

**TÜRK TELEKOM**  
**BUSINESS ETHICS**  
**CODE**

**TT Group Employees are**

**Moral, Honest, Respectful and Reliable**

**The act in discipline,**

**Bear Responsibility;**

**Comply with laws, Company Regulations and**

**Code of Conduct**

**Do you have a problem or concern which you cannot vocalize? Or are you facing circumstances which do not conform to the Business Ethics Code of the TT Group? If so, make a notification to [etik@turktelekom.com.tr](mailto:etik@turktelekom.com.tr).**

## **INTRODUCTION**

Acting with ethics is to distinguish the wrong from correct, just from unjust, good from bad, fair from unfair, and to do what we think to be correct, fair, good and just.

As the employees, we know that we need to do what is good for us, for our colleagues and for TT group. TT Group Business Ethics Code is the main document which we will take as basis and which will guide us.

This Code has been prepared in order to explain how all employees should act in and outside the working environment in line with the vision, mission and values of TT Group, and what sort of sanctions could be applied on the otherwise.

### ***Who Should Comply With TT Group Business Ethics Code?***

TT Group Business Ethics Code cover all employees working in Turk Telecommunication Inc, Avea Communication Services Inc. and TTNET Inc.

## **BUSINESS ETHICS CODES**

### **A-BEING RESPECTFUL, HONEST AND RELIABLE**

#### ***a)To be Respective, Honest and Reliable in our Relationships;***

As the employees, we should take principle the highest behavioral standards, and should not make concessions from being respectful, honest and reliable in all of our relationships inside and outside the Company in order to take further TT Group, which is a source of proud for our country and for us.

In the name of TT Group, we should comply with laws under which we have responsibilities against our customers, suppliers, business partners and official authorities, act ethically and honestly in every subject, be reliable and take the responsibility in all of our actions.

Our Group Companies should recall the feeling of trust in everyone that we are in relationship with, and we should keep this trust at the highest level.

#### ***b)To be Respective, Honest and Reliable in the Work We do;***

We should demonstrate the kindness and respect which the working environment required at all times and under any condition. We should participate in the works which should be done together, and shall not engage in any behavior which could hinder the works and processes. We should fulfill the works which we are assigned to and are responsible for in a timely and complete manner.

We should not forget that it is highly important from the point of view of reputation and reliability of our Group Companies in the market that the works we do are correct and understandable.

To ensure this;

- Make sure that the information, documents, records and reports you prepare are complete, correct, understandable and prepared in a timely manner;
- Keep a complete and timely record of incomes and expenditures
- Do not serve any untrue notice in order to reach the targets assigned

- Do not make alternation on any original copy of any document
- Do not distort the real characteristics of any process
- In all of your financial processes;
  - Keep the financial records in accordance with the regulations,
  - Make sure that documents pertinent to commercial and financial processes reflect the reality
  - Do not make any payment which could be used for any purpose other than what it is intended for
  - Be transparent, honest and understandable in all records, reports and documents you prepare within the framework of accountability (accounting records, contracts, spending/ quality/ examination reports etc.)

**Example**

***IK Applications***

*Three employees working in unit a have agreed among themselves to give positive scores to the criteria the determined within the scope of competency assessment process. These employees prevented accurate operation of the assessment system which is being implemented, causing HR application to lead to erroneous results.*

***Declaration of Travel Costs***

*One of our employees received an invoice by agreement from a taxi during his travel visit, and reclaimed the fare although he did not use the taxi. He made a false statement with this behavior.*

***Sales Target***

*One of our employees engaged in unreal sales by agreeing with his colleagues or relatives in order to meet monthly sales target. He engaged in false transactions with these false sales.*

***Budget planning***

*Manager of unit A requested for a higher budget than what is required at the beginning of the year in order to keep the saving target assigned, and declared that he completed the year by using a lower budget and thus engaged in a false declaration to reach the target.*

*In the foregoing examples, our employees violated TT Group Business Ethics Code with their behaviors.*

**B- PROTECTING THE ASSETS OF THE COMPANY**

***a)What are our assets?***

- Knowledge and experience which enable us to perform the works accurately and be effective,
- Working hours and our time assigned for doing business,
- Fixtures such as any type of electric, electronic or technical devices, stationary materials, office materials,
- Energy and fuel used for heating up, illumination, switches and systems,
- Water,
- Paper used for correspondence and cleaning purposes,
- Marketing products,
- Confidential information pertinent to our Group Companies,
- Brands pertinent to our Group Companies,
- Fleet vehicles of our Group Companies,
- Social event tickets, invitations etc. under the sponsorship of our Group Companies;

Employees are responsible from using all of these assets in line with their purposes and within the framework of rules determined, as well as protecting these resources. Whereas we will not use our assets for our own private works and interests, other than those which are assigned for personal use, we also may not let them be used for the benefit of third persons.

Taking the physical assets as well as any type of hardware, products and information outside the company without permission is characterized as theft and do not forget that this situation may lead to heavy sanctions which could even lead to the termination of work contract.

In protecting and using the assets;

- Share the knowledge and experience in a timely and accurate manner;
- Adopt the principle of “saving in any subject” and act as model in this issue if you are a manager,
- Approach the assets that you have with common sense, and use them in line with your needs. For example, the fixed line and internet service in your office are among the assets provided to you. However, if you use these for your private works more than what is necessary or for any other purpose, this demonstrates that you do not use company assets correctly.
- Similarly, due to company policies or as part of your side rights, assets such as car, phone, laptop computer, tablet or fixed line could be allocated for your personal use, however, make sure that you use these assets in line with the regulations and general practices.
- Do not use the stationary items, printed documents and any type of fixtures for your private works and do not take them outside the company.
- When your task is over, deliver any type of assets, worthless documents, files, printed information, documents, records and fixtures to relevant units.
- Do not forget that you are responsible from applying all information and safety procedures to protect the computer hardware and electronic devices against theft and use by unauthorized persons.
- Manage your working time conscious of efficiency and saving
  - Make sure that your use your time during working hours in the most efficient manner and that the time allocated for your private works during working hours (other than emergencies) or your private visitors does not prevent you from fulfilling your responsibilities or delay them
  - That you do not live your working place so as to hinder your works and responsibilities or that you do not act in a manner to hinder the works of your colleagues and waste your times
  - When you are assigned outside the company, make sure that you use your time in an efficient way and take your time to deal with works assigned to you.
- Do not forget that you should use catering, transportation service, social and health services in line with relevant regulations and practices.

**Example:**

***Working Hours***

*Private requests of the managers from their employees such as giving the car to car wash, taking the child from kindergarten, bringing a document or belonging forgotten at home, lead the employee to spend working hours for the private works of the manager.*

***Working Hours***

*An employee who is assigned in the field has over-declared the hours of visits paid to clients who left breakdown record and dealt with his private works during the remaining hours.*

***Stationaries***

*One of our employees requested stationary items more than what is needed, and used these for the school needs of his children.*

*Since these behaviors will mean that company assets are used other than for the intended purpose, these constitute a violation of TT Group Business Ethics Code.*

As we do not leave the lights on and leave our houses or leave the water flowing from the tap, or we avoid using excessive towel for drying our hands, we should avoid any waste by using the sources of our Group Companies and also of our country in the most effective manner, and also avoid using anything we do not produce in a careless manner and more than what is necessary. We should demonstrate conscious behaviors on this issue, be a model for others and warn our colleagues who do not demonstrate the same sensitivity.

### ***b) Use of Common Areas***

We should pay due care to demonstrate behaviors accepted by all in protecting and using the common use areas such as sports and social facilities, catering halls, guest houses and lodging as well as transportation services which are allocated by Group Companies to the employees. We should comply with the rules published in relation to their use.

We should not forget that no posters, hand ads or notes other than those permitted by the administration could be posted on common use areas, that no goods and services could be traded in our buildings other than those which are permitted and that no dangerous tools or those for attacking purposes could be kept at the workplaces.

### ***c) Occupational Health and Safety and Protection of Environment***

Our Group Companies has adopted the prior target of creating a healthier and safer working environment for our employees, minimizing the hazardous impacts on the environment with our activities and using environmentally friendly technologies.

In line with this targets, it is expected from our employees that they

- Act in accordance with legal regulations, practices and accepted standards at our workplaces;
- Comply with measures taken as a result of all risk and impact assessments in line with preventive approach;
- Comply with systems to minimize our losses in case of any event, accident or emergency that could arise
- Participate in trainings organized to increase the safety culture, risk perception and environmental consciousness
- Demonstrate objective and transparent attitudes in inspections related to occupational health, safety and environment.
- Report any behavior, situation that could endanger occupational health and safety as well as any accidents that may happen, and act in harmony with the OHS expert in charge.

## **C-INFORMATION SAFETY**

In “Information Safety Policy”, the information is defined as all of the data, text, image, sound and similar contents in physical or digital media which is produced, used, transmitted, archived or legally transmitted to the company during work processes. Strategic information pertinent to our Group Companies, organizational information, commercial/ technical/ financial data, customer/ dealer information, policies/ procedures/ regulations, products, service information, employee personal information and all other information not being limited to these, are considered within this scope.

Related to information security;

- Pay attention to the confidentiality of the information which are confidential and/ or characterized as commercial secret, remain loyal to the principles of loyalty and keeping secrets
- Do not use the private and secret information of the employees, customers, suppliers, business partners and other relevant persons and organizations other than business purposes
- Do not share the information you learn pursuant to business as well as other documents you have with unauthorized persons and authorities and do not use them for your own personal purposes
- Do not use the information and documents which you have against our Group Companies or in favor of the competitors even after you leave our Group Companies
- Pay attention to the protection of intellectual properties such as patents, commercial secrets, names and brands etc.
- Do not forget that it is prohibited to leak any confidential information and / or document under the scope of “Trade of Inside Learners” to gain earning through stock exchange or any other means.
- If it is necessary to share some information with third persons due to business requirements, make sure that information security/ relevant unit is informed and approval is obtained from your senior management and that this information is shared without causing any damage to the company(through confidentiality agreement etc.)
- Do not forget that the e-mail account allocated by the company is allocated for company works and could be inspected.
- Make sure that the sharing of information and documents requested by Regulatory Authorities and Independent Auditors are made in an accurate, understandable and timely manner.
- In case that you access to, are exposed to or share any confidential information by mistake/ outside your authority for any reason whatsoever, apply to the information safety unit and through any of the notification channels included under the title “Notification of Ethic Violations”.

Pay due care and attention in using, sharing, keeping any type of information and documents, and protecting their accuracy and integrity. Act in accordance with the “Information Security Policy” document which is published; since all issues to be complied with are explained in detail in that document, obtain and read that document.

**Example:**

***Product Launching***

*One of our managers shared the information about a new product on which work is ongoing and which will be announced to public soon, with a group of friends he met outside the work. In this case, our employee has violated TT Group Business Ethics Code since he shared this information which is yet prohibited to be disclosed.*

***Use of Social Media***

As employees, we should be aware of the problems that could arise from erroneous use of social media and any type of online platform.

In this scope:

- Avoid any interpretations, criticism and responses that could damage the reputation of our Group Companies in social media and e-mails.
- Avoid any sharing that could constitute an attack to tangible and intangible rights of our employees and/ or third persons in social media and interactive sharing.

Since the issues to be complied with are explained in detail in the Social Media and Internet Use Procedures which is published in this issue, act in accordance with the relevant document. Do not forget to transmit to Group Companies Corporate Communication units any negative interpretations and information you witness about our Group Companies and employees.

## **D-CONFLICT OF INTEREST**

Conflict of Interest is the adverse relation between company interests and personal interests. Any employee obtaining personal interests due to the position he holds or providing interests to those close to him or to third persons, is included within the scope of conflict of interest.

Do not use your position, company goods, and information pertinent to the company for your personal interests during the time you for in Group Companies. Do not keep your personal interests above company interests and pay attention to protect company benefits.

As a customer of our company when you experience a problem related to our products and services, firstly try to find the solution by using TT Group internal reference paths.

### ***a) Supplier Companies and Business Partners***

If you take any duty at the selection of or at any stage of selecting the supplier company/ business partnership due to your position, be careful not to be engaged in any conflict of interest. Obtain “TT Group Procurement Policy” and act in accordance with this policy.

If your spouse, relatives and friends work with supplier companies or our business companies;

- If you have the discretionary authority due to your position in the works engaged with such companies or organizations; or
- If your spouses, relatives or friends have discretionary authority in works carried out with our Group Companies, since it could be possible that you engage in conflict of interest, share this situation with your manager to whom you affiliate, and apply any of the notification channels under the title “Notification of Ethic Violations”.

Besides;

- Do not obey any pressures that could result against our Group Companies, do not obtain any special interest from the customers/ supplier companies/ business partners, and do not transfer any benefit among them by establishing any mediation relationship
- When there occurs any conflict of interest between Customers/ Supplier Companies/ Business Partners, act equally and just against all partners and pay attention to perform your tasks impartially
- Do not engage in debt- claim relationship with the Customers/ Supplier Companies/ Business Partners, do not act as guarantors for them and do not accept their surety
- Do not forget to be served as the supplier of the TT Group for the employees separated from TT Group, the elapse of a period of at least 3 years must since the date employees left from TT Group but to be served as the supplier from their established firms note that it can be taken without regard to time if having technological, economic imperatives or valid reasons that requires them to be particularly preferred with the approval of Procurement Deputy General Manager, relevant Deputy General Manager bought service and TT Group CEO.
- Do not forget that, other than under the conditions which are clearly indicated in the procurement or training contract, no travel could be claimed in such a way that the travel or accommodation costs of the employees or outsourcing staff will be paid by the supplier company, that in case that the budget of participating any such travel or training organized by any supplier company in this manner is approved by TT Group Procurement or Academy units, this could be possible only when all costs are covered by the Company.

### **Example**

#### ***Supplier Selection***

*The brother of one of our employees working in Procurement group works in X company which engages in business with TNet Inc. His manager has assigned this employee with responsibility to follow up works related to X Company. However, our employee did not share the information that his brother works in this company with his manager and thus violated TT Group Business Ethics Code.*

#### ***d) Working Outside our Group Companies***

It is prohibited for us to work in any other works during the period of work in our Group Companies unless otherwise is permitted. This issue is explained in detail under the title “Working Outside Turk Telecom Group Companies” included under “TT Group Companies Human Resources Working Principles”.

Besides, do not forget that you may not obtain interest by providing any service towards works carried out by any customer, supplier, business partner or competitor of our Group Companies for obtaining interest.

In case that you are requested to provide any conference or training against charge by any institution, obtain written approval from Human Resources Common Services Unit.

#### **c) Receiving Gifts, Invitation and Donation In the Name of Group Companies, and Accepting These**

##### ***For accepting gifts, invitations and donations;***

- It is expected that, in accepting any gift, invitation and donation, actions should be careful, a good consideration should be performed and any condition that may lead to conflict of interest should be avoided. Within this frame, do not forget that;
  - Any commission, discount, deduction and facilitating payment, any movable or immovable debentures, share on real estates etc, which effects impartiality and independence, without regard to the tangible value thereof,
  - Which could put the employee who accepts gift or our Group Company under any liability and damage their reputation;
  - Any gift, money, check, property, house, position, free holiday special discount which is given for encouraging act in violation of behavior modals included in TT Group Ethical Code and for obtaining any interest from the accepting employee and affecting the way the employee fulfills his duty; will not be accepted,
- Any gift in the form of money or a value convertible to money shall not be accepted by any means;
- It shall not be accepted to abolish any payment or debt in any manner whatsoever, either fully or partially, or to discharge or abolish any obligation or other responsibility,
- No personal service, interest or benefit, such as avoiding any legal penalty or protecting against incapacity, shall be accepted
- Any gift single value of which does not exceed 50 USD and which you foresee that it will not affect the decisions you take, could be acceptable only after informing your manager, who shall be at least a director, and the total amount of gifts acceptable in a year shall not exceed 600 USD.
- No more than two gifts could be accepted from the same person or institution in a single year.
- Any gift single value of which exceeds 50 USD , or 600 USD in one year, or which is not in accordance with TT Group Business Ethic Code, shall be returned with an annotation “Not Suitable for Gift Giving/ Accepting Principles”, that in cases where the gift is not taken back by the person who gave it or the return of the gift could negatively affect the relationships, these gifts should be delivered to Internal Communication unit to be used for donations and rewarding

- You could receive support from Business Ethics and Industrial Relations Unit on whether the value of a gift exceeds the limit of 50 USD
- No aid or donation could be accepted from the person and organization who has business relationship with our Group Companies, and that the information of donations and aids shall be shared with senior management.

### ***Giving Gift, Invitation and Donation***

Gifts could be given to customer, business partners or supplier representatives in the name of the Company in line with principles determined by TT Group management. Principles applied for accepting gifts, invitations and donations shall also be applicable for giving such.

- Pay attention not to use the gifts for your private relationships with relatives and friends
- Aids or donations to an institution could only be made by General Manager, Deputy General Manager, and Chairman with an upper position Manager approval.
- Those working under the Managers are not authorized to give gifts other than the commercial units
- Gifts exceeding 50 USD could be given upon approval of the affiliated manager, and gifts under 50 USD could be given only after providing relevant information
- On special days, gifts to institutions/ persons with whom the Company has relations could be sent in the name of TT Group Companies by Group Companies Corporate Communication unit.
- It is suitable that the emblem or logo of TT Group Companies should be present on the gifts
- It is necessary to make wholesale procurement depending on the type of gift and timing in line with TT Group Supplier Principles in supplying the gifts in terms of company costs.

### **Example**

#### ***Special Discount***

*One of our employees who coordinate business processes between A travel agency and Turk Telecom Inc. has accepted free air fare for his own personal travel from the agency, which is not granted to other employees. This employee has violated the code by accepting a personal benefit.*

#### ***d) Kinship***

Do not forget that

- Our employees who have kinship relationship up to 3<sup>rd</sup> degree could not be employed as employers/ contractors between themselves, no reporting could be exchanged among themselves, and they may not be effective in each other's HR processes (such as fees, rewarding, career etc.)
- TT Group Business Ethic Committee could decide whether candidates whose relatives up to 2nd degree kinship work in competitive companies can be hired or not in cases where this could cause problem for Company and if this situation occurs after recruitment, this should be notified to the manager to which you report and to the Business Ethic Unit.
- Relatives of sales group employees of 1<sup>st</sup> kinship may not be employed in dealers who do business in the name of our Group Companies.
- No attempt should be made to place relatives to positions in suppliers and business partners.

When you think that you experience a conflict of interest or for any points you have any concerns, please apply any of the notification channels under the title "Notification of Ethic Violations".

## **E-RELATIONSHIPS CARRIED OUT IN THE NAME OF GROUP COMPANIES**

### ***a) Relationships Carried Out For Representing the Company***

- Avoid any behaviors which could damage the reputation and brand of our Group Companies
- Do not give any verbal and written explanation in the name of our Group Companies during the period of your assignment
- Do not make any undertaking before decision processes are completed about works carried out in our Group Companies.
- Do not use any direct or indirect expressions that could be against our Group Companies and services
- Obtain approval from Group Companies Corporate Communication units for any opinion and interview requests from media organizations and share the content of presentation if you are called as presented in trainings and conferences.

### ***b) Relationships With Persons, Institutions and Organizations With Commercial Relationship***

With the companies such as dealers/ contractors/ business partners etc. who has commercial relationship with our Group Companies;

- Our relationships should be correct, consistent and reliable;
- Any works carried out should be in accordance with relevant contracts, laws or regulations.

Product/ service etc. contracts concluded with the companies could be concluded

- in accordance with principles and practices;
- after obtaining the opinion of legal units and unit relevant to the issue;
- taking into account the objective criteria such as cost/ benefit/

### ***c) Relationships with Customers***

The needs, demands and complains of the customers should be responded in the shortest period possible and in the most accurate way;

Relevant measures should be taken to provide the services in an uninterrupted way;

No missing or erroneous information should be given even this could be in favor of our Group Companies.

Honest and fair actions should be demonstrated against customers and the undertakings and promises should be kept in a timely manner.

No discrimination should be applied to the customer, works shall be carried out in a customer-oriented manner and we shall not engage in any behavior which will not be liked by the customer (disrespect, humiliation, mocking, insisting, harassment etc.)

### ***d) Relationships With Political Parties***

In relations with political parties, do not forget that;

- you will not use the name, sources and position of our Group Companies;
- the decision to participate in any political or social event is totally personal,
- this does not have any binding aspect in terms of our Group Companies,
- such activities shall not be conducted during working hours,
- you shall not reflect the opinions and ideas of any political party so as to distort the working order and environment at the workplace.

### **Example:**

#### ***A Political Friend***

*A close friend of an employee who works in Avea Inc. deals with politics and has become a candidate for Mayorship from X party. Our employee prepares a supportive propaganda for the candidacy of his friend towards company employees in order to assist his campaign, thus violating TT Group Business Ethics.*

#### ***e) Relationships With Competitors***

Competition takes place on legal and ethical grounds with other companies in the sector and rules of competitive law are complied with and unjust competition is avoided.

Collecting information about the competitors, sharing and using them should be under legal and ethical rules.

#### ***f) Relationship with our Group Companies***

TT Group is a whole together with its employees, brands and companies. Pursuant to the integration strategy of TT Group companies which increases our operational efficiency and enables us to provide single point service to the customers, as a TT Group Companies employee;

- Use the union of forces at the maximum level in ensuring coordination between companies, procurement and sales of products/ services, and in all works which required collective works such as work processes and work development.
- Do not engage in attitudes and behaviors which could distort labor peace and processing and demonstrate consistent behaviors as part of a whole.
- Act in a transparent and honest manner in works performed collectively.
- Work according to “win-win” principle as a requirement of corporate culture.

## **F-RELATIONSHIPS WITH OUR EMPLOYEES**

#### ***a) Equal Opportunity***

TT Group provides equal opportunities to any of its employees or a candidate who applies for job and acts in honesty and fairness without any discrimination based on title, race, color, religion, gender, political opinion, ethnical origin, civil status, pregnancy concerning such issues as recruitment, promotion, depromotion, fee increase, learning and development, discipline practices, termination of work contract and all other rights.

#### ***b) Discrimination and Harassment***

TT Group pays high importance to creating a working environment devoid of verbal / physical harassment as well as any type of discrimination. Managers and employees never engage in any discrimination, may not act in harassment/ violence against each other and may not permit occurrence of such a working environment. Nobody could be subjected to discrimination based on age, language, race, ethnical origin, nationality, health status, gender, civil status, language and sect, political opinion, philosophical understanding and belief.

### ***c) Mobbing***

These are systematic and planned behaviors aimed at decreasing the performance of the targeted person, leading to his/ her resignation (Example: Criticizing the private life of the employee, continuously interrupting his speech in social environment, continuously rephending the employee before other employees, ignoring his success, not including him into working life, not getting or disvaluing his opinions, reminding his religious and sect status, emphasizing ethnical and regional differences etc.). Employees and managers are not subjected to mobbing in TT Group Companies.

Towards all these;

- Do not forget that it will be a violation of equality of opportunity to communicate your demands concerning transfer, promotion, fee etc. through means inside / outside the company rather than communicating the same to your managers/ HR Units.
- Do not engage in behaviors that could lead to discrimination/ harassment/ violence and mobbing against persons with whom you are in work relationship in work environment.
- Notify the conditions under which you think to be exposed to such behaviors to any of the communication channels under the title of “Notification of Ethical Violations”.
- In case that no measure is taken or initiative is taken when informed about such attitudes or behaviors, it should not be forgotten that the manager of the employee who is exposed to violation is under responsibility.

### ***d) Use of Addictive Substances***

Despite being respectful to personal preferences, use of addictive substances is considered as a significant problem which threatens occupational health and safety and thus high importance is put on creating a working environment cleaned off addictive substances by TT Group.

## **G-OUR RESPONSIBILITIES**

### ***Behaviors We Expect from Our Employees***

Obtain, read and understand well the TT Group Business Ethics Code. In all of our units and organizations, comply with all regulations, principles and practices published by TT Group, as well as TT Group Business Ethics Code. In case that the regulations, principles and practices are in conflict with the laws, do not forget that compliance with laws have priority and that you are responsible from following the changes made in this code as well as complying with the updated code.

Ask the following questions to yourself in conditions which you see as improper and for which you have doubts.

Is the decision you will make or the event;

- Compliant with laws?
- Ethical?
- Compliant with TT Group Business Ethics Code?
- Compliant with TT Group Work Processes and processing?
- Overlaps with TT Group rules and applications?
- Cause positive result for TT Group?

If the response to any of these questions is negative, do not do that work. However, if you still has a doubt, or if your are not sure whether a behavior for which you have information is a violation of code, you can be guided by applying any of the notification channels under the title “Notification of Ethic Violations”

## ***b) Behaviors We Expect from our Managers***

### ***Encouraging the Culture to Act In Compliance With TT Group Business Ethics Code and Rules Determined by TT Group***

We expect from all of our managers, including the Members of Audit Board and Board of Directors, to comply with TT Group Business Ethics Code, and lead other employees to act in accordance with these principles.

As a managers;

- Ensure that all employees under your audit or affiliated to you are informed about TT Group Business Ethics Code and other company practices and that they understand their own responsibilities.
- Engage in mutual exchange of opinions with your employees about TT Group Business Ethics Code and frequently emphasize its importance.
- Create an environment where the employees will not refrain from applying in relation to ethical problems in addition to problems related to the processing of the work performed, where they can engage in open communication and say their opinions in an easy way.
- While making an assessment about your employees, take TT Group Business Ethics Code and TT Group policies into consideration.
- Do not encourage your employees to perform processes in violation of Laws and TT Group Business Ethics Code in order to finalize the work, do not direct them in this direction and permit them to violate these.
- Do not use your manager identity and influence as an element of pressure.
- Do not engage in actions which could prevent revealing your unethical processes and behaviors.
- Do not forget that, as a manager, you are responsible from fixing and developing an ethical culture.

### ***Responding the Questions and Concerns***

When any question or concern is uttered by your Employees in relation to TT Group Business Ethics Code, approach with care and listen the issue carefully. Ensure that all details related to the situation are explained and documents that could constitute evidence are provided, do not feel yourself as being obliged to respond all questions, in cases where you cannot answer, carry the issue under any of the notification channels under the title of “Notification of Ethic Violations”

### ***c) Uttering Code Violations***

All employees are responsible from protecting, fixing and keeping alive the ethical standards.

When you determine that TT Group Business Ethics Code is violated, disclose this issue immediately. When such a method is followed by all of our employees, it will be ensured that the issue will be examined by TT Group Business Ethics Committee and units relevant to the subject and the issue will be resolved in the most appropriate manner without risking health, safety and company reputation and violating TT Group applications, regulations and Laws.

## **II. PRINCIPLES OF APPLICATION**

### ***a) Definitions***

**Employee:** It means Turk Telecommunication Inc, Avea Communication Services Inc. and TTNET Inc., which are affiliated to TT Group, Board of Directors and Audit Board members and all employees working in these companies.

**TT Group Business Ethics Code;** is the whole of basic behaviors and rules which the employees should comply with in line with TT Group mission, vision and values.

**Ethic Notification;** is the reporting of any conditions determined or observed in violation of TT Group Business Ethic Code by TT Group employees in an honest manner.

**Business Ethics Code Notification Form;** is a form in which the employees and those newly recruited to work undertake that they have read TT Group Business Ethics Code, understood policies and rules and that they shall comply with TT Group Business Ethics Code. It is received from all employees and those newly recruited to work in writing or in electronic media.

**TT Group Business Ethics Code Compliance Form;** is a form in which Turk Telecom Group employees undertake that they comply and will comply with TT Group Business Ethics Code. It is received from all employees at the beginning of each year in writing or in electronic media.

**Company;** Turk Telecom Group Companies (Turk Telecommunication Inc, Avea Communication Services Inc and TTNET Inc.)

**Senior Management:** (General Manager/ Deputy General Manager/ Chairman), is the senior level manager who is in charge of operating and administering the company.

**Senior Manager;** is the Director, Deputy Chairman or any manager at that level,

**Manager;** is the Director or Group Director or a manager of the same level.

### ***b) Notification of Ethic Violations***

TT Group employees are voluntary auditors. In case of determination or observation of any situation in violation of TT Group Business Ethics Code, this situation is honestly reported. Assessment of the notification will be facilitated when those who submit notification provide the information and documents in an open and detailed manner, and concertize the violation which is the subject of notification by indicating person, time and place.

It should not be forgotten that notifications related to TT Group Business Ethics Code could never be totally prevented and the employees could serve notification by bypassing their managers.

You can contact with any of the following channels in order to report any violation, behavior or application, opinion or concern which is in violation of TT Group Business Ethics Code

- [etik@turktelekom.com.tr](mailto:etik@turktelekom.com.tr)
- TT Group Business Ethics Unit (Mail Address: TT Genel Müdürlüğü Ankara Kampüsü D Blok 2. Kat 06103 Aydınlıkevler/Ankara )

Feedback is provided to employees who notify ethic violation without violating the legal requirements and conditions which need to be kept secret, in relation to the result of the examination/ research conducted.

- All applications and notifications made to TT Group General Managerate Units and Managers shall be communicated to TT Group Business Ethics Unit.
- Applications and notifications made to Turk Telecom Regional Directorates shall be directed to TT Group Business Ethics Unit without examination if concerned with an issue which causes damage to Company (fraud, debit, theft etc.) and is considered as infamous crime without investigation, and other issues are referred after being examined by Regional Directorate depending on the weight and importance of the issue.

### ***c) Examination, Research***

TT Group takes all Business Ethics Code violations as serious and investigates all complains and notifications. It is ensured that complaints and notifications are investigated in as a matter of emergency in a sensitive way and all claims are handled completely under the principle of privacy, and relevant actions are decisively taken in relation to any violations determined.

If you are included in any investigation research process towards the violation of TT Group Business Ethics Code, collaborate and respond all questions directed to you completely and honestly. Do not forget that a subject of notification which is previously investigated will not be a subject of any further notification.

### ***e) Incurring Any Negative Sanction***

Any notification by an employee for such an issue shall not constitute a basis for formation of a negative opinion about him, otherwise this shall constitute a violation of TT Group Business Ethics Code. Assistance and support of employees who notify possible problems which need investigation and research, are emphasized. Subjecting an employee, who is subjected to any investigation and examination process for notifying a subject to any discrimination, de-promotion, dismissal, loss of right, threat or harassment or any other negative sanction based on such reason shall constitute a violation of TT Group Business Ethics Code.

If you think that you are subjected to any negative sanction for such reason, please notify the subject through any of the notification channels under the title “Notification of Ethic Violations”

### ***f) Intentional Ungrounded Accusation***

TT Group will protect every employee who honestly notifies the issues for which he has a concern. However, do not forget that making an accusation for false reasons, lying to the authorities who investigate the issue and preventing any investigation shall constitute the violation of TT Group Business Ethics Code.

### ***g) Confidentiality***

When you report a notification about TT Group practices or about violation of TT Group Business Ethics Code, any measures will be taken concerning the confidentiality of your identity. Do not forget that you can serve any notification without being in any doubt and that the investigation and inquiry will be held with privacy. Avoid talking to other employees about the event which is the subject of notification in order to assist protecting the privacy.

#### ***h) TT Group Business Ethics Committee***

This is the Committee which investigates the notifications impartially, ensures that relevant research and inquiry are executed and notifications are resolved within the framework of findings obtained, provides consultancy service to the employees about ethical issues and reports the same directly to the General Manager.

#### **TT Group Business Ethics Committee**

**i) For the Manager and employees at this above level:** Human Resources Deputy General Manager, Internal Audit Chairman, Law Deputy General Manager and Business Ethics Committee General Secretary, Human Resources Deputy General Manager shall chair.

**ii) For employees at below Manager Level;** Wage Management and HR Joint Services Director, Legal Affairs Director (HR, Legal Proceedings and Support), Internal Audit Deputy Chairman and Business Ethics Committee General Secretary, Wage Management and HR Joint Services Director shall Chair.

Committee members could demand the participation of relevant Deputy General Manager / Directors to the meeting as required depending on the issues to be handled in the meeting.

Tasks of the Committee:

- The Committee shall meet upon the invitation of the Chairman when required;
- The Committee shall examine the applications and notifications submitted to it, and determined whether TT Group Business Ethics Code is violated
- It has the authority to examine any type of information and document; if necessary, it may ask for the information of employees and request from Internal Audit Units to carry out the examination when required.
- In case that it determines that the TT Group Business Ethics Code is violated and the violation in question also violates the provisions of Group Companies Discipline Principles, it refers the issue to Discipline Committee in order to resolve for the sanctions.
- In case of determination of the facts that our Group Companies incurred material/ immaterial loss or the employees are subjected to discrimination, harassment, mobbing etc. decisions are taken for compensating the damage and providing the motivation of the unjustly treated employee.
- In case that TT Group practices are not in compliance with TT Group Business Ethics Code or create any non-satisfaction among the employees, recommendations are issued for correcting the same.
- Performs actions for establishing ethical culture in our Group Companies and supports actions towards this direction.

Members of Business Ethics Committee act independent of the hierarchy of their organization and managers to which they are affiliated while fulfilling their tasks. No pressure and suggestion shall be implied on them about the issue. They shall act fairly in their assessments, complying with legal requirements and the presumption of innocence.

#### ***1) TT Group Business Ethics Unit (Business Ethics Committee General Secretariat)***

TT Group Business Ethics Unit within the body of Human Resources Deputy General Managerate (Business Ethics and Industrial Relations Group Directorate) is responsible from all works and processes towards the implementation of TT Group Business Ethics Code. Business Ethics Committee General Secretary is the manager of this unit.

This unit

- Records all notifications and creates the meeting agenda of the Business Ethics Committee. Makes preliminary preparations in relation to issues in the agenda.
- Prepares draft text in relation to all complains, notifications and recommendations examined and presents the same for signature by Committee members. The relevant unit/ employees are notified about the result.
- Relevant investigation and examination are conducted in relation to issues which are requested to be investigated by Business Ethics Code.
- Principle of confidentiality is complied with for any type of information and Committee decision concerning notifications made, events and persons.
- TT Group Business Ethics Code and all relevant policies shall be reviewed taking into account the recommendations of Business Ethics Committee, revised and documented and then announced to employees.
- “TT Group Business Ethics Code Notification Form” is taken from employees and new beginners. (Annex: 1 Business Ethics Code Notification Form)
- Training document is prepared in relation to the application of TT Group Business Ethics Code.
- E-trainings are prepared for informing the workers and new beginners about TT Group Business Ethics Code as well as increasing understandability of policies and rules, and actions are taken in coordination with the Academy unit for assigning e-trainings to all employees in certain periods.
- It is ensured that all employees sign “TT Group Business Ethics Code Compliance Form” at the beginning of each year and notifications are thus renewed. (Annex: 2 TT Group Ethics Code Ethic Compliance Form)

*“TT Group Business Ethics Code”, “TT Group Business Ethics Code Notification Form” and “TT Group Business Ethics Code Compliance Form” could be reached at TT Group Portal.*

#### ***i) Sanctions to be Applied for Violation of TT Group Business Ethics Code***

In case of a violation of TT Group Business Ethics Code and referring the subject to Disciplinary Committee by TT Group Business Ethics Committee, shall be imposed punishments indicated at Collective Bargaining Agreement Disciplinary Principles or TT Group Disciplinary Principles depending on the employee’s status (unionized or not). Our employees could be warned in writing in case of violations which do not require discipline penalty in terms of results and nature.

Besides, violations of employees are taken into consideration in HR Practices (Career, Salary etc.),

Documents related to processes applied for those who violate TT Group Business Ethics Code shall be kept in personal life.

#### ***k) Enforcement and Applicability***

TT Group Business Ethics Code shall come into force on the date of adoption by the Board of Directors and as of the date of entry into force hereof, the Principles of Evaluation of Claims on Negative Attitudes and Behaviors of Employees and Ethical Principles of TT Group Companies shall be abolished.

As long as not being contrary to the Ethic Code; context specific ethic rules published by each units of Group Companies are regarded and recognized as an annex of TT Group Business Ethic Code.

## **ANNEXES**

**Attachment:** 1) TT Group Business Ethics Code Notification Form

**Attachment:** 2) TT Group Ethics Code Ethic Compliance Form

**Attachment:** 3) TT Group Ethical Notification Decision Form

## **DOCUMENTS**

- 1) TT Group Human Resources Working Principles
- 2) TT Group Procurement Policy
- 3) Information Safety Policy Documents
- 4) Social Media and Internet Use Procedures
- 5) TT Group Discipline Principles
- 6) Collective Labour Agreement Discipline Provisions