



# GLOBAL CODE OF CONDUCT



### MESSAGE FROM THE CEO

The founding principles of Arçelik, trust, honesty, respect, equality and transparency, continue to guide us in our journey. We continue work within the framework of code of conduct defined in line with our core values as stated by the founder of Koç Group Vehbi Koç: “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.” In this context, we have updated the Global Code of Conduct, which explains how we should behave, what we should pay attention to and what behaviors we should avoid in business, in order to adapt it to our ever-growing and expanding structure. It is of critical importance to adopt these universally valid common principles. In line with our corporate vision of “Respecting the World, Respected Worldwide,” it is our responsibility to strengthen this awareness even further, to make our business even better without compromising the principle of honesty, and to create a reliable value chain. I would like you to kindly consider the Global Code of Conduct and Related Code Policies, revised with the motto of ‘Regenerated for All,’ as a guide and a reliable reference. We will continue to create value and differentiate with leading practices, thanks to your efforts to fully embrace and implement these practices.

Yours sincerely,  
Hakan Bulgurlu

## GLOBAL CODE OF CONDUCT

*“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

We designed Global Code of Conduct and related Code Policies to implement Arçelik’s 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 in accordance with laws and regulations, with honesty and with respect for the human rights. 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.

We comply with the regulations in every country we operate, act according to our Code of Ethics when the regulations are unclear, and contact competent authorities when necessary.

We record all our commercial transactions and keep our records completely and clearly according to the legislation in effect, and make sure that the agreements with third parties are clear, understandable, comply with the regulations and Global Code of Conduct.

We are also aware that we must act according to the local regulations and international arrangements within the scope of the Arçelik's contractual obligations, and that any incompliance can lead to administrative penalties for the company, and that individuals may also be held liable.

### **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 take the Universal Declaration of Human Rights (UDHR) as our guide, and maintain a respectful understanding of Human Rights for its stakeholders in countries where we operate. 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.

Full compliance with Arçelik Global Code of Conduct and related Policies is the responsibility of all employees. It is the primary duty of all our employees to complete all trainings (including general and specially designed trainings for departments according to risk assessment) published within the scope of the compliance program. Employees should cooperate with the Global Compliance department in the studies to be carried out to manage the compliance risk, and in addition, they should immediately notify the Global Compliance department about additional risks they detect in their daily operations.

### **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 rights and interests of all our shareholders as determined by the law. 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.

### Social Responsibility, Donation and Sponsorship

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.

In order to support social development in the countries we operate, we make donations and perform sponsorship activities which conform to our principles. We carry out donation and sponsorship procedures in a transparent manner, and ensure that these activities do not contradict with Arçelik’s values or commercial interests.

We do not donate to organizations that discriminate people based on gender, language, religion, race, color, age, nationality and thought differences, or sponsor such activities.

( See also **Global Donation and Sponsorship Policy** )

### Political Activities and NGO’s

We will co-operate with governments and other organisations, both directly and through bodies, 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. We do not use Arçelik resources (vehicle, computer, e-mail, etc.) for political activities. Political demonstrations, propaganda and similar activities are not permitted in the Arçelik premises. However, we are respectful of our employees’ participation to the legal political activities voluntarily, and do not restrict them.

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 publicaiding activities without concern for commercial purpose.

### **Creating a Healthy and Safe Work Environment**

One of Arçelik's objectives is to create a healthy and safe work environment for our employees, and ensure that our Business Partners such as our business agents and distributors also create such work environments. We take all kinds of measures to this end, and provide trainings about occupational health and safety to increase awareness.

We perform our operations in a healthy and safe manner without risking the lives of our employees, contractors, distributors, and the society. Within this concept, we use safely designed facilities, work with professionals who are experts in their fields, and prioritize safety in our processes.

( See also **Global Occupational Health and Safety Policy** )

### **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.

( See also **Global Environmental Policy** )

### **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 Directorate,.

( See also **Global Competition Law Policy** )

### **Using Social Media Accounts**

We continue to use social media, which has been growing exponentially around the world in recent years, according to our company principles and brand values. We are aware that personal social media accounts are a part of individuals' private lives, and respect their sharing preferences.

We are also aware of the benefit to be gained from the correct usage of social media, and the reputation risks that might be brought on Arçelik. Therefore, we avoid sharing information and images which could lead to disputes and ambiguities regarding company matters, and which could violate the companies' confidentiality rules. We make sure that we act according to the regulations, Global Code of Conduct and relevant policies in our social media posts.

## Bribery and Corruption

In Arçelik, it is strictly forbidden to provide advantages to local or foreign officials and other third parties to obtain illegal benefit, regardless whether they are public servants. All our employees must comply with the local and relevant international regulations and Company policies pertaining to bribery and corruption, and we expect all our Business Partners to act accordingly. 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 AntiBribery 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.

If we find ourselves in a situation that can be considered as a potential conflict of interest, we shall inform our managers and the Global Compliance department to avoid possible damages such situation might cause.

## Gift and Hospitality

Gift and Hospitality implementations must be legal and within the limits and amounts specified in Arçelik's Global Gift and Hospitality Policy, must not be of a nature that would affect any decision-making process in our business relations, must be occasional, and in any condition must not give the impression of any conflict of interest.

(See also **Global Gift and Hospitality Policy**)

## Anti Money Laundering

Integration of income derived from illegal activities into the financial system by creating the impression that it has been gained through legal methods is called money laundering. As Arçelik, in compliance with local and international regulations, we take necessary measures against and avoid all kinds of commercial transactions that can be seen as the laundering of proceeds of crime, and perform third party due diligence activities before entering to a business relationship. As Arçelik, we do not interact with third parties about whom we do not have sufficient information, which have negative intelligence, which pose a risk and raise doubts for these reasons.

(See also **Global Anti Money Laundering Policy**)



## Global Sanctions and Export Controls

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.

In this regard, in the occurrence of direct or indirect commercial relationships with persons in sanctions or embargo lists, unless necessary in which case, we first obtain the approval of the Global Compliance Department to ensure that such relationship does not constitute a violation of applicable laws or our contractual commitments.

(See also **Global Sanctions and Export Controls Policy**)

## Personal Data, Privacy, and Safeguarding of Insider 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. We protect the confidential information that we have even after we leave the company, and do not share them 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** )

We are aware that it is a crime (insider trading) to gain personal interest for oneself or for others by acting or transacting based on information about Arçelik traded publicly, or about the capital market instruments issued by Arçelik which could affect the prices or the values of the relevant capital market instruments or the decisions of the investors, and which have not been made public yet ("internal information"), and we inform our employees against such attempts. We take all necessary precautions to ensure the protection and confidentiality of internal information; and avoid acts and transactions which could lead to predatory practices, market fraud or insider trading in accordance with the capital market regulations.



## Monitoring and Reporting

Arçelik Global Code of Conduct and Related Policies have been approved by the Board of Directors. A member of the Board of Directors has been appointed specifically to monitor the issued Policies and ongoing activities within the scope of the Global Code of Conduct practices and to inform the Board of Directors regularly..

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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