



# Code of Ethics

A photograph showing a group of people's hands stacked in a circle, symbolizing unity and teamwork. The hands are of various skin tones and are positioned in a way that suggests a supportive and collaborative environment. The background is slightly blurred, focusing attention on the hands. A red banner is overlaid on the image, containing the text "Code of Ethics".

# Code of Ethics

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## WHAT IS...

### Ethics?

Deciding morally is; choosing to do the right thing, over the wrong.

Moreover, ethics is the sum of values that support us decide;

- Right; between right and wrong,
- Good for others; between good for others and good for us,
- Good for the society; between good for the society and good for a group,
- Good for tomorrow; between good for tomorrow and good for today.

## OUR RESPONSIBILITIES:

- Learning Bakioğlu Code of Ethics and supporting policy and procedures,
- Asking about the unclear parts and asking for advice,
- Acting in accordance with laws, Bakioğlu Code of Ethics, related policies and procedures,
- Holding our coworkers responsible from acting in accordance with the same sources,
- Taking responsibility about nonconformity of our coworkers to these rules or reporting the issue to relevant authorities.

## WHAT IS...

### Work Ethics?

Sum of basic rules that support us making business decisions which are consistent with Bakioğlu corporate culture and principles.

A guiding frame that supports us with ethical problems related to daily business decisions.

## BAKIOĞLU GROUP'S RESPONSIBILITIES:

- Ensuring every employee clearly understands the Code
- Promoting the code by trainings and other activities and integrate it to the daily life
- Promoting compliance to the Code
- Sustaining an environment to share questions, comments and raise concerns



## Our «Corporate Values» that Structure Our Code of Ethics

- We care for people.
- We ensure trust.
- Justice establishes our baseline.
- Our actions are dedicated to quality and problem solving.
- It is our job to improve ourselves and to develop others.
- We are aware of our social responsibilities.



# Our Work Environment & US

## \* WE CARE FOR 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 work environment based on mutual goodwill.
- We avoid unwelcome behaviors including harassment, abuse, verbal, mental or physical violence and aggression.
- We respect each other's privacy and personal information.
- We are not subject to discrimination based on our differences including our gender.
- We also avoid discrimination in our decisions. Our differences including our religion, language, race, ethnic origin, gender, sexual orientation, marital status, political ideas and disability can only be different colors of Bakioğlu Group.
- We would not tolerate any kind of behavior that would cause our coworkers feel uncomfortable, anxious, refrained, rejected, daunted (including mobbing) in our work environment.
- 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 political ideas apart from our work place and our decisions. We ensure that we are not perceived as a Bakioğlu representative during our private political activities.
- We inform the management about any incompliant behaviors.

## \* 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 incompliance with health and safety rules.

FOR DETAILS: Health and Safety Manual  
Fire Training Manual

FOR DETAILS: Personnel Regulations  
Disciplinary Regulations



# Our Company and US

## \* RESPONSIBILITIES of OUR COMPANY \*

- Bakiöğlü Group establishes the required environment for us to understand and sustain our Code of Ethics and adapt it to our daily life.
- Bakiöğlü is committed to establish us a healthy, safe, equally treated work environment that provides appropriate options for personal and professional development.
- Our group is also committed to provide us appropriate resources for effectively performing our duties including compatible personal and technical trainings.
- Bakiöğlü 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 Bakiöğlü team, 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 Bakiöğlü corporate culture with our speech, clothing and actions.

FOR DETAILS: Dress Code  
Personnel Regulations  
Disciplinary Regulations

## WHAT ARE...

### company assets?

- 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.

# Our Company and US

## \* WE ENSURE CONFIDENTIALITY

\*

- We protect confidential information of our company and each other. We share these information on a “need to know” basis.
- We do not talk about these information in public areas where people might eavesdrop our conversation.
- We are aware that this responsibility will continue even after our relationship with Bakioğlu Group ends.
- We inform our company from important situations including but not limited to; our relatives accepting a job in a Bakioğlu competitor, losing our company lap top, or releasing confidential information inappropriately as soon as possible.

## WHAT ARE...

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.

**FOR DETAILS: Information Security Management System Policies and Procedures**





# Our Company and US

## \* WE AVOID CONFLICT OF INTEREST \*

- We perform our duties based on 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 from these people.
- We would not allow any gifts and entertainment affect neither our or our counterpart's business decisions.
- We do not accept or give any gifts exceeding USD 50.

FOR DETAILS: Disciplinary Regulations

### 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.



### 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 Bakioglu 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 and US

## \* OUR COMMITMENT TO OUR CLIENTS \*

- Our relationship with our customers is consistent, elaborative and sustainable.
- 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.

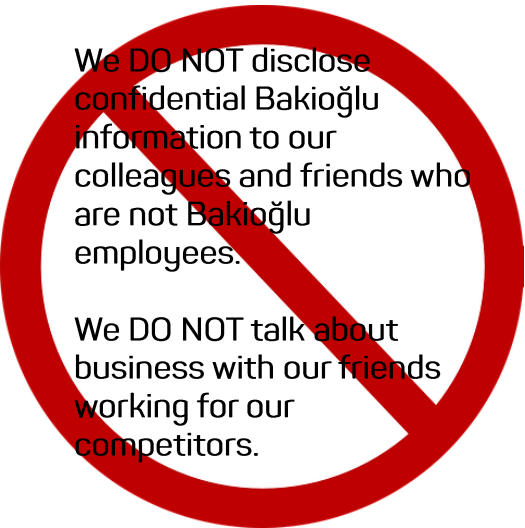
# Our Suppliers and US

## \* 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 information to our colleagues and friends who are not Bakioğlu employees.

We DO NOT talk about business with our friends working for our competitors.

# Others and US

## \* WE RESPECT HUMAN RIGHTS \*

- We are employed in a group respecting human rights and work under proper conditions.
- No form of forced labor is acceptable.
- We do not accept child labor.
- We do not employ young personnel for hazardous jobs, near hazardous materials, at night shifts and outside legal limits. This rule is also applicable to our interns.

## WHAT IS....

child labor?

Employees under the age of 15.

young personnel?

Employees older than the age of 15 and younger than the age of 18.

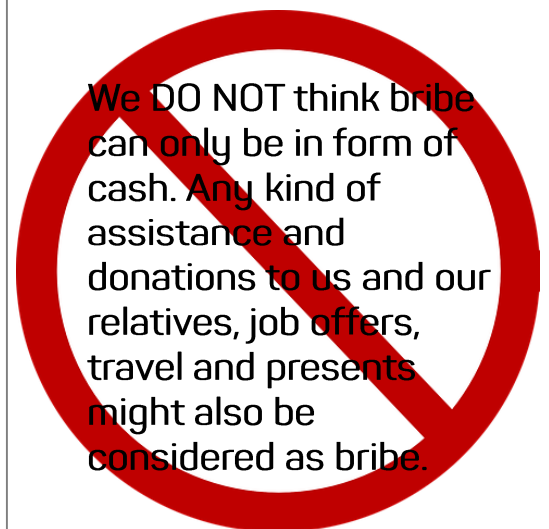


## \* WE RESPECT LAWS AND REGULATIONS \*

- 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 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.



## Other and 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 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.



### \* 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,

we consult with our manager, Human Resources department or upper management if it is needed. During our consultation, we ensure that we share all relevant information, documents, witness name, time and place details.

### 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?