

Code of Ethics and Business Code of Conduct

To ensure that our daily work is in the best interest of our partners and the community, we follow the UPCOM Turkey Code of Ethics.

Our employees adhere to these codes because the way we conduct business, how we approach innovation and research & development, and how we produce and commercialize our products is just as important as the products and services themselves.

UPCOM Turkey strives to continuously improve our ethical standing and to incorporate good ethical practices into our day-to-day work. The Global Code of Ethics and the US Supplement are designed for use by our employees (full-time and part-time) and contractors to help them understand the ethical and business expectations to which they must adhere while conducting business on behalf of our company. Training and educational sessions are held on a regular basis. On a yearly basis, employees acknowledge their responsibility and commitment to carry out our business practices consistent with these standards. Any employee who violates these standards is subject to appropriate disciplinary action.

Employees and contractors are required to report potential violation(s) of the Code of Ethics and the US Supplement immediately. The Code prohibits retaliation against anyone who reports a suspected violation.

Policy brief & purpose

Our Corporate Social Responsibility (CSR) company policy refers to our responsibility toward our environment. Our company's existence is not lonely. It's part of a bigger system of people, values, other organizations and nature. The social responsibility of a business is to give back to the world just as it gives to us.

What is corporate social responsibility?

Our Corporate Social Responsibility (CSR) company policy outlines our efforts to give back to the world as it gives to us.

Scope

This policy applies to our company and its subsidiaries. It may also refer to suppliers and partners.

Policy elements

We want to be a responsible business that meets the highest standards of ethics and professionalism. Our company's social responsibility falls under two categories: compliance and pro-activeness. Compliance refers to our company's commitment to legality and willingness to observe community values. Pro-activeness is every initiative to promote human rights, help communities and protect our natural environment.

Compliance

Legality

Our company will:

Respect the law Honor its internal policies Ensure that all its business operations are legitimate Keep every partnership and collaboration open and transparent.

Business ethics

We'll always conduct business with integrity and respect to human rights. We'll promote: Safety and fair dealing Respect toward the consumer Anti-bribery and anti-corruption practices.

Examples of Corporate Social Responsibility

Protecting the environment

Our company recognizes the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. We'll always follow best practices when disposing garbage and using chemical substances. Stewardship will also play an important role.

Protecting people

We'll ensure that we:

Don't risk the health and safety of our employees and community. Avoid harming the lives of local and indigenous people. Support diversity and inclusion.

Human rights

Our company is dedicated to protecting human rights. We are a committed equal opportunity employer and will abide by all fair labor practices. We'll ensure that our activities do not directly or indirectly violate human rights in any country (e.g. forced labor).

Proactiveness

Donations and aid

Our company may preserve a budget to make monetary donations. These donations will aim to:

- Advance the arts, education and community events.
- Alleviate those in need.

Volunteering

Our company will encourage its employees to volunteer. They can volunteer through programs organized internally or externally. Our company may sponsor volunteering events from other organizations.

Preserving the environment

Apart from legal obligations, our company will proactively protect the environment. Examples of relevant activities include:

- Recycling
- Conserving energy
- Organizing reforestation excursions
- Using environmentally friendly technologies

Supporting the community

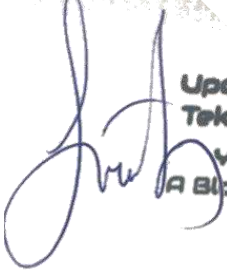
Our company may initiate and support community investment and educational programs. For example, it may begin partnerships with vendors for constructing public buildings. It can provide support to nonprofit organizations or movements to promote cultural and economic development of global and local communities.

Learning

We will actively invest in R&D. We will be open to suggestions and listen carefully to ideas. Our company will try to continuously improve the way it operates. Our company is committed to the United Nations Global Compact. We'll readily act to promote our identity as a socially aware and responsible business. Management must communicate this policy on all levels. Managers are also responsible for resolving any CSR issues.

General Manager

Fatih Batal


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