

COMPLIANCE

Regenerated for All

**GLOBAL
CODE OF
CONDUCT**

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“Honesty, integrity, and superior business ethics are the foundations of our business conduct. We conduct our business based on good intentions, mutual benefit, and fair treatment in all our relationships. We are committed to conforming at all times to the highest ethical and legal standards.”

Vehbi Koç

As indicated by our founder Vehbi Koç, we have strong values, clear policies and standards to ensure our employees and stakeholders always act in high ethical standards.

We designed Global Code of Conduct and related Code Policies to implement the high ethical standards into corporate governance framework to ensure that how we do business is aligned with our values and applicable laws and regulations in countries we operate as directed by Vehbi Koç.

Our Global Code of Conduct framework has three operational pillars:

- Prevention – we work to embed a culture of integrity at all levels, in all geographies
- Detection – we encourage employees to speak up and give voice to our values
- Response – We have the tools to investigate and if necessary, sanction confirmed breaches with a standard and uniform approach, and use what we learn to continually improve.

We conduct our operations with honesty and with respect for the human rights and interests of our employees. All our employees and Business Partners are expected to adopt these rules, act in line with them. Our leaders are responsible from setting examples with their attitudes by leading our employees and making business decisions in accordance with the Global Code of Conduct and related Code Policies.

Our Global Code of Conduct and related Code Policies aim to establish our standard of conduct, fight with corruption, ensure our people are respected and information is safeguarded and set the standards for external engagements.

However, Global Code of Conduct and Code Policies cannot cover every eventuality, particularly as laws differ between countries. If specific situations are not expressly covered, the spirit of the Code of Conduct and Code Policies must be upheld by exercising common sense and good judgement in light of the objective criteria.

Our Way of Doing Business



Compliance with the Law

We recognize the compliance with all relevant laws and regulations as the minimum standard globally.

Employees

We are committed to a working environment that promotes diversity and equal opportunity, equal pay for equal work where there is mutual trust, respect for human rights without discrimination. We are committed to safe and healthy working conditions for all employees. We will recruit, employ and promote employees on the sole basis of the qualifications and abilities. We put the necessary effort into our employees' personal developments. We will not use any form of forced, compulsory, trafficked or child labour. We respect our employees' freedom to organize as a union and their right of joining trade unions.

Consumers

We adopt an understanding towards all our consumers that is satisfaction-oriented, addressing their needs and expectations in a correct manner within the shortest time possible. We treat our customers respectfully, equally and in line with the rules of courtesy. We take complaints from our customers seriously and provide solutions thereto.

Our products will be accurately and properly labelled, advertised and communicated in accordance with the relevant regulations. All marketing activities (brand names, consumer planning, market research, trade advertising, sales materials in all forms included) must:

- Describe the performance of our products truthfully, accurately and transparently,
- Ensures there is sufficient information for our consumers, so they fully understand how to use our products and technological implications of the product,
- Guarantee that our advertisement activities are not offensive and do not use religious, ethnic, cultural, sexual orientation, gender, age, disability or minority group discrimination,
- Not advertise in any media known for promoting violence, pornography or insulting behaviour.

Shareholders

We aim to protect the interests of all our shareholders. We are committed to creating business models that will increase our competitive capacity and our growth potential. We will conduct our operations in accordance with internationally accepted principles of good corporate governance.

Business Partners

We are committed to establish mutually beneficial relations with our business partners including suppliers, distributors, dealers, authorized service providers, agents and consultants. In our business dealings, we expect our business partners to act in line with our values.

Society

We work toward “sustainable development” in social and environmental issues. We develop projects in order to improve social standards, contribute to sustainable economic growth and create employment opportunities. Considering the principle that culture, arts and sports are the most important elements in the development of a society, we contribute to the development of society we operate in by supporting various culture and art events.

In our innovations to meet consumer needs we will respect the concerns of our consumers and of society.

(See also [Global Donation Policy](#))

Government and NGOs

We will co-operate with governments and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect legitimate business interests. We neither support political parties nor contribute to the funds of groups whose activities are calculated to promote political party interests.

Arçelik strives to be a trusted corporate citizen and, as an integral part of society, to fulfil our responsibilities to the societies in which we operate. We support our employees to take part in nongovernmental organizations. In situations that require social solidarity, we consider it as a part of social responsibility to organize public aiding activities without concern for commercial purpose.

Environment

As Arçelik, we adopt the “Sustainable Development” and environmentally conscious approach as a requirement for our management philosophy. Pursuant to the principle of “Respecting the World, Respected Worldwide” that we have adopted, we accept the liabilities we have for climate change and conservation of biodiversity.

Competition

We believe in vigorous yet fair competition and supports the development of appropriate competition laws. All companies, business partners and employees will conduct their operations in accordance with the principles of fair competition and all applicable laws and regulations. The violation of competition law may have serious consequences for both companies and employees such as heavy fines and damage claims. In some countries, employees may even be liable for criminal sanctions.

Arçelik co-operates fully with the competition authorities, while consistently and robustly defending its legitimate interests. All contact with competition authorities (including, where relevant, national courts) are co-ordinated by Arçelik Legal and Compliance Department, Competition Manager.

(See also [Global Competition Law Policy](#))

Bribery and Corruption

Arçelik does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

We do not tolerate any kind of corruption, embezzlement, and any kind of facilitation payments or bribery, regardless of the type/manner of performance.

All accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

(See also [Global Anti Bribery And Corruption Policy](#))

Conflict of Interests

We expect all employees and business partners to stay away from actual and potential conflicts of interest and not to engage in any business relationship that or potentially conflicts with the interests of our company, such as personal and financial interests or off-company activities.

(See also [Global Gift And Hospitality Policy](#))

Trade Restrictions

Some of the countries in which we operate impose restrictions on some countries, companies or people and there is the risk of serious sanctions such as monetary fines, cancellation of export licenses and possibility of imprisonment in case of non-compliance with these restrictions. Therefore, we follow trade restrictions, export controls, boycott, embargo, and corruption and customs laws closely and act in compliance with such applicable laws and regulations.

(See also [Global Anti-Money Laundering Policy](#))

Safeguarding Information

Confidential information is protected by our company policies and applicable laws in countries we operate. We strictly adhere to company policies and procedures to protect confidential information and do not share confidential information with third parties.

(See also [Global Protecting And Retaining Information Policy](#))

As Arçelik, we use personal information of our employees and Business Partners and consumers to improve the activities and processes of our company to the extent permitted by statutory regulations. We do not share this information with third parties without the consent of the individuals or in a way that violate local laws.

(See also [Global Data Privacy Policy](#))

Monitoring and Reporting

Compliance with these principles is an essential element in our business success. Day-to-day responsibility is delegated to all senior management of the operating companies. They are responsible for implementing these principles, supported by Ethics Committees. Any breaches of the Global Code of Conduct and/or related Code Policies must be reported. Any violation of this policy will result in disciplinary action, up to and including termination of employment. The Arçelik Board of Directors will not criticise management for any loss of business resulting from adherence to these principles and other mandatory policies.

(See also [Global Code Of Conduct Operations Policy](#))

Provision has been made for employees to be able to report in confidence and no employee will suffer as a consequence of doing so.

(See also [Global Whistleblowing Policy](#))

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