

Business Ethics Guideline

Our Code of Conduct

We build our business on trust.

GÜLER DİNAMİK must be recognized as a reliable and trustworthy company that performs its activities properly and ethically.

We are innovative in our desire to exceed expectations.

When it comes to the culture of business conduct, including adaptation of sectorial business ethics, GÜLER DİNAMİK must be the one that determines trends.

We are universal company and we embrace diversity.

GÜLER DİNAMİK is a company that attaches importance to differences, that encourages diversity in an exhaustive way and that conforms to the principles of universal business ethics.

We value sustainable results.

GÜLER DİNAMİK exhibits sustainable financial results, and provides a healthy and safe working environment and an attractive business place to our employees.

We produce our services under suitable social and environmental conditions, and we are engaged in dialogue with our stakeholders in order to understand their expectations.

We believe in global corporate citizenship.

GÜLER DİNAMİK believes in the balance between financial, environmental and social results.

Message from the Chairman of the Board

We are all representatives of GÜLER DİNAMİK!

GÜLER DİNAMİK is recognized and known for the fact that it provides unique, creative, sustainable services and solutions to our customers. It is of great importance for us to achieve financial results by adhering to the principles of business ethics for the purpose of improving our position in global markets and to preserve our reputation.

That is to say, it may be recognized when we become successful and make a mistake.

It is not sufficient to ensure that our services and solutions are sustainable; our conducts must also be sustainable.

The name of GÜLER DİNAMİK must always be mentioned with various concepts, such as respect to human rights, suitable working conditions, sensitivity to social and environmental issues etc. Our decisions and activities must reflect the fact that GÜLER DİNAMİK works continuously to improve its services for the benefit of our customers, stakeholders and environment.

No matter where you are working within the body of administrative and commercial functions of the company, you are the representatives of GÜLER DİNAMİK.

Therefore, we expect you to act in a serious spirit that reflects your professionalism and that shows respect to all people and cultures. If you are an executive, you must set a good example for your employees and you must guide and help them in adhering to the values and policies of GÜLER DİNAMİK.

Our employees are coming across with various situations, in which they have to take critical decisions in terms of the reputation and businesses of GÜLER DİNAMİK. We know that our employees do the right thing in most of these cases. However, dilemmas may be

experienced in cases where it is difficult to make an assessment on what the right decision should be.

In the GÜLER DİNAMİK Business Ethics Guideline, you may find ethical principles that constitute the essence of our company. This guideline shall provide you assistance for leading a life consistent with our values and policies. You may ensure that GÜLER DİNAMİK stands behind your decisions by acting in conformity with this guideline.

Yours Respectfully,

Kenan Güler
Chairman

Preamble

Business Ethics Guideline summarizes the ethical principles of GÜLER DİNAMİK in general by dividing ethical principles in three main sections:

- GÜLER DİNAMİK and our employees
- GÜLER DİNAMİK and our foreign partners
- GÜLER DİNAMİK and society

This guideline is a reference point and its table of contents provide general information on assessed issues.

These principles are prepared in order to provide guidance to all of the employees and representatives of GÜLER DİNAMİK, including any affiliates and joint ventures, in which GÜLER DİNAMİK is the majority shareholder.

GÜLER DİNAMİK Business Ethics Guideline may only be used for intercompany purposes.

It is beyond doubt that there are certain dilemmas and questions that are not answered clearly in this guideline. In this case, please contact your manager, your ethics and adaptation supervisor or Ethics Committee, who provide consultancy services and support on ethical dilemmas related with work.

Getting opinions, consulting and asking for help shall be the first and most critical step you shall take to not to endanger the reputation of GÜLER DİNAMİK.

Below you may find the answers to general questions.

Who must conform to ethical principles?

Everybody, who is employed within the body of GÜLER DİNAMİK, must conform to our ethical principles. These principles apply to any employees, managers, interns and representatives on equal terms. Also, if you are a manager, you shall be particularly liable to ensure that all of our employees understand our principles and to be aware of and understand the expectations of GÜLER DİNAMİK in terms of correct behaviour.

What happens if I violate ethical principles?

You must not participate to any activity that may damage or overshadow any interests or reputation of GÜLER DİNAMİK.

Only you are responsible for your behaviours, and if you prefer to not to consider our ethical principles, GÜLER DİNAMİK may terminate your labour contract.

What should I do if I have doubts on ethical principles?

If you have doubts whether you are acting accurately or not, you may complete the ethics test below.

Also, we collected the Questions and Answers in the business ethics training set of GÜLER DİNAMİK in order to explain the typical situations and dilemmas that are related with your decision-making processes and behaviours and that you must consider particularly. Herein you may find the answers to your questions in full.

If you still have doubts on how to interpret ethical principles, you must consult to your manager or you must contact Ethics Committee.

How may I notify any violation of ethical principles?

If you recognize any situation that conflicts with the ethical principles or that may give damage to GÜLER DİNAMİK in anyway or that may damage the reputation of GÜLER DİNAMİK, you must act immediately. You must contact your manager, your ethics and adaptation supervisor or you must contact the Ethics Committee through our intranet.

Please obtain information on how you must use Ethics Line in case of any violation.

How can we establish a balance between local laws and ethical principles?

Any business units, departments and employees that are available within the body of GÜLER DİNAMİK must conform to all of the local laws that we are subjected to.

In cases where the ethical principles of GÜLER DİNAMİK are stricter than the local legislation, Business Ethics Guideline must be followed. If you become aware that there are conflicts between the local legislation and our ethical principles, you must contact your manager, your ethics and adaptation supervisor or Ethics Committee.

Ethics test

How can you complete ethics test?

If you are not sure whether you acted ethically or not, you must ask below four questions to yourself. If you answered "no" to one or several questions, you must abstain from performing below actions.



Do I conform to the laws, relative regulations and rules?



Is the decision I made conforms to the ethical principles and policies of Güler Dinamik?



Am I being loyal to Güler Dinamik? Does my behaviour include any potential of giving damage to my company?



Would I feel uncomfortable if I read in the newspapers about the situation that may occur as a result of my decision?



How would I feel if my family and friends heard about my decision and results that may occur consequently?

What is the relationship between ETHICAL Principles of GÜLER DİNAMİK and UN Global Compact?

GÜLER DİNAMİK has participated to the initiative of UN Global Compact that is comprised of ten good corporate citizenship principles. These principles constitute a framework for our works on human rights, employee rights, and fight against environment and corruption. Therefore, these principles are included to GÜLER DİNAMİK Business Ethics Guideline and GÜLER DİNAMİK's Code of Conduct for Suppliers.

GÜLER DİNAMİK's Code of Conduct for Suppliers explain the conditions related with the social and environmental responsibility of our suppliers.

How did the need for ethical principles emerge?

Our ethical principles are based on the values of GÜLER DİNAMİK and requirements that are stipulated in international declarations, conventions and statements, e.g. UN Global Compact and basic agreements executed by International Labour Organization (ILO) in relation with employee rights.

Why human rights are under the responsibility of companies as well?

We are engaged in global markets and we are providing services to multinational companies, and therefore, GÜLER DİNAMİK may be engaged in business activities, in which human rights are denied. It is the duty of any government to protect its people from any human rights violations. However, as a company with social responsibility, GÜLER DİNAMİK must promote showing respect to human rights. We must make sure, in our business activities and in our business decisions, that we are not connected with any violation of Human Rights and that we use our influence to protect the pride of entire humanity.

How may I use Ethics Line in case of any violation?

You may visit intranet (www.gulerdinamik.com/etik).

Your notification shall be assessed in strict confidence at all times.

You may prefer to not to submit your name.

Concerns that are indicated in good faith shall never be left unanswered.

All issues shall be treated professionally without considering the status of notified issue.

Ethics and adaptation supervisor and Ethics Committee, who are liable to follow ethics cases, shall follow notifications at all times.

GÜLER DİNAMİK and Our Employees

The way we interact

GÜLER DİNAMİK expects from our employees to work honestly and to be respectful to each other.

GÜLER DİNAMİK shows respect to the right of employees to express themselves freely and encourages open communication and constructive feedbacks between managers and employees.

We believe that different opinions and experiences shall contribute to development of innovative solutions that may make of competitive in global markets.

Below basic principles apply to all of our employees:

- You must treat honestly and equally to your co-workers.
- You must not refrain from suggesting new ideas for solving any problems related with business activities.

Working Environment

According to GÜLER DİNAMİK, it is one of the prerequisites of providing a set of solid and effective work results to provide a good and secure working environment, in which the employees may work without being injured or without getting sick.

By working environment, we refer to any physical, chemical and psychological conditions that effect the health and well-being of employees working in the business place. For example, we are working forehandedly in order to prevent problems that may occur in the working environment by minimizing usage of any materials that may damage people or environment.

Below basic principles apply to all of our employees:

- You must be aware of any information related with the security of working environment and business place and you must ensure that you are kept updated on such issues.
- You must follow the security instructions that you received.
- You must use any necessary personal protective equipment while performing your work.
- You must not subject yourself or others to any unnecessary physical or psychological stress.
- You must make contribution to determination of the reasons of occupational accidents, and you must participate to the process of preventing repetition of the same.
- You shall be responsible for creating a mild working environment.

Below basic principles apply to managers:

- You must ensure that your employees receive training and conform to any conditions related with the working environment and its security.
- You must determine continuously any need for extra trainings, which are proven to be required in order to maintain high level of security.
- You must ensure that your employees are notified continuously on learning points that may prevent occupational accidents.
- You must take measures against issues that may create a negative working environment.

Discrimination

GÜLER DİNAMİK, who shows respect to cultural differences, treats to any of its employees in a way compatible with human dignity, and expects from any of its employees to display the same level of sensitivity.

Discrimination in business place may never be accepted and it is our priority to ensure that the employees do not face any unjust discrimination.

It is critical for the development of GÜLER DİNAMİK to ensure that all of the employees have the opportunity to improve their potentials. Any discrimination in business place shall eliminate such opportunity.

Below basic principles apply to all of our employees:

- You must not participate to any activities, such as physical violence, discrimination and abuse etc., due to sex, age, nationality, ethnical origin, religion, sexual orientation, disability or political opinion. Also, it is not acceptable for you to talk in a way to offend others.
- In case you or others are subjected to discrimination, you must intervene in the incident or you must contact the **Ethics Line**.

Below basic principles apply to managers:

- You must ensure that all of your employees are treated equally and that all of your employees are assessed according to their qualifications and performances.
- You must not consider any data related with sex, age, nationality, ethnical origin, political opinions and disability status during implementation of procedures related with employment, salary adjustments, career opportunities, advanced training or personnel deductions, except for cases where these issues are considered for implementation of any positive activity for providing diversity in the business place.

Employment and right to privacy

GÜLER DİNAMİK respects to the right to privacy of employees. This right applies during recruitment and employment process of both our current employees and new employees. We are endeavouring to conform to any rules related with protection of personal data.

Below basic principles apply to managers and HR personnel:

- Personal information of employees must only be recorded for work purposes, and such information must be processed and maintained securely and in accordance with legal provisions. You must respect to the right of all of the employees to read their own personal information.
- You must ensure that GÜLER DİNAMİK only requests the medical tests that are absolutely necessary or that are required from employees in particular, and you must not use medical tests for any discriminative purpose.
- You must not question the medical status of any applicant, unless it is required in connection with work performance or security or unless it is necessary for conforming to relative legislation. Also, you must not ask any private questions to the applicant about his/her family, including any questions about the applicant's private life, political connections, sexual orientation and religion or pregnancy.
- In case you hire a recruitment consultant, you must inform the consultants on the aforementioned principles related with protection of personal data and usage of medical tests.

Forced labour and employment conditions

GÜLER DİNAMİK does not tolerate any forced labour or any other form of involuntary labour. We respect our employees right to establish a healthy balance between working hours and spare times, and we conform to the conventions of International Labour Organization (ILO) in this respect.

Below basic principles apply to managers and HR personnel:

- In order to reveal explicitly that the employees are working voluntarily, you must ensure that the employees have a labour contract and are included to the scope of the written conditions that state conditions for termination.
- You must ensure that the new labour contracts or other written labour conditions include conditions that require from the employee to conform to the ethical principles of GÜLER DİNAMİK.
- You must ensure that the salaries, including overtime fees, are consistent with the local legislation and contracts.
- You must abstain from making any deduction from the salaries of employees as a means of disciplinary penalty, except for the cases where the employees violate critical business instructions (e.g.: security rules) advertently and where the effect of any written warning is very limited. Salary deductions must be considered as a last resort, and must be imposed to a certain extent, and monthly wage must never be lower than minimum salary.

Child Labour and Employment of Youth

GÜLER DİNAMİK respects the right of children to development and education. Therefore, we do not tolerate child labour.

Below basic principles apply to managers and HR personnel:

- In case you employ youngsters and children aged between 15 and 18, you must assure that these youngsters and children are above the local minimum working age and local obligatory education age. Also, children must not be assigned to any hazardous work, must not work at nights and must give more breaks than the employees aged above 18.

Confidential Information

The trust relationship between GÜLER DİNAMİK and its employees requires any confidential information to not to be disclosed to unauthorized persons. Confidential information refers to any information that may not be accessed by any third party, that are of importance in respect of the business of GÜLER DİNAMİK and/or that may not be disclosed to any third party legally without obtaining prior approval. Information related with GÜLER DİNAMİK's strategies, technologies, products, prices or business partners shall be considered as confidential information.

Below basic principles apply to all of our employees:

- You must not use any confidential information of GÜLER DİNAMİK for personal purposes.
- You must not disclose confidential information of GÜLER DİNAMİK to any persons, who are not employed within the body of GÜLER DİNAMİK.
- You must not disclose any confidential information related with business partners to any third parties.
- You must ensure that third parties may not access to any information you maintain (e.g.: any information maintained in your computer, telephone or among your documents).

GÜLER DİNAMİK provides electronic communication tools to its employees in connection with its business activities. These tools may be used for personal purposes as long as they are not used excessively and as long as they do not effect the work of relative employee.

Below basic principles apply to all of our employees:

- You must use the means of communication only for approved purposes, and you must conform to the Information Security policies and good Information technologies practice principles of GÜLER DİNAMİK.
- You must not use the means of communication provided by GÜLER DİNAMİK (such as the mail address provided by the company) in order to make donation or to make payments for your personal expenditures.
- You must not use the means of communication provided by GÜLER DİNAMİK in order to manage your personal affairs and relations.
- You must not use the means of communication provided by GÜLER DİNAMİK for any conversations that are illegal, offending or threatening or that violate any copyrights, trademarks or right to privacy of any person.
- You must not distribute any information that may establish a cold environment or an inefficient business place.
- You must not distribute any chain letters, computer viruses or any other materials that may disturb others or that cause others to incur costs.
- You must protect any information (e.g.: passwords) that is used to access to the systems of GÜLER DİNAMİK.
- If you suspect that a violation that may threaten the information system of GÜLER DİNAMİK in terms of the security of Information Technologies, you must contact Information Technologies Directorate immediately.

Alcohol and drugs

GÜLER DİNAMİK wishes to be a healthy and secure business place. In case you suspect that the conditions related with any working environment or security are violated as a result of usage of alcohol or drugs, you are entitled to make relative investigations.

Below basic principles apply to all of our employees:

- Unless it is related with any celebration or any similar event that is approved by the Management, no alcohol must be consumed or you must not be under the influence of alcohol during working hours.
- You must not use drugs or other prohibited materials, you must not be under the influence of drugs or other prohibited materials or you must not encourage others to use drugs or other prohibited materials.
- GÜLER DİNAMİK respects the privacy of its employees; furthermore, if you are sentenced in your private life due to usage of any illegal materials, we would like to remind you that you may face sanctions that may result in termination of your labour contract.

Theft and fraud

It is not tolerated in the business place to be engaged in any type of fraud or to abuse of the name, products, articles or information of GÜLER DİNAMİK, and any activity on the contrary may result with termination of employment and legal procedures.

Below basic principles apply to all of our employees:

- You must not abuse the credit cards or cash fund provided by GÜLER DİNAMİK.
- You must not deceive GÜLER DİNAMİK in relation with travel, working hours or holiday records.
- You must not add any fake expenditure to your account, you must not increase your expenses advertently or you must make GÜLER DİNAMİK to pay any of your special expenditures.
- You must not use the letterhead stationary of GÜLER DİNAMİK or the name or trademark of GÜLER DİNAMİK for any personal or unauthorized objectives.
- You must not obtain the articles of GÜLER DİNAMİK wrongfully or you must not take these articles out of the company building without obtaining written approval of your manager.

- You must not copy any of the materials that are protected with copyrights and that require licenses (including software).

Politics

GÜLER DİNAMİK does not find it suitable to support any specific political party or the interests of any political party. However, management of GÜLER DİNAMİK may approve being a member of any institutions that are engaged in business activities within the framework of the agreements (e.g.: UN Global Compact) that are signed by GÜLER DİNAMİK Group or associations that work for the benefit of public in areas that are not approved by the board of directors.

Below basic principles apply to all of our employees:

- You must not use the name or trademark of GÜLER DİNAMİK for political activities.
- You must not share your personal political opinions by using letterhead stationeries provided by GÜLER DİNAMİK or by using the e-mail address provided by GÜLER DİNAMİK.
- You must not donate any money to political parties or you must not provide any other type of support in the name of GÜLER DİNAMİK.
- In case you participate to any political activity in person, you must not use any of the articles that carry the name or trademark of GÜLER DİNAMİK.
- If your manager approves your becoming a member, you may become a member of any industrial institution.

Conflicts of interest

GÜLER DİNAMİK expects from its employees to notify it on any actual or potential conflicts of interest at all times. Conflicts of interest occur at times when any employee prefers to use his/her position for his/her personal interests while his/her duties and responsibilities must have been prioritized.

Below basic principles apply to all of our employees:

- If you have a doubt that you may find yourself in a potential conflict of interest, you must consult to your manager.
- You must not abuse your position in GÜLER DİNAMİK or you must not abuse the same for the purpose obtaining any personal interests in the name of GÜLER DİNAMİK.
- You must use all of your sources as determined in your labour contract.
- You must obtain **written approval of your manager** under below circumstances:
- In case you are working for any company that buys products from GÜLER DİNAMİK or that sells products to GÜLER DİNAMİK, in case you have shares in such company or in case you have any financial interests in such company,
- In case you have your own company or in case you make an investment in any company and in case you make an effect on the business related decisions taken by such company,
- In case your first degree relatives are working in any company that competes with GÜLER DİNAMİK, that buys products from GÜLER DİNAMİK and that sells products to GÜLER DİNAMİK, in case your relatives have shares in such company or in case they have a critical amount of financial interest in such company and in case you make an effect on the business related decisions taken by such company.
- You must not encourage any business partners of GÜLER DİNAMİK to be engaged in any business activity with any company, in which you have any financial interest, without notifying our business partner on your financial interests.
- You must not influence your rival in business related decisions.

You must not be engaged in any of the below activities in anyway whatsoever:

- You must not work for any company that is in competition with GÜLER DİNAMİK or that distributes the products of GÜLER DİNAMİK, you must not have any shares or any financial interests in such company.
- You must not provide assistance to your relatives, friends or immediate surroundings in executing supplier or distribution agreements or any other financial contracts that are related with GÜLER DİNAMİK.

If you are in any of the aforementioned situations, please note that you must notify your ethics and adaptation supervisor on such situation and that you must make a "Conflicts of Interest Statement".

Below basic principles apply to managers:

- You must provide a workflow plan, in which a single employee may not perform all of the steps of any financial transaction in the name of GÜLER DİNAMİK without involving any of the other employees (i.e. the steps from initiation of such transaction until approval, payment and reporting).
- You must assess the reports submitted by your employees in relation with conflicts of interest, and you must ensure that relative decisions are documented in written.
- You must ensure that any of the wives/husbands or spouses do not have any superior-subordinate relationship and you must make sure that they are not working in the same department since such situation may cause unnecessary conflicts to occur in the business place. In case you have an affair with any of your employees, you must notify your manager immediately. GÜLER DİNAMİK respects the right to privacy of its employees; however, GÜLER DİNAMİK requests from any of its employees to provide relative information honestly in order to allow GÜLER DİNAMİK to assess accurately any risks that such affair may cause.
- You must not recruit any of your relatives, friends or immediate surroundings in any way whatsoever, if they are unqualified for such position. Recruitment processes of GÜLER DİNAMİK are performed by relative department in accordance with the Recruitment and Unjust Employment Policy of GÜLER DİNAMİK. All of the processes shall be managed under the supervision of such department. None of our employees are allowed to make any effect on any of these processes.

GÜLER DİNAMİK and our Foreign Partners

Misconduct, Corruption and Bribery

Corruption is not tolerated in GÜLER DİNAMİK. Corruption refers to abuse of any position by any employee for his/her personal interests or for the interests of GÜLER DİNAMİK or making any offer that may cause the other party to abuse such interests. Furthermore, bribery, money laundering, seizure, racketeering and nepotism (the practice among those with power or influence of favouring relatives or friends) are included to the scope of misconduct.

A bribery occurs when you receive or give anything of value (offers, promises, donations, gifts/money or loan), i.e. when you obtain or give away any unfair advantage (i.e. any advantage that is not obtained honestly and legally). It shall be deemed that any crime of bribery is committed in case the crime of bribery is offered or implied by any employee of GÜLER DİNAMİK.

Any corruption shall be penalized and may cause critical results to occur both for GÜLER DİNAMİK and relative employees. GÜLER DİNAMİK may face fines with high amounts, penalty to pay indemnity, supervision of relative power exhaustively, prohibition from tenders and risk of losing its reputation. Employees, who are engaged in any corruption, may face the risks of personal fines, personal damage liability, discharge and imprisonment.

Our principles and rules regarding the fight against corruption are explained in detail in the Anti-corruption Policy of GÜLER DİNAMİK, which is directed particularly towards our employees, who are in contact with our business partners and relative authorities.

Principles that are adopted by GÜLER DİNAMİK for fight against corruption shall apply in all of the companies that GÜLER DİNAMİK has a word, including affiliates and joint ventures, in which GÜLER DİNAMİK has majority shares.

We may be held responsible for violation of any legislation and any other unethical activity performed by any of the third parties, who are included to our supply chain. Therefore, third parties must also conform to our principles related with the fight against corruption.

Below basic principles apply to all of our employees:

- You must not be involved in any type of corruption.
- You must provide assistance for ensuring that any of the third parties, who act for GÜLER DİNAMİK, are not involved in any corruption. In case we execute agreements with any foreign partners, including local authorities, you must ensure that anti-corruption policy of GÜLER DİNAMİK is followed.
- You must not make any confidential agreement with any public officers, clients, suppliers or third parties prior to any decision related with any purchase or sale order
- You must refuse to take any remuneration that does not correspond to any service that any business partner is liable to provide.
- You must not be engaged in any commercial transactions that encourage obtaining personal gains or fraud.
- In case you receive any offer from any public or private business partner that implies corruption in anyway, you must notify your manager or Ethics Line on such situation immediately.
- If you have doubts whether you acted accurately, you must discuss such situation with your manager or your must contact **Ethics Committee**.

Below basic principles apply to managers:

- You must ensure that the employees, who are in contact with business partners and local authorities, are aware of the principles and rules available in the Anti-corruption Policy of GÜLER DİNAMİK and that relative employees participate to the Experience-Sharing Program on Anti-Corruption.

Money laundering and tax procedures

Money laundering is not tolerated in GÜLER DİNAMİK. Money laundering occurs when any money that is gained illegally, including terror activities is invested in any legal commercial activities.

Below basic principles apply to all of our employees:

- You must not accept any cash payments or cheques that are provided/issued by any unknown third parties.
- You must abstain from any procedures that disregard the conditions of recording or reporting.
- You must abstain from being involved in any transactions that cover any countries or regions that are known for money laundering activities or that are known as tax haven (in case the main field of activity of relative entity is registered in any such area).
- In case you have no valid reason to make any payment and if we are not open to such issue, you must abstain from making payment to any of the countries, from which GÜLER DİNAMİK does not supply any service.
- You must abstain from any rule variances, such as incomplete, suspicious or inaccurate payment information etc.

Facilitating Payments

Facilitating payments refer to small symbolic amounts that are paid to any lowly enlisted public officers for realization of any routine transaction, which you are entitled to, and that may cause company or company employees to suffer serious delays or other problems in case such amount is not paid.

Below basic principles apply to all of our employees:

- In case you shall not endanger your health or personal security by making such payment or in case you have not run out of options and if it is not a small amount, you must abstain from making any facilitating payments at all times.
- In case you make any facilitating payment exceptionally, you must endeavour to keep the payment amount in minimum and to obtain invoice.
- In case you make any facilitating payment, you must ensure that such amount is recorded as a facilitating payment. The condition to maintain records shall also be apply, in case any business partner makes any facilitating payment for GÜLER DİNAMİK. Reporting and transparency are required legally, and are the main component of the fight against facilitating payments.

Piracy, Seizure and Racketeering

GÜLER DİNAMİK does not make any payment to criminals to ensure that people are protected from violence or for any property to be protected from being destroyed.

Below basic principles apply to all of our employees:

- In case you are asked to make payment of racketeering value, you must notify your manager or Ethics Committee on such situation.

Below basic principles apply to managers:

- You must notify Ethics Committee on any approaches made in relation with racketeering.

Gifts and Hospitality

Exchanging gifts is regarded as a normal business practice and a sign of respect in most countries. Traditions vary from country to country significantly, and there is a fine line between appropriate and inappropriate actions.

Furthermore, it is considered as a risk to exchange gifts in sectors that are engaged in business activities with any public authorities directly, such as customs brokerage, and such issue is being managed sensitively.

It is our basic principle to ensure that not only our company gives any gifts, but also not accepts any gifts offered by any persons, institutions and organizations, with which we have business relations, including our suppliers.

In order to ensure transparency and to protect the employees of GÜLER DİNAMİK from any suspicion of bribery, we do not approve and we prohibit exchanging any gifts.

A message, which explains this policy of our company, shall be sent to all of the relative parties prior to any special days and religious festivals, which may bring up the issue of exchanging gifts, and we shall prevent our employees from being stuck in a difficult situation.

Below basic principles apply to all of our employees:

- You must not accept any gifts offered by any institutions, organizations or persons, with which we have a business relationship or with which we have the potential to establish a business relationship in the future.
- You must notify your ethics and adaptation manager on any gifts that are sent to you without your knowledge. Thus, such gift shall be returned with a letter of thanks signed by company authorities.
- Employees, who are in contact with business partners and local authorities, must conform to any of the principles and rules that are available in the Anti-Corruption Policy of GÜLER DİNAMİK.

Memberships, Donations and Sponsorships

GÜLER DİNAMİK may support local institutions by donations and sponsorships, provided that it is proven that memberships, donations and sponsorships are related with the interests of GÜLER DİNAMİK, that they support our values and that they correspond to the sustainability policy of GÜLER DİNAMİK or to any of the social responsibility projects.

Memberships, donations or sponsorships may never provide any unjust advantage to GÜLER DİNAMİK (i.e. any advantage that is not obtained in a dishonest way and illegally or that may be perceived as a bribe).

Below basic principles apply to all of our employees:

- You must ensure that those, who receive sponsorships and donations, do not experience any conflict of interests in cases where something is expected in return.
- You must assure that the person, who receives any donation or sponsorship, is not a potential business partner.
- You must assure that the person, who receives any donation or sponsorship, does not have any connection with the company or public officer, with whom he/she wishes to establish business relations.
- You must assure that the recipient institution has an objective and reputation that are consistent with the values and interests of GÜLER DİNAMİK.
- You must assure that the recipient actually is in need of such donation or sponsorship and that the recipient made a written application.
- You must notify your manager on the contracts made in relation with donations and sponsorships.

Fair Competition

GÜLER DİNAMİK prohibits exchanging any type of correspondences with rivals or making any oral agreements with rivals or any equivalent action that are in violation of competition laws, that abuse our position in the markets we dominate or that prevent or restrict free competition etc. It is very critical for GÜLER DİNAMİK to not to violate these principles and rules. Violation of rules may result in imposition of fines with high amounts, imprisonment, loss of business and loss of reputation on both our company and violating manager.

Below basic principles apply to all of our employees:

- You must conform to the principles that are available in the Competition Adaptation Program of GÜLER DİNAMİK.
- You must not make any illegal agreement with any of our rivals no matter if it is a written or oral agreement or a tacit agreement.
- You must not abuse the dominant position of GÜLER DİNAMİK in the market.
- You must not exchange any sensitive business information (prices, price development and discounts etc.) with our rivals or their representatives.

Information on Rivals

It is critical for GÜLER DİNAMİK to obtain information on the conditions of our rivals, but such information must always be obtained ethically in accordance with the laws and regulations that protect personal and corporate intellectual rights.

Below basic principles apply to all of our employees:

- You must obtain any information on our rivals not from the rivals themselves, but by using legal resources only.
- You must not obtain, use or transfer any confidential information of others illegally and in any unsuitable way.

Security of Goods and Services

When it comes to building trust for our goods and services, safety and quality are considered as basic components in GÜLER DİNAMİK. Therefore, it is critical for GÜLER DİNAMİK to ensure that our goods and products do not include any specifications that may give damage to human beings, environment or assets.

Below basic principles apply to all of our employees:

If you have just causes in order to suspect of any process defects that may cause the environment or assets to be damaged or that may cause such risk to occur, you must contact your manager immediately.

GÜLER DİNAMİK and Society

Communication and transparency

It is critical for us and our stakeholders, i.e. our employees, business partners, press members and social community, in which we activate. Therefore, we convey financial, social and environmental results accurately and transparently, and we reveal both our achievements and obstacles we came across. Only the managers and departments that are authorized in the Communication Policy of GÜLER DİNAMİK shall be entitled and liable to make statements, make declarations, make interviews, prepare and present reports in the name of GÜLER DİNAMİK.

Below basic principles apply to all of our employees:

- You must conform to the communication policy of GÜLER DİNAMİK at all times.
- You must establish communication with the persons you shall contact/have contacted in an open, honest and respectful way.
- You must assist GÜLER DİNAMİK in its effort to establish good relationships with the local community.
- You may issue press statements on the general strategy and financial status of GÜLER DİNAMİK or you may express the opinions of our company on any religious and political issues only after obtaining approval from your manager or Media Relations Department of GÜLER DİNAMİK.

Below basic principles apply to managers:

- You must ensure that any sectional problems are assessed in collaboration with the employees, and that relative authorities are notified, if necessary.
- You must be in dialogue with relative authorities at all times and you must keep yourself updated in order to ensure that GÜLER DİNAMİK is aware of new laws, regulations and rules, and may make decisions in consideration of any information by being aware of its legal responsibilities and by possessing any information necessary to use any of its legal rights.
- You must ensure that all of the documents that must be maintained according to the laws are maintained, and that GÜLER DİNAMİK and local authorities may access to those documents.

Local Social Loyalty

In most of the countries, GÜLER DİNAMİK is a company that is well-known by the relative country and by the local community in particular, and our reputation is of great importance for the people, who live and work in such countries. Therefore, it is important for us to "keep our home tidy", and to establish good relations with the local community. We respect to the rights and local culture of local communities. We are aware that there may be certain marginalized and sensitive groups in certain local communities.

Below basic principles apply to managers:

- You must ensure that your employees conform to local laws and principles of GÜLER DİNAMİK.
- You must be in dialogue with relative stakeholders continuously in order to ensure that GÜLER DİNAMİK is aware of the requirements and expectations of local stakeholders.

Environmental Issues

GÜLER DİNAMİK works effectively in order to prevent pollution and to produce our services and products by consuming minimum amount of energy and in a way to make minimum amount of negative impact on the environment. We are committed to improve our efforts in relation with the environment continuously, to encourage environmental responsibility and development and distribution of environment friendly technologies.

Below basic principles apply to all of our employees:

- You must consider the environment as you fulfil your daily duties.
- You must follow the environmental instructions that are given to you.
- You must provide assistance to determination of the reasons of any environment incidents, and you must participate to the process of preventing repetition of such incidents.
- You must contribute to the efforts made for saving energy and other resources.

Below basic principles apply to managers:

- You must set an example in reduction of environmental impact, including energy consumption.
- You must ensure that your employees receive training and conform to environmental requirements.
- You must ensure that the activities of GÜLER DİNAMİK do not effect negatively the lives of various plants and animals (biodiversity).

Who should I contact?

Your Department Manager, Ethics and Adaptation Executive and Ethics Committee

E-mail: etik@gulerdinamik.com