

# Ethics Policy

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Korozo Group is committed to conducting its activities in an ethical and honest way and in compliance with laws and international standards respecting human rights. Korozo Group's Ethics Policy is an extension of our culture of trust and integrity and a reflection of our commitment to ethical business practices.

This policy serves as a guideline summarizing ethical principles and practices expected from all employees, suppliers, and business partners of Korozo Group.

This policy is reviewed annually and revised when necessary. All employees are responsible for the implementation of this policy, and the Human Resources Department, especially senior management, is responsible for its execution and oversight. If any violations of this policy are detected, disciplinary procedure is applied.

## **Respect for Human Rights and Safety**

- Korozo Group adopts an approach that respects human rights for all employees and business partners and aims to ensure the exercise of fundamental human rights across the society.
- The company provides a safe working environment that values human dignity, promotes the performance, development and engagement of employees.

## **Fraud, Anti-bribery and Conflict of Interest**

- Korozo Group will not offer or accept unlawful payments, donations, bribes, gifts or other improper benefits for commercial transactions with employees, suppliers, and all business partners. All suppliers must guarantee that they are not involved in any action contrary to anti-bribery/anti-corruption laws and/or regulations in the regions where they operate and strive to eliminate all forms of corruption, money laundering and bribery.
- Any personal relationships that may lead to conflict of interest between suppliers and business partners must be avoided. Employees must avoid conflict of interest and using the name of the company to gain personal benefit.

## **Ethics of Competition**

- Except for the limits permitted by legislation, Korozo Group does not enter into agreements with competitors or other persons or organizations which directly or indirectly prevent, distort or restrict competition, or that have or may cause such an effect.
- The company only competes in the areas that are legal and ethical and avoids unfair competition.
- We do not share commercially sensitive information including customer and product information with competitors and avoid all kinds of correspondence and communication violating competition ethics.

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## Confidentiality and Protection of Company Information

- Our policy covers confidential and private information belonging to our company, information which may create a competitive disadvantage, trade secrets, financial information, information on employee personal rights, information on our customers and employees. The company shows utmost attention to comply with the Law 6698 on the Protection of Personal Data (“**KVK Kanunu**”) for the protection of this information.

## Honest and Fair Approach

- Integrity, accuracy, fairness and transparency are essential in all business processes and relations, all operations are managed openly and transparently, direct dialogue and information-based communication is established with employees and open communication with all stakeholders is promoted.

## Responsibility to Report Code of Ethics and Violations

Korozo Group does not engage in activities that prevent the discovery of unethical transactions/behaviors of other persons (legal/real).

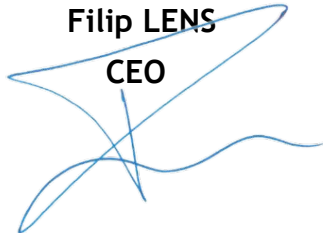
All Korozo Group employees and other related parties can report any ethical violations to **etik@korozo.com.tr**. If a person is thought or suspected to violate this policy, it should be reported to the Ethics Committee. If a violation is found, the Disciplinary Committee should be informed.

During the investigation of a possible violation of the Code of Ethics, no actions will be taken against people reporting an incident, participating or assisting in the investigation of an incident (except in cases where the report itself or the information provided is deliberately misrepresented).

Korozo Group Ethics and Disciplinary Committee ensures the confidentiality of all notifications.

*Effective as of 19.01.2018*

Filip LENS  
CEO



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