

OUR BUSINESS ETHICS POLICY AND RULES

Our company has an enduring reputation for sufficiency, integrity and fairness among our employees, business partners and customers.

OUR ETHICAL CONDUCT RULES

ESTABLISHING AND MAINTAINING FAIR WORK ENVIRONMENT

Establishing and sustaining a fair working environment is among our top priorities. We ensure full compliance with all legislation is introduced in accordance with the United Nations Universal Declaration of Human Rights. We respect human rights, constitutional organization and employee rights. It is our primary duty towards our employees to create a healthy and safe working environment for them. We believe that the peace at work brought about by mutual respect, tolerance and trust in business relations has a significant impact on employee loyalty and performance, and we show maximum effort to this end.

Our principles

We conduct all our business activities in full compliance with all applicable laws and regulations of the countries in which we operate.

We also expect our employees, suppliers and subcontractors that we cooperate to act in accordance with such applicable Laws, and fulfill their responsibilities.

Our Human Resources policy and practices ensure that all practices such as Employment, Career Planning and Employee Development, Salary System, Rewarding, Social Rights are fair.

We never tolerate discrimination among our employees based on language, race, sexual and political orientation, belief, religion, sect, age, physical disability and other reasons whatsoever.

We respect the privacy of our employees' individual life and put maximum emphasis on securing the confidentiality of their personal information.

We pay attention to creating a supportive, positive and harmonic work environment and ensure that the language of verbal and written communication used during business relations includes motivational direction and courtesy.

The violation of the privacy - physical, sexual or spiritual- of our employees in work environment or in other environments, where they are present for business purposes, as well as causing the alienation of the employees from work, harassment and mobbing which may lead their resignation are fully inconsistent with our legal and ethical rules, and such behaviors may never be tolerated.

We adhere to and implement, the Standards of Health and Safety at Work in order to ensure that the work environment and working conditions are healthy and safe for all employees.

The employment of children is strictly prohibited and may not be tolerated.

CONFIDENTIALITY

All information regarding the processes performed or applied by our employees, including financial Information, proprietary and intellectual rights, design and development of Products and Processes, innovation and inventions as well as Business Strategies, the confidentiality agreements we entered into with our Business partners and Customers, Process Performance data and information regarding the protection of our employees' individual life, including those available in Printed and non-printed, audio-visual media are confidential and private.

Our concern about confidentiality also applies to the properties of our customers (information, technology etc.)

Our principles

It is our employees' common responsibility to ensure that knowledge and information is effectively used, correctly shared and handled confidentially, and is integral and accessible.

Knowledge and information are used only in accordance with the scope of duty and responsibility, and may not be modified, copied or disclosed to third parties.

In respect of information which is required to be disclosed to our Suppliers and Business Partners, confidentiality agreements are signed and written promises are obtained prior to the disclosure thereof.

Demands from Government Authorities; confidential information may not be disclosed to third parties unless the disclosure is necessary pursuant to the applicable legislation.

All of the information falling under the above-mentioned scope may not be discussed, nor negotiated at places, the isolation of which are impossible in terms of confidentiality and privacy, such as aisles, dining halls, elevators and shuttles.

All of the personal information of our employees is confidential. Our employees are informed via private personal notification methods. Our employees are not allowed to exert pressure on one another, nor to disclose their personnel information.

We never tolerate any – no matter what it is about - gossip, groundless accusations and statements, which may lead to damage to people and institutions.

GIVING AND ACCEPTING GIFTS

We never tolerate the acceptance of gifts and benefits, which may have an impact on our decisions and behaviors during our business dealings, and damage our objectivity, and our employees are never allowed to give gifts and earn profit for themselves by utilizing company resources and their position in the company.

Our principles

Under the framework of the rules of professionalism and courtesy;

Our employees can give and accept gifts / meals, provided that such gifts and meals are of a standard acceptable in the business world.

Our employees may accept symbolic, non-pecuniary gifts, plates and other similar gifts as a remembrance of the day in Seminars, Symposiums, Congress and other similar organizations organized by Universities and Non-Governmental organizations.

Giving, accepting or offering gifts and benefits, which may create an expectation for bribe and/or commission may not be tolerated under any circumstances.

The gifts and promotion materials which may be given under the framework of business relations shall be subject to the approval of the senior management.

It is necessary that the gifts be in accord with social and cultural sensitivities, not leading damage thereto.

Under the scope of our Social Responsibilities, participation in donations to global organizations, foundations and institutions as well as to campaigns unveiled for such purpose shall always be subject to the approval of the senior management.

CONFLICT OF INTEREST MANAGEMENT

Avoiding acts and behaviors during our all business dealings, which may lead to conflict of interest, is one of our top priority sensitivities.

Conflict of interest refers to any situation, which affect or may affect employees to perform their duties objectively, and to any benefit provided to them, their relatives, associates or the people or establishments they are in relation, and the situation where they obtain pecuniary or any personal gain in relation thereto.

Our principles

Our employees may not use the resources, the name, entitlements and power of the company to gain benefit or interest.

Our employees must avoid using business relations to gain benefit and establishing relationships with suppliers and/or other business relations, which may create pecuniary advantage.

Out of working hours, our employees shall not damage the Company's name and image for the purpose of gaining income and/or benefit, nor shall they act in a way to affect their duty negatively; our employees may be allowed to work at works in accordance with our legal, social and cultural sensitivities within the knowledge and approval of the Management.

Subject to the approval of the management, our employees may work in non-profit organizations, non-governmental organizations, sports organizations and universities, and be engaged in duties for social responsibility and assisting purposes as long as they duly perform their duties in the company.

Our employees may not engage in any political activity in the work environment and any other locations of work during working hours, nor may they waste the time of their colleagues in relation to such activities. Managers may not require the employees to become a member of a Political organization.

The approval for the employees who wish to engage in political activities shall be obtained from the Ethical Committee within the knowledge of the Senior Management.

UTILIZATION OF RESOURCES

It is the primary responsibility of our employees in general to utilize our resources on an economic basis and to avoid waste and losses.

Our principles

Our employees shall manage and preserve all financial, technological and information resources, assets and any natural resources and energy on an economic basis.

Based on the understanding that time is a resource as well, our employees do not allocate time for their private works, nor they accept personal visitors into the work environment during the working hours, except for unavoidable circumstances.

OUR RESPONSIBILITIES

GLOBAL RESPONSIBILITY

In accordance with the United Nations Global Compact, our global responsibility is to act in support of our country and the world, and ensure that our employees and suppliers do also act accordingly.

RESPONSIBILITIES OF OUR EMPLOYEES

It is the primary responsibility of our employees in general to obey the ethical rules.

Within this context, all our employees are responsible for;

acting in accordance with the laws under any circumstances,

being familiar with the business ethics policy and rules, and for reflecting them on their business manner and behaviors by means of internalizing the said policy and rules,

Promptly notifying their Managers and/or Ethical Committee with or without giving his/her identity whenever they become aware of any violations or potential violations,

and providing required assistance to the enquiries of the ethical committee with due diligence to the principle of confidentiality.

RESPONSIBILITIES OF OUR MANAGERS

Our managers are responsible for serving as a model with their behaviors in order to establish and maintain a corporate culture and working environment that supports ethical rules, conducting and supporting training and awareness-raising works to raise the awareness of our employees and encouraging employees to ensure that notices relating to ethical rules are reported to the ethical committee.

IDENTIFICATION OF UNETHICAL CASES AND BEHAVIORS

Please ask yourself the following questions in order to determine whether the situations and behaviors that we face during our working life are ethical or not;

- Can you become aware of any activity, which may be in contradiction with the laws and business ethics, including our company and the business partners, suppliers and the subcontractors we cooperate?
- If the thing required from you or the situation you witnessed or you are in had been known by your family, colleagues and managers, would you have stuck in a difficult situation?
- Can it damage your colleagues, the prestige of our company and our customers?
- How does it reverberate in the media?
- Would you feel uncomfortable if your spouse, brothers/sisters and children had witnessed such a behavior?

- Would you describe it as a violation of privacy (physical, sexual or emotional)?
- You are in a decision making situation, do you have doubts about how you should behave in accordance with the code of business conduct?

ETHICAL COMMITTEE

Ethical committee is responsible for investigating and resolving the complaints and notifications regarding the violation of business ethics rules. The Ethical Committee, which reports to the Chairman of the Board, consists of the persons who serve in the following positions:

For TR operations;

Chair- Martur Fompok TR CEO

Member 1: TR HR Director

Member 2: HR Manager of the respective company

Member 3: Director of the Respective Company/Function

Member 4: Legal Advisor

For operations abroad;

Chair- Martur Fompok International CEO

Member 1: Deputy of MFI CEO

Member 2: Int.HR Director

Member 3: HR Manager of the Respective Company

Member 4: Director of the Respective Company/Function

Member 5: Legal Advisor

The Ethical Committee handles all reports and the investigation with due diligence to the principle of confidentiality. The investigation process is managed and statements are taken with proper written documentation. The reports are handled as fast as possible, and the investigation process is then initiated. Wherever necessary, expert opinions may be received in respect of legal, financial, social and medical subjects.

Once the investigation has been completed, the Ethical Committee takes one or several actions under the legal framework, subject to the approval of the management.

COMMUNICATION

You can contact Ethical Committee members by using the communication channels below.

For TR operations;

E – mail: etik@ustunberkholding.com.tr

“I have a notification” whatsapp account: [0538 575 2510](https://www.whatsapp.com/business/profile/05385752510)

For operations abroad;

E-mail: ethics@marturfompak-int.com