



# **İŞIKLAR HOLDİNG A.Ş.**

## **Rules Of Business Ethics**



## Group Companies





# 1 | Dear Işık Holding Group Employees

We have adopted “*We neither take an unearned cent from anyone nor let others to have an unearned cent from us*” principle of our Founder Chairman Mr.Turgut Işık.

Employees and shareholders of Işık Holding Group acts with the awareness of their responsibilities against the society, environment, customers and business partners and these responsibilities constitute the basic principles of business ethics of Işık Holding.

In this context, we have written the “Ethics Rules” which are important both for our group and the individual success of our employees, and our Board of Directors has approved it. Işık Holding Group Rules of Business Ethics contains the all the rules which must be obeyed by our employees and primarily by our Board of Directors’ members and managers.

Işık Holding Group Rules of Business Ethics include all employees. Therefore, it is necessary for Işık Holding Group employees of all levels to understand, accept and comply with the Ethics Rules.

Success and reputation of Işık Holding Group are in the hands of our valued employees as they were in the past and we all have to work in order to protect this. We are all responsible for the protection of “Işık Holding” brand.

Do not forget that we can apply and maintain the “IŞIKLAR HOLDİNG RULES OF BUSINESS ETHICS” which is given in this booklet, with the support and attitude of our valued employees. It is in our hands to enrich and sustain our corporate culture for long years.

We thank you all for your support.

Best regards,

**Rıza Kutlu IŞIK**  
Board of Directors Chairman

**Uğur IŞIK**  
Board of Directors Deputy Chairman



## Founder Chairman



**"We neither take an unearned cent from anyone nor let others to have an unearned cent from us"**

**TURGUT IŞIK  
FOUNDER CHAIRMAN**



## 2 | Principles Of Our Founder Chairman

Do your work fondly, even if you return a big profit to us we do not want you to work reluctantly, our first preference is that you work with good will and fondly even if it causes loss, which is impossible. If it is performed fondly, all business earns.

Those who perform sales services must be clear, no one fools anyone. This is an indispensable principle for attitude towards our personnel, group and companies and individuals who work with our group.

Paying of our debts can never be delayed. On the other hand, our receivables shall be collected with the same sensitivity. In every company, top management bears the responsibility of these issues as well. Our companies shall not leave one cent to other parties, and we do not need the one cent of the companies we work with. We will not abandon the justice principles.

No one gives misleading and false information about the business to their superiors, no one can hide information or allow misguiding.

All works should be performed with the principle of quickest, healthiest and most economical solution. Unnecessary expense will be avoided in the performance of our work.

Goal of all our employees is the profitability of the company. Customers are our benefactors. It is mandatory to always provide the best service and to behave in a friendly manner.

No one (from inside and outside) can make a promise for the works which are out of his subject and authority, unauthorized employees especially cannot interfere with the subjects about payments. General Manager assigns the authorities. In the light of this information, given promises are always kept.

Business and politics are different subjects. Politics are not allowed in our companies.

Our activity to search for new customers as a company can never be stopped.

Our companies have to help each other in all subjects. Let's help each other in unity and let's love each other.

**TURGUT IŞIK**  
**FOUNDER CHAIRMAN**



### 3 | Işık Holding Group Rules Of Business Ethics

#### What is the context of this study?

IŞIKLAR HOLDİNG GROUP is committed to the highest moral standards in all relationships both between our employees, customers and the society we live in and the companies that we buy products and services and with our shareholders. We are proud of our commitment to the truth, equality and social responsibility. Moral principles and values guide us in all the works we perform:

**Honesty:** Abiding by the truth with all our employees, acting honestly and downrightly to each other, to our customers, societies, our supply resources and shareholders.

**Truth:** Saying what we want to express, delivering the products we promised and defending what we believe is true.

**Respect:** Behave each other in a respectful and equal manner, being conscious of the fact that the labor force of our company consists of different individuals and that each individual is unique and distinctive.

**Trust:** To give confidence by establishing a clear and intimate communication through team work.

**Responsibility:** In case of acts against our regulation and company principles, to notify these to the authorities clearly and without hesitation; trying to obtain explanatory and directive information in case of doubt.

**Citizenship Consciousness:** To comply with the laws of Republic of Turkey and all foreign countries we work with and to carry out our role in order to improve the society we live in.

This study aims to explicitly introduce the business management principles which includes the responsibilities of our employees towards the company.

“Rules of Business Ethics” includes all the managers and employees of the company and subsidiary companies, all these people shall be referred to as “employees” in the text.

As employees, responsibility of each one of us is to protect the honesty and ethical business principles. We are obligated to be honest, reliable, and trustworthy in our relationships and to comply with ethical business rules at every stage our work.

Objective of the business ethics; is to give us a mutual understanding about what issues are expected from us in our field of work besides the existing regulations and rules of our company. These studies stipulate the principles of business ethics which defines us as a company and helps us understand these principles and sets forth some practical and directive rules which will help you follow these principles. However, it is not possible to include each subject and detail in this study. These rules are designed to cover the most encountered subjects, and it is not a comprehensive rule book.

Please read these ethic rules of our company, make time to think about them and make an effort to work within these rules. We recommend you to apply to your manager or Human Resources Directorate for your questions about these rules and possible ethics violations in your company.

Main principle of this study can be summarized as follows;

**“As a representative of the company, we need to behave honestly, fair and respectfully all the time and in every aspect.”**



## 4 | Our Rules Of Business Ethics

### Conflict of Interest

It is essential that Işık Holding Group employees stay away from conditions which may cause conflict of interest. It is one of the most important responsibilities of all employees to avoid using company resources, name, identity and power for individual gains and from conditions that may affect the corporate name and reputation in a negative way. Your skill of deciding is one of your most important assets. Conflict of interest, on the other hand, restrains your deciding capability. As an employee of Işık Holding, you are expected to act towards the interests of the company.

In order to prevent conflict of interest, our employees are expected to behave in accordance with the following examples.

They avoid causing conditions that may leave an impression of conflict of interest on their behalf or on behalf of their relatives, they avoid taking part in subjects that are related with their or their relatives' interests.

They do not enter into any kind of financial relationship with the customers and suppliers, they do not gain individual advantage by using their business relationship.

They do not hold out on pressures which may result against the company, they do not provide special gain from customers/suppliers, they do not transfer interest between customers/suppliers by establishing an intermediary relationship.

They use their time and effort for the company. They do not undertake any other responsibility that may arise conflict of interest and they do not work within the body of another legal or real entity other than Işık Holding Group.

They do not use the information they obtained through their work in a way that it will cause unearned gain.

They do not have influence on the decisions of promotion or awarding of their spouses or close relatives in the company or subsidiary companies.

If there is a line of descent between the employees, there should not be a vertical or horizontal organizational connection in cases of employment, rotation, promotion and assignment.



## 5 | Our Rules Of Business Ethics

### Accuracy of the Records

Accurate and well protected business records are important for us to perform our work. In this context, employees are responsible to provide the accuracy and compliance with law of all records, files and documents they use all operations on behalf of Işıklar Holding Group. In the performance of company activities and in the prosecution of the responsibilities towards company employees, suppliers, customers and official authorities, these records constitute a basis.

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### Usage of Company Assets and Resources

Assets of the company are for company use and they cannot be used for personal purposes. All kind of goods, assets, equipment, vehicles, computers, computer programs and similar products owned by the company and provided to the employee in order to perform daily works, are given with inventory delivery forms and recorded, and they cannot be used by employees for personal interest or for personal interest of others.

The principle of “savings in all areas” are applied by all employees. Employees need to know that using company assets deliberately for personal gains is against “Rules of Business Ethics”.

Getting into personal finance relationship with customers, people or institutions that perform business on behalf of the company, trying to gain advantage and looking after personal benefit in concluded agreements shall mean indirect use of material and moral assets of the company and creation and/or encountering of such environment should certainly be avoided.

Employees of Işıklar Holding Group cannot work as board member or auditor in companies other than Group companies without the approval of Board of Directors; they cannot work in competitors or the companies Holding has business relationship with. They can work in nonprofit organizations and universities without disrupting their work in the company and with the written approval of the management.



## 6 | Our Rules Of Business Ethics

### Relationship between Customers and Suppliers

One of the goals of Işıklar Holding Group is “To provide the best quality products and services to our customers quickly and economically”. All our employees watch out for being correct, consistent, reliable and helpful in their relationship between companies who are in a business relation with our Company, and with customers. They take great care for a healthy information flow with our customers and suppliers. Every one of our employees, are representatives of Işıklar Holding. We believe that our success depends upon our relationship with our customers which is based on honesty, moral and mutual trust.

### Gift Accepting and Giving Policy

It is essential that Işıklar Holding Group employees do not accept gifts or interest that may affect their objectivity, decisions and attitude, and not to make directly or indirectly an attempt on giving those kind of gifts or interests to 3rd parties and companies. Employees do not request gifts from other people and/or institutions in which the company has a business relationship and they do not imply on that subject.

They cannot accept and gift, money, check, property, free holiday, special discounts etc. which may put the company under obligation.

Gifts and promotion materials to be given to customers, dealer and 3rd parties who have a business relationship with the company, are confirmed by Top Management of the Company.

### Protection of Information

Maximum importance is attached to the confidentiality of the confidential and/or trade secret information of the company and the information and documents belonging to employees and customers. Those information cannot be used by our employees for personal purposes, they cannot be disclosed to the public.

Employees are responsible for the protection of the information of the Company which are not open to public. It is strictly forbidden to use internal information of our publicly held companies for personal purposes.



## 7 | Our Rules Of Business Ethics

### Electronic Mail

Electronic mail has to be used for business purposes. It should not be used for illegal and nonethical etc. messages which may leave you and/or company in a difficult situation.

### Relations with Government Agencies, Private Institutions/Companies, Non-Governmental Organizations and Media

It is essential that the relations of the company with government agencies, private institutions/companies, non-governmental organizations and media are correct and consistent.

Relations of the company with public administration, political organizations, unions and other organizations have to be based on the principles of truth, honesty, equality and independency. It is strictly forbidden to personally make a donation/give a gift to a government agency, nongovernmental organization on behalf of Işıklar Holding Group.

Employees need to avoid conditions which may cause a speculation about the relation of Işıklar Holding Group with the media, conditions which may cause negative evaluation and implementations and attitudes which may damage the reliability, reputation and consistency of the company or sector, or which may generate unfair competition. Such requests and cases need to be notified to Human Resources Directorate or Public Relations Department.



## 8 | Our Rules Of Business Ethics

### Respect in the Workplace and Business Life

Employees of Işıklar Holding Group act each other in a respectful manner. Employees of Işıklar Holding Group cannot act in a way that may unsettle, disturb the other employees, customers or suppliers or in a way that damages the goods of others.

In Işıklar Holding Group, private and family lives of the employees are respected.

Company is obligated to provide a secure, healthy and efficient working environment. Company pays strict attention to protect the personal information of the employees. Due to constant improvement, trainings are provided to the employees in order to allow them reach the required performance level.

Every one working in the company are considered as equal without discriminating between race, language, belief, age, gender, nationality, disability and other categories which are legally protected.

Unwanted, unwelcome acts and all kind of acts which are not welcomed by the respondent are included in the scope of harassment. All kind of acts which are not taken kindly by another employee and acts which contain sexual messages or threats are included in the scope of harassment. All kind of offensive and mocking attitude towards the disability of a physically handicapped employee are included in the scope of harassment. Within this context, all employees pay attention to their attitude towards each other.

### Prevention of Unwanted Acts in the Workplace

### Use of Status Power in the Workplace

Abuse of status power may originate from misuse of personal power (title, physical, personal, age) of the employee or the misuse of collective power (power originating from majority). Responding in an appropriate and constructive attitude towards the errors made by employees in a reasonable and logical level, evaluations performed for the improvement of employees in the performance system etc., are examples of normal use of status power.



## 9 | Our Rules Of Business Ethics

### Harassment, Targeting, Sacrificing

We all have right to be respected and human dignity. It is not possible to accept an action which may violate this or especially sexual harassment.

We should avoid acting or speaking in a way that it would isolate the employee, targeting someone and wearing actions which may create psychological pressure. Systematic and planned actions directed at alienating the targeted employee from work, reducing his performance and causing him to resign may be given as example. (for example: criticizing the personal life of the employee, interrupting him in crowded environments, insulting him in front of other employees, ignoring his success etc.)

Işıklar Holding Group takes all measurements to prevent such actions and it expects from all employees to pay strict attention to this.

### Our Relation with the Environment

As Işıklar Holding, we know the importance and value of a healthy and clean environment. Our employees have to apply the principles of health, security and environment correctly in all areas where our company operates.

Protecting the world we live in is of utmost importance.

We pay attention to plan, construct and operate working places which protects our employees and existing resources. This attention also includes the use of necessary protective equipment, taking measurements and performing the works securely.



## 10 | Implementation Of The Rules Of Business Ethics

### Compliance with Rules of Business Ethics

Employees need to take all precautions in order to prevent possible violation of the rules.

Employees, when they are doubtful about rule violation, has to inform it to their managers or Human Resources Directorate.

Being available for the employees, answering their questions, providing training and consulting is among the assignments of Işıklar Holding Top Management.

Rules of business ethics are reviewed every year in accordance with the technological developments, world and environment conditions, and dynamics of the company and the recommendations of our valued employees.

It is impossible to explain how to implement the above mentioned working principles in every situation we face. Therefore, we may ask ourselves these questions;

Am I doing the best thing?

Is what I have done is appropriate for environment and society?

Will what I have done protect the reputation of my company?

Do not forget that we are a big family. We are an extended family which believes in the love and respect principles between the elders and the minors and whose name is remembered with the moral values it created and shared in line with the principles of our founding chairman. Our name is one of the most important assets of this family. The responsibility to protect and improve this asset belongs to all of us.

Best regards,

**IŞIKLAR HOLDİNG A.Ş.**



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