1. Not making a transaction for own favour or for the favour of kinsmen (Avoiding Nepotism)

- Not to take advantage of title and authority in an unfair manner in own favor, in the favor of relatives or any third parties,
- To be attentive in personal investments to be made not to fall into a conflict of interest situation with the current institution of employment,
- To pay attention that the personal investments to be made or any activities to be involved outside of business activities do not interfere with the fulfillment of any currently ongoing duty in Efesan Group in terms of allocation of time and staying focused, and to refrain from the occurrence of such situations that prevent focusing on the main tasks,
- To notify the immediate supervisor in the event that the employee and the person, who is working at the primary level of decision-making in respect of the same business at hand at the company that is in the position of a customer or a supplier with respect to Efesan Grup have an immediate family relationship,
- Employees have to notify, if any, the fact that they have shares in another company or that they have participated in their investments, during their recruitment. Particularly this issue is questioned in the job interviews to be held with the candidates. Employees shall report any changes that may occur in their status with respect to the said matter and any other matters that may be perceived as conflicts of interest to their immediate supervisors, and such a situation shall be notified within the hierarchical structure to a supervisor, who is at least two levels higher in hierarchy.

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- To notify the immediate supervisor in the event that it has been learned that any member of the immediate family has shares or material benefits in a company with which Efesan Grup has a commercial relation.

### 3.2.2. Representation and Participation in Events

- Participation in activities and events organized by individuals or organizations, with whom Efesan Grup has a business relation or who have the potential to have a business relation with Efesan Grup, such as sporting activities, domestic/international trips, etc., which impact the decision-making process or which may be perceived as having impacted the decision-making process, other than conferences, receptions, publicity events, seminars etc., which are open to general participation, shall be subject to the approval of the General Manager in case of Group companies, and to the approvals of the President/CEO/Director in case of the Group.

### 3.2.3. Accepting/Giving Gifts

The principles regarding the prevention of potential conflicts of interest during the course of conduct of relations held with private or official persons and organizations, who wish to establish or maintain business relations with Efesan Grup are as follows:

- Not to accept any gifts that may lead to dependency relationship or which may be perceived as having led to such relationship, and to kindly return such promotional materials and gifts in case they had been accepted, other than the materials that do not exceed 50 Euros in worth and given in accordance with the commercial traditions, manners and customs, which do not leave the impression of an irregularity and which have the nature of a souvenir/promotional material.
- Not to give any gifts or promotions to the companies and persons, whom are being dealt with, apart from the gifts, promotions and amenities which do not exceed 100 Euros in worth and give the impression of an irregularity.
- Not to claim any discount or benefit from suppliers, customers, Group companies or third parties that may be perceived as inappropriate, not to offer such discounts or benefits to third parties, and not to accept such discounts or benefits when offered.
- Not to request or accept any support for holiday, education, sports and leisure activities from any person or organization that conducts business with Efesan Grup.

### 3.2.4. Doing Business with Individuals Who Cease to be an Employee of the Group

Doing business with the Group Companies, either by personally establishing a company or by going into a partnership, after having left his/her position in the company, in the capacity of a seller, contractor, consultant, broker, agent, dealer or similar forms, is a very important issue to pay attention to as it may create negative perceptions.

It is necessary to act within the framework of the interests of the Group before or after such a process, to comply with ethical and moral principles, and not to allow conflicts of interest before and after the process.

In the event that there is a supplier in such situation, the relevant manager shall contact the Group Company, where the supplier has worked before, and prepare a report stating that there is no inappropriate situation and inform his/her immediate supervisor.

In the event that an inappropriate situation exists, a commercial relationship shall not be established with the person concerned.

Apart from the exceptional cases, which require the approvals of the CEO/Director/General Manager, it is necessary not to approve the establishment of commercial relations with former employees of the Group, no earlier than 2 years after the employees have left the Group, in order to prevent the formation of any negative perceptions.

### 3.2.5. Insider Trading

It is necessary for the employees to know that trying to gain any commercial interests (insider trading) by using any confidential information belonging to the company and the Group, where the employee works, is a legal crime, and to absolutely not to attempt insider trading.

### 3.3. Occupational Health, Safety and Environment Rules

- To comply with the rules set forth, in the laws, Efesan Grup instructions and procedures, and Occupational Safety and Environment booklet,
- To protect natural resources, use them in the most efficient way, reduce wastes at the source, and support recycling,
- To protect the environment and ensure the continuity of the management system,
- Not to keep any item or article in the workplace that poses a danger to the workplace and/or employees or which is of illegal nature, and
- Not to keep any drugs, addictive substances, or any substances that restrict or eliminate mental or physical faculties, in the workplace, and not to work while under the influence of such substances, in the work place and within the scope of a work.
- Suppliers shall ensure the protection of occupational safety and health in their workplaces in accordance with the legal provisions. Business partners shall set up instructions and procedures for the protection of occupational safety and health, and subject these instructions and procedures to continuous improvement in order to prevent accidents and work-related diseases.

## 4 Employer's Commitments

### 4.1.1. Not to Utilize Child Labour

The Efesan Grup opposes the use of child labor, complies with the relevant laws and regulations and act consistently with the Minimum Age Convention (ILO Convention No. 138). Except for the training and apprenticeship programs approved by the official authorities, persons under 18 years of age shall not be employed. It is strictly forbidden also for our suppliers to use child labor.

### 4.1.2. Not to Utilize Forced Labour

The Efesan Grup complies with the prohibitions imposed on any form of forced labor, exploitation or slavery. Disciplinary measures based on physical and mental suffering shall not be allowed. Our suppliers shall also comply with this rule.

### 4.1.3. Non-Harassment and Non-Discrimination

Efesan Grup provides equal opportunities for employees. The official language of the working environment shall be Turkish.

The diversity of the employees and partners of our Group is one of the company's greatest resources, and Efesan Group is committed to providing a business environment that is free of discrimination and harassment.

Our Group remains strictly committed to offering equal opportunities in all aspects, and shall not accept any discrimination, harassment or intimidation, including but not limited to any discrimination, harassment or intimidation based on color, religion, gender, ethnic origin, age, disability, political opinion, marital status, sexual preference or family responsibilities.

Our Group supports the reputation of all its business partners, employees, managers, agents and representatives and shall not accept any sexual, coercive, threatening or exploitative behavior (including gestures, verbal or physical contact).

Any employee or business partner who has information about a possible violation of these issues shall immediately notify the Efesan Human Resources Directorate. Efesan Grup fights all forms of corruption, including bribery and discrimination.

Our suppliers shall oppose all forms of discrimination in accordance with the applicable rights and laws. This shall apply in particular to the discrimination against employees based on gender, race, disability, ethnic or cultural origin, religion or belief, age, sexual orientation or other personal characteristics.

### **4.1.4. Payments and Protection of Rights**

The payments and personal rights of the employees of Efesan Grup shall be carried out fully and accurately. Efesan Grup gives its employees their wages and rights in accordance with the applicable laws and in a timely manner.

Suppliers shall comply with all laws governing wages and working times, including minimum wages, overtime work and other items subject to remuneration, and ensure that their employees fully receive the social rights to which they are entitled to by law or through contract.

### **4.1.5. Ensuring Regular Employment and Observance of Working Hours**

In our Group, attention shall be paid to the employment of appropriate number of employees as necessitated by the workload, and not to go out of working hours and the use of regular leave is checked. The utmost care shall be taken to ensure that the right personnel are assigned to the right job.

Suppliers shall not ask their employees to work more than the maximum hours permitted by law.

### **4.1.6. Respecting Right to Freedom of Speech and Right to Association**

Our Group respects the right of its employees to participate in a union, to form a union or not to join a union, without fear of retaliation, intimidation or harassment, and complies with all applicable local and national laws regarding freedom of association and the right to collective bargaining. Our Group supports the full provision and protection of freedom of thought and expression. Employee interests shall be respected in our Group.

Suppliers shall respect their employees' rights of association, as provided for by the applicable laws.

### **4.1.7. Occupational Health and Safety**

Our Group aims to ensure full occupational health and safety at work and on-the-job. The employees shall act in accordance with the rules and instructions set for this purpose and take the necessary measures.

Efesan Grup provides its employees with a working environment that meets or exceeds the safe and healthy, clean and up-to-date occupational safety standards.

### **4.1.8. Environmental Protection**

- Efesan Grup works in compliance with the "Environmental Management System" and ISO 14001: 2015 Standard, avoids the works and operations that would create environmental pollution, observes the use of national and international resources in the most feasible way, and strives for the continuous development of environmentalist working procedures and objectives.
- Efesan Grup supports the preventative approaches against environmental threats, and takes steps for the promotion of a more effective environmental responsibility and the development of environmentally friendly technologies.
- Efesan Grup aims to protect natural resources, use them in the most efficient way, control possible environmental impacts, reduce the waste at the source, and recycle them.
- Our suppliers shall adhere to the goal of protecting the environment for present and future generations. Our suppliers shall comply with the applicable laws to protect the environment. Our suppliers shall use the natural resources with due diligence and require their employees to act with environmental awareness. Our suppliers shall work to make their products as convenient as possible for reuse, recycling and safe disposal.

### **4.1.9. Prohibition of Political Activities**

Group companies shall not make any donations to political parties, politicians or political candidates. In such matters, demonstrations, propaganda and activities having similar purposes shall not be allowed within the boundaries of the workplaces. Company resources (such as vehicles, computers, e-mails) cannot be allocated to political activities.

## 5 Ethical Codes of Conduct Codes of Practice

### 5.1. Obligation of Notifying Violations

In the event that the employees have become aware or have suspected of violations to the Ethical Codes of Ethics of the Efesan Grup or of the Company or to the laws and regulations, which the company is subjected to, they shall be obliged to report such a violation to their senior manager (immediate supervisor) or, as appropriate, to the GM and/or to the CEO/Director to whom they are subordinated.

The disclosure of a declaration made by the person in a way that adversely affects the peace of the workplace or business relations, to the third parties shall absolutely be prevented.

It shall be ensured that the notification mechanism is for the benefit of the company.

It is very important that the notifier is free of intentions such as gossiping about the person subject to the notification or trying to negatively affect the career of the person subject to the notification. In this respect, it is of critical importance to comply with confidentiality, objectivity and ethical rules in the notification and investigation process. It is mandatory for both the notifier and the person who manages the process to pay utmost importance and attention to this issue.

Malicious notifications having the nature of lie and/or slander shall be interpreted as an ethical rule violation, when detected.

### 5.2. Sources to Report Violations

Efesan Grup employees shall be able to report possible violations of the Ethical Codes of Conduct or Supplier Ethical Codes of Conduct, which may impact the Efesan Grup, to the email address of [etik@efesan.com.tr](mailto:etik@efesan.com.tr) (which is also applicable for the suppliers and their employees) either anonymously or by providing their names. The e-mails sent to this address shall reach the Chairman Of The Board, General Manager and Human Resources Director directly. In addition, such violations can be reported also through the following phone numbers of the ethics hotline, (0262) 653 42 60-2425-2457.

Violations shall be evaluated by Human Resources executives together with the company lawyers, and reported to the Business Ethics Committee. The Business Ethics Committee shall convene within one day of the detection of the violation, and decide on the matter.

### 5.3. Business Ethics Committee

Efesan Grup Business Ethics Committee shall consist of CFO, Human Resources Director, Relevant General Manager/Operations Manager and company lawyers. Human Resources shall follow up and maintain the results and records of the decisions taken by the Committee.

### 5.4. Disciplinary Actions

The following disciplinary actions shall be implemented upon the violations of Ethical Codes of Conduct:

- In case of a deliberately committed misconduct, dismissal (in accordance with the relevant articles of the labor law) and initiation of a legal action if deemed necessary. The beneficial works done in the past by the person, who has deliberately derived improper benefits, may not constitute a reason for a pardon, in whole or in part, on the decision that has been taken.
- If there is no misconduct or if there is a negligence due to carelessness or ignorance, a verbal or a written warning shall be issued that is appropriate to the effect of the incident.