

## **AKMERKEZ GYO A.S. – ETHICAL PRINCIPLES**

Akmerkez GYO A.Ş. deems loyalty to the Ethical Principles is a prerequisite for all its studies and considers it as one of the key stone of its institutional culture. Honesty and trust, sense of responsibility and respect to the rights are essentials of the company regarding its relationships with its employees, partners, suppliers, customers, agencies, other beneficiaries and public as well.

All employees including members of the Board of Directors and managers of the Akmerkez GYO A.Ş. are expected to obey the below specified ethical principles, while they perform their tasks.

### **Ethical Principles of the Akmerkez GYO A.S.**

#### **Honesty, Trust and Equality**

- Development of fiduciary relationship, consistence, honest behavior and communication with all people and institutions that have business relationship is the main principle.
- Honesty and trusting each other regarding all relationships and processes in and out of the institution is fundamental.
- The company provides a healthy and safe working environment and career development basis based on equal opportunities.
- The Company does not discriminate among its employees and treats equally and fairly.
- Employees do not behave disturbingly and harassingly against the other employees and third persons that they have had relation.

#### **Responsibility**

- The Company takes pains in order to pull one's weight against its customers, employees, suppliers and business partners, competitors, environment and community.
- Employees strictly distinguish their beliefs, world-view and political evaluations from the working environment as well as their tasks and responsibilities that they are obliged to fulfill.
- Employees are responsible to protect the title and prestige of the Company by strengthening and to use its resources productively. They avoid any appearance, behaves and actions that can damage this responsibility and put the Company in trouble.
- Employees are conducts consciously and under responsibility to produce more than they have consumed and to economize when they fulfill their tasks.
- Importance is attached to share the values, which were created during the company activities, with the country and community. Donations that were granted and social responsibility projects that were supported in this context are announced to the community.

#### **Confidentiality**

- Confidentiality and privacy or all commercial and personal information regarding the Company, employee and customer are fundamental.
- Employees are conscious of the confidentiality of the private information about the Company, other employees and shareholders, which are not open to the general public, and

they are obliged to keep them confidential. Such kind of information is used only when required by professional purposes of the business and task in accordance with the law and legislation and is shared only with the persons, who are authorized regarding the said issue.

- Whether or not they are related with the task that she/he performs, the employee cannot provide or disclose any kind of secrets, confidential information, data regarding intellectual property rights and related documents of them to any of her/his family member as well as any unauthorized persons and authorities out of the Company. This obligation remains in force even relation of the employee with the Company has been terminated.

### **Conflict of Interest**

- Employees fulfill their tasks by staying away from conflict of interest and in the direction of accountability and transparency. Self-interests and situations that their interests can inflict with the Company or related persons and institutions are observed and prevented.
- Employees do not enter into borrowing and lending relationships with the parties that they involve with their tasks directly or indirectly, do not accept any interest granted to her/him, and do not use title of the Company in order to gain personal advantage.
- Employees value interests of the institution above anything, when they fulfill their tasks and avoid any kind of actions and behaves that can be considered as gaining advantage for herself/himself or her/his relatives by using title of the Company.
- Employees do not give or accept bribe, when they perform their works with the third persons. Exorbitant hospitality is not shown, presents, gifts are not accepted or given.

### **Conformity with Law and Regulations**

- The Company performs its activities in accordance with Ethical Principles, law, code, legislation and regulations, with a sustainability understanding and complying with natural life and public health as well as by respecting environment. Employees conduct in the light of these principles as well.
- The Company and its employees avoid any kind of behaves that damage free and fair competition. They compete efficiently only within legal and ethical areas; initiatives that serve fair competitor structure in the business life are supported and encouraged by avoiding unfair competition.

### **Keeping of the books and records:**

- Keeping of the Company books and records properly and accurately is fundamental.
- Any kind of report, presentation, financial statement and footnotes that will be disclosed to the Community and submitted to the competent authorities by the Company are prepared timely, completely, accurately, understandable and transparent in accordance with the intercorporate regulations and ethical principles and they are retained as well.