




# Code of Ethics



*We take pride in being a team that brings together different colors in perfect harmony.*



Ethics, Business Ethics and Our Responsibilities

Our «Corporate Values» That Shape Our Code of Ethics

Our Work Environment & Us

Our Company & Us

Our Customers & Us

Our Suppliers & Us

Others & Us

# Ethics, Business Ethics and Our Responsibilities



## What is Ethics?

Acting ethically means choosing to do what is right rather than what is wrong.

Ethics is the set of values that guides us in deciding:

- What is right and wrong,
- What is good for others versus what is only good for ourselves,
- What is beneficial for society versus what benefits only a specific group,
- What is good for the future as opposed to what is only beneficial today.

## What is Business Ethics?

Business ethics is the set of fundamental principles that guide us in making decisions consistent with Bakioğlu Group's corporate culture and values.

It provides a framework that helps us address ethical issues encountered in our daily business activities.



## Our responsibilities

- Learning and understanding the Bakioğlu Group Code of Ethics and related policies and procedures,
- Asking questions and seeking guidance whenever something is unclear,
- Acting in accordance with laws, Bakioğlu Group's Code of Ethics, related policies and procedures,
- Holding our colleagues responsible from acting in accordance with the same sources,
- Taking responsibility for reporting unethical or non-compliant behavior to the appropriate authorities.


## Bakioğlu Group's Responsibilities

- Ensuring that every employee clearly understands the Code of Ethics,
- Promoting the code by trainings and other activities and integrate it to the daily life
- Encouraging compliance with the Code
- Creating an environment where employees feel comfortable asking questions, sharing concerns, and reporting issues.

## Our <Corporate Values> That Shape Our Code of Ethics



- ∞ We care about people.
- ∞ We build trust.
- ∞ Fairness forms the foundation of our actions.

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- ∞ Our actions focus on quality and problem solving.
  - ∞ We continuously improve ourselves and support the development of others.
  - ∞ We are aware of our social responsibilities.

# Our Work Environment & Us

## We care about each other.

- We establish honest and open communication.
- We prevent each others' integrity in any kind of communication even in the form of humors and warnings.
- We value a transparent, fair and efficient working environment based on mutual goodwill.
- We do not tolerate harassment, abuse, verbal, psychological, or physical violence, or any form of aggressive behavior.
- We respect each other's privacy and personal information.
- We do not discriminate based on gender or any other personal differences.
- We avoid discrimination in all our decisions and practices. Differences such as religion, language, race, ethnicity, gender, sexual orientation, marital status, political opinion, or disability are considered valuable aspects of Bakioğlu Group's diversity.
- We do not tolerate behaviors that may cause our colleagues to feel uncomfortable, threatened, excluded, intimidated, or subjected to mobbing.
- We avoid any kind of habits that would restrain us from using our time and consciousness and affect our caution, effectiveness and social relationships negatively.
- We keep our personal political views separate from the workplace and business decisions. During personal political activities, we ensure that we are not perceived as representatives of Bakioğlu Group.

- We report unethical or non-compliant behavior to management.

#### For details

- Personnel Regulations
- Disciplinary Regulations

## We are aware of the importance of health and safety.

- We obey health and safety rules while performing our duties.
- We use the appropriate safety clothes and equipment during our work.
- We inform our management or related department about any in compliance with health and safety rules.

#### For details

- Occupational Health and Safety Manual
- Fire Safety Manual

- We never say, "It's not my job," when health and safety are involved.
- We never lose a second to report or take action.



## Our Company & Us



### **Responsibilities of Our Company**

- Bakioğlu Group establishes the required environment for us to understand and sustain our Code of Ethics and adapt it to our daily life.
- Bakioğlu Group is committed to establish us a healthy, safe, equally treated working environment that provides appropriate options for personal and professional development.
- Bakioğlu Group is also committed to provide us appropriate resources for effectively performing our duties including compatible personal and technical trainings.
- Bakioğlu Group is also responsible from protecting personal information of its employees.



## Our Responsibilities to Our Company

- We embrace behaviors to protect the work environment provided to us and take responsibility on any disrupting situations.
- As a part of Bakioğlu Group, we perform with our best to accomplish our tasks on time with the best and most effective consequences.
- We are aware that we are representing Bakioğlu Group corporate culture with our speech, clothing and actions.



### For details

- Dress Code
- Personnel Regulations
- Disciplinary Regulations

## Our Company & Us

### We protect company assets and property.

- Cash, cheque and other liquid assets,
- Fixed assets, stocks,
- Stationary and consumables,
- Company name and reputation,
- Our products, recipes, customer information and labels,
- Software, phones, internet and email addresses,
- Tools and machinery, vehicles, devices and clothes...

### We protect company assets and property.

- We use our common sense to benefit company assets and property productively and efficiently.
- Although the main purpose of company assets is business oriented, reasonable personal usage is also acceptable. We are committed to produce more than we consume.



We can take company assets home for personal use, time to time.



We are aware that our time is one of the most valuable company assets.

## What are the examples to our confidential information?

Information about;

- Our company's operations, strategic decisions, future plans and wage policies,
- Our production and sales details, our price decisions,
- Financial information and costing,
- Personal information of our co-workers,
- Our R&D projects, designs and patents,

Third parties that we are related to, that are distributed limitedly on a "need to know" basis.

## We ensure confidentiality.

- We protect confidential information belonging to our company, colleagues, customers, and business partners. We share confidential information only on a "need-to-know" basis.
- We avoid discussing confidential matters in public places where conversations may be overheard.
- We are aware that this responsibility will continue even after employment relationship ends.
- We inform our company from important situations including but not limited to; our relatives accepting a job in a Bakioğlu Group's competitor, losing our company computer, or releasing confidential information inappropriately as soon as possible.

### For details

- Information Security Management System Policies and Procedures

# Our Company & Us

## What is conflict of interest?

Any kind of situation that our personal interests would compete with interest of our company or might be considered as a competition.

## We avoid conflict of interest.

- We perform our duties with accountability and transparency.
- We value the interests of our company over our personal interests, performing our duties.
- We do not use our title, name of our company or authorization and resources provided to us by the company for the benefit of ourselves or anyone related to us.
- We do not accept any lending and borrowing relationship with our coworkers, managers, customers, suppliers or any third party we are related on business purposes. We also do not have any guarantor relationship.
- We do not accept cash or other monetary benefits.
- We would not allow any gifts and entertainment affect neither our or our counterpart's business decisions.
- We do not offer or accept gifts exceeding USD 50 in value.

## For details

- Disciplinary Regulations

- We do not accept any discount, promotion or a travel organization provided to us due to our position in Bakioğlu Group unless it is provided to all Bakioğlu Group's employees.



## These might also be considered as conflict of interest!



- My child starting to work for a supplier that I am the one to make the purchasing decisions from,
- Supporting my customer's child's school enrollment and scholarship,
- The travel agency working for Bakioğlu Group offering to compensate my honeymoon,
- Being in the decision mechanism of a tender that my brother in law is also providing a proposal,
- One week family vacation in the summer house of a supplier,
- A raw materials supplier offering me and my wife a trip to the US for visiting his new factory and also a little bit of relieving tiredness of the season.



- We may perform a second job, voluntary activities or paid artistic activities that would not violate the confidentiality of our company or affect our working hours and their effectiveness.

We might consult our manager when we would like to ensure our second job fulfills necessary conditions.

# Our Customers & Us



## Our Commitment to our clients

- We build sustainable, transparent, and trustworthy relationships with our customers.
- We ensure the information we share with our customers is current, complete, comprehensible and accurate.
- We structure our relationship with our customers about our products and services, based on consistency.
- We ensure the products and solutions we provide are the most effective ones for our customers.
- We aim to provide the highest quality products and services with the most reasonable cost.
- We protect the confidential information of our clients as if they are our confidential information.
- We do not personalize our problems with our customers and present constructive behaviors bearing in mind that we are representing Bakioğlu Group.

# Our Suppliers & Us

## Our relationship with our suppliers

- We approach our suppliers respectfully, properly, fair and elaborative based on their commercial features like the quality and price of the products and services they provide.
- All our suppliers would need to pass over similar supplier selection procedures.
- We would not be involved in the selection process of suppliers when some of the bidders are related to us or might cause a conflict of interest.
- We protect the confidential information of our suppliers including their proposals and prices as if they are our confidential information.
- We expect a similar ethic approach from our suppliers.

## We support open and fair competition.

- We avoid restraining open and fair competition.
- We encourage initiatives supporting competition.
- We ensure to provide competitive information only through legal means. We avoid illegal sources of information.
- When we need guidance about competition legislation, we consult with our Legal Department.

- We do not disclose confidential Bakioğlu Group information to our colleagues and friends who are not Bakioğlu Group employees.
- We do not talk about business with our friends working for our competitors.



## Others & Us



### **What is child labor?**

Employment of individuals under the age of 15.

### **What is young personnel?**

Employees between the ages of 15 and 18.

### **We respect human rights.**

- In a group that respects human rights, we work under conditions that are consistent with human dignity.
- We do not employ anyone under conditions other than those they have freely accepted.
- We do not employ child labor.
- We do not employ young workers in hazardous jobs, near dangerous substances, during night hours, or beyond the limits set by law. This rule also applies to our interns



## We respect laws and regulations.

- We present maximum effort to comply with laws and regulations of Turkish Republic and other countries that we are in a business relationship.
- We keep our records and reports based on accuracy, integrity and transparency principles. We ensure all our transactions are reflected with their real states

We never alter, correct or delete our records or reports even it is for the benefit of the company.



## We have zero tolerance policy against bribery and corruption.

- We avoid bribery and any conduct, offer and implication that might be perceived as bribery during our business relationship with public and private sector representatives.
- We preserve our position strictly against bribery offers.
- We would be careful about any kind of corruption, fraud or money laundering incidents that might be executed by people inside or outside of our company and report any suspicion to our manager

Bribery is not limited to cash payments. Gifts, donations, favors, job offers, sponsored travel, or benefits provided to employees or their relatives may also be considered bribery.



## Others & Us



### **We are careful during social media interactions.**

- We avoid comments and posts in our social media accounts that may be perceived as insult, offensive language, spam, verbal interference and violation of personal rights.
- We avoid to damage the reputation and information security of Bakioğlu Group with our social media posts.
- Our confidentiality rules are also applicable in social media.
- We ensure that our ideas and opinions are not perceived as Bakioğlu Group's opinion.
- We ensure the photos we share from company related activities or occupational areas are compliant with information privacy and protection of personal information rules.
- We do not respond to posts and comments about our company or group in social media and inform Corporate Communication Department about any kind of negative information about us as soon as possible.



## **We act with sense of social responsibility.**

- We are aware of the developments in our country and about our environment and we would do our part about these developments.
- We are sensitive to our nation, cultural values, family and environment.
- We take necessary precautions to protect our environment which we consider as an entrust.
- We are committed to decrease the negative impact of our operations to the environment (including plants and animals).
- Using lesser recourses and leaving lesser waste is one of our basic objectives.
- We care about our social impact on the society we operate in. Our actions are based on social benefit.

If it is about environment, we never say "it is only for once" or "meeting client request is more urgent than that".

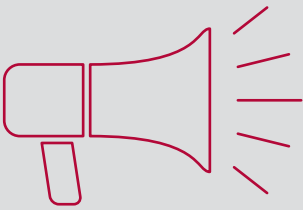


## Others & Us



### **We are careful about our relationship with public institutions.**

- We cooperate with public authorities transparently.
- Our communication with public, independent or company auditors is based on cooperation, transparency limited to their responsibilities, and sharing authentic and complete information.



## To Speak Out Loud

- When we can not be sure of how to apply Bakioğlu Code of Ethics to daily decisions,
- When we witness incidents that might not be compliant with laws, Bakioğlu Code of Ethics or our corporate culture,
  - To seek advice or submit a report anonymously, you can call the KPMG Ethics Line at **+90 (850) 281 55 57** or send an email to **bakiogluetikhat@kpmg.com.tr** When submitting your report, we would like to remind you that it would be helpful to share any information, documents, witnesses, as well as details regarding time and location that may be relevant to the matter.

## We need to be careful when we hear these phrases:

- Everybody does business this way in this market / country.
- Nothing will go wrong. Do not worry.
- Why do not you tell the manager that “this is not ethical”. He is the one who told to do so.
- This will be only for one time.
- I will keep my eyes closed only for this time.
- I know this is not right, but it is approved.
- I have no time to do it right way.
- You should have so much spare time.
- No one will notice. Do not worry.
- So everyone is ethical, but me?