

CODE OF ETHICS

Making the right decisions while doing our jobs...
Honest approach, transparent business relationships...



OUR VISION

To provide innovative service beyond expectations.

OUR MISSION

In the automotive industry, Doğuř Otomotiv is a company that:

- Operates on the principle of customer focus,
- Knows its industry well,
- Is aware of the expectations of its stakeholders, defines new expectations and aims to satisfy them at the highest level,
- Maintains a creative workforce that makes good use of technology,
- Is trustworthy,
- Strives to deliver productive and profitable service in every stage of the automotive value chain.

OUR STRATEGY

Doğuř Otomotiv's corporate strategy is built on three main axes:

“Be sizable, be close, be creative.”

“Be sizable” Doğuř Otomotiv pursues growth through systematic, efficient and profitable activities in the Turkish and international markets in all business lines to which it provides service, and aims to build up its own human resources in keeping with such growth.

“Be close” Doğuř Otomotiv strives to understand the expectations of its stakeholders, particularly its customers, and to exceed those expectations efficiently and quickly.

“Be creative” Being aware of the fact that differentiation can only occur through creativity, Doğuř Otomotiv creates a competitive advantage in the market with continuous innovation as well as an inclusive approach in product development, customer service and business concepts, and it takes measures to conduct its activities leaner, faster and more economical through process improvement teamwork.

OUR COMMITMENT

As Doğuř Otomotiv, we consider the customers as our key stakeholders and operate on the principle of providing them excellent service at every stage of the automotive value chain. This principle is the fundamental reason for the existence of Doğuř Otomotiv.

Only when we focus on the satisfaction of our customers and act as a responsible member of the society we live in;

WE CAN BE SUCCESSFUL AT

- Being a part of a valuable brand for our shareholders,
 - Providing the best working environment for ourselves,
 - Representing a meaningful value for the society.
- Doğuř Otomotiv's magnitude is sustained in this way.

Business Ethics Understanding of Doğuř Otomotiv

Doğuř Otomotiv's business ethics understanding is consisted of the highest ethical standards in our corporate policies, the way we do business and our behavior. In other words, it is moral standards manifesting themselves in every field in our business life. To fully reflect an ethical understanding of doing business beyond moral traditions and values to our company units, technological assets, financial and operational activities, briefly to all our business processes...

OUR VALUES

WE	SLOVE	EXECUTE	DEVELOP	SINCERELY
Let's Participate Let's Share Let's Enjoy	Let's Imagine Let's Be Agile Let's Be Efficient	Let's Measure Let's Compare Let's Follow Up	Let's Learn Trough Curiosity Let's Teach With Enthusiasm Let's Change Bravely	Let's be Open Let's Be Fair Let's Be Courteus Let's Be Humble
LET'S TAKE OWNERSHIP!	LET'S DO IT!	LET'S BE SUSTAINABLE!	LET'S PROGRESS!	LET'S BE HONEST!

ETİK İLKELERİMİZ

GLOBAL	✓ We carry out all our activities in compliance with Doğuş Otomotiv's mission and goals as well as the basic Principles of the United Nations Global Compact.
INTEGRITY, HONESTY, TRANSPARENCY	✓ We pursue the principles of integrity, honesty and transparency in all our conducts within Doğuş Otomotiv's sphere of impact.
FAIRNESS AND EQUALITY	✓ We treat all of our stakeholders and each other fairly and ensure to avoid discrimination.
RESPECT FOR RIGHTS	✓ We respect reputation, property and all other human and commercial rights of others.
INDEPENDENCE	✓ We make decisions independent from individuals and organizations outside the corporation.
DIVERSITY	✓ We respect different cultures and viewpoints.

OUR POLICIES

Our Corporate Compliance Policy

Doğuş Otomotiv's Corporate Compliance Policy, designed to ensure compliance with the current legal legislation, Doğuş Otomotiv's Code of Ethics, global standards and codes voluntary in nature, as well as to prevent possible violations and to take necessary measures, contains inclusive and regulatory policies that include, our employees being in the first place, all our business partners and stakeholders in our entire value chain.

Doğuş Otomotiv's Corporate Compliance Policy institutes the foundations for realizing Doğuş Otomotiv's corporate business ethics philosophy. Carried out in line with the legal legislation that we committed to comply with at every stage of our business activities and our Code of Ethics, this policy includes the following basic principles:

- We comply with all legislative regulations with a high level of ethical understanding, and manage compliance processes as part of risk management by taking the necessary precautions.
- As a significant representative of the global business community in the world, we support all principles present in the Universal Declaration of Human Rights and declare that we are against discrimination at every stage of our business activities.
- We commit to comply with fair trade principles included in the United Nations Sustainable Development Goals in all lines of our business.
- We comply with all legislative regulations regarding the protection of the ecological environment in regions where we operate, and we make diligent efforts to reduce our environmental impact.
- In accordance with the relevant legal legislation, we protect corporate, personal and asset information we acquire as a result of our activities and take all measures regarding information security.
- While taking necessary precautions concerning the health and safety of our employees, we provide the best working conditions for them, we manage and supervise required processes to prevent unethical behaviors that may put our company's reputation and assets at risk.
- We declare that all executives of our company are role models in compliance, as well as undertake all responsibilities to ensure that the Doğuş Otomotiv Code of Ethics is fully understood throughout the company internally and externally.

Doğuş Otomotiv Corporate Compliance Policy, together with the Doğuş Otomotiv Code of Ethics to which it is affiliated, are regularly reviewed in line with changing processes, developments, expectations and legislative regulations, and are updated as predicated by those terms and conditions.

Our Economic Development Policy

We apply the following policy in order to sustain the economic prosperity of Doğuş Otomotiv as well as all our stakeholders.

- By applying systems such as lean management, budget management and efficiency cards we use our resources efficiently.
- We accept economic fluctuations and their consequential causes as industrial risks and make necessary agreements with OEMs (Manufacturers) through budget and risk management in to manage (minimize) those risks, take appropriate financial measures, and update them according to market conditions.
- We consider climate change and its related causes as financial risks, and aim to raise awareness of all our stakeholders on these issues.
- To ensure the sustainability of our Authorized Dealers and Service Centers, we set and measure the required standards, make necessary contributions to their development, and provide audits.
- Through our Authorized Dealers and Service Centers, we contribute to local employment in regions where we operate.
- We provide equal opportunities for all our suppliers.
- We adopt and abide by global standards and policies implemented by our most important suppliers, OEMs. We prepare action plans with respect to the conditions considering the current global state of OEMs.
- One of the main indicators of Doğuş Otomotiv's economic responsibility performance is the economic value it creates for its key stakeholders.

Our Market Presence Policy

- As one of the leading companies instrumental in economic development of the regions where it operates, Doğuş Otomotiv is committed to increasing local employment, supporting economic empowerment of its employees and contributing to the rejuvenation of local economies through its supply chain. In this direction, it continued to contribute to local employment through new investments made during the year.
- Doğuş Otomotiv, within the scope of its human resources policy it carries out in line with the principle of "equal rights for equal work", does not discriminate in determining the wages of employees. Our full and clear policy regarding the issue has been disclosed to the public in the Doğuş Otomotiv Code of Ethics.
- Doğuş Otomotiv Kocaeli Şekerpınar Central Campus is the area of activity where our Company's operations are carried out most intensively. Even though located outside of Istanbul geographically, it acts as a central base for our Company due to its logistical proximity to Istanbul and being one of the control points of the Marmara Region. Employment policies in Şekerpınar Campus, which hosts all of the administrative structure and logistics operations, are aimed at providing employment for people coming from areas close to the region. However, our employees, who are based in Istanbul, are also considered within the scope of local employment. In this context, our employees working at the Şekerpınar campus were recruited in accordance with local employment policies.

- Doğuř Otomotiv invested in a new center in 2014 under the name of "Value and Interest Center (DIM)" to listen to customer complaints and wishes, coordinate roadside assistance services, and conduct customer surveys. Recruitments at DIM, which provides 24-hour service to our customers, are also in line with local employment policies.
- The wages of employees at Doğuř Otomotiv are determined by considering the balances of the industry by making regional benchmark studies. Doğuř Otomotiv employees' wages are generally above legal limits and industry averages.

Our Indirect Economic Impacts Policy

- Doğuř Otomotiv retains a direct economic impact on the society in regions where its operations take place. In addition to contributing to local employment, Doğuř Otomotiv also attaches great importance to the products and services it procures which are needed to continue its operations, to be the products and services provided by local companies. At the same time with its constantly developing and growing Authorized Dealer and Service Center network, it continues to be one of the supporters of development in every region of Turkey in creating new regional employment.
- Doğuř Otomotiv, at the same time, is an active player in cooperation platforms as a supporter of many initiatives and ventures that contribute to the society, the improvement of the business world, the development of the economy, and finding solutions to the problems of the industry.
- Doğuř Otomotiv, together with its subsidiaries and affiliates, is a part of a large supply and economic chain.

Our Environment and Energy Policy

Doğuř Otomotiv aims to carry out activities that will meet the expectations of all relevant parties, prevent negative effects on the environment and manage energy consumption with high efficiency at every stage of the activities it engages and services it renders in the sales and service segment of the automotive industry. In this context, our main goals are;

- To arrange or design our working environments in a way to prevent environmental accidents/pollution,
- To reduce the possible negative environmental impacts of our services and activities,
- To contribute to the reduction of the effects of global warming by increasing energy efficiency,
- To set our waste yield to zero and increase our waste recovery rate,
- To prefer to utilize new methods or technologies with environmentally friendly and energy efficient sets of equipment,
- To increase the utilization rate of renewable energy resources and to reduce their consumption by using natural resources efficiently,
- To make an environmentalist perspective a corporate culture by increasing awareness efforts,
- To steer our stakeholders, from whom we supply goods and services, to carry out their activities with a safe and environmentally friendly perspective,
- To fulfill all national and international legal requirements and obligations that we are under their scope or a party of,
- To continuously improve the performance of our environment and energy management system by ensuring the participation of all our employees and taking their opinions regarding the effectiveness of our activities,
- To ensure that no living thing is adversely affected by our products and business activities.

Doğuř Otomotiv determined its material issues in 2010 in line with its environmental responsibility policy, which was renewed in 2017.

Doğuř Otomotiv's environmental responsibility policy and its objectives related to this policy are monitored and managed by the Corporate Governance and Sustainability Committee, subordinate of the Board of Directors.

Doğuş Otomotiv is a company that operates in the sales and service segment of the automotive industry. In this regard, it is the company that has published a sustainability report by conducting a materiality study and using global standards for the first time in the world and in Turkey in the field of Sustainability. For this reason, determining environmental priorities specific to our industry, being a role model incidentally and determining the strategic steps of our industry towards sustainability are among the firsts we have realized as Doğuş Otomotiv.

The environmental impacts of our company throughout its business life cycle are grouped under five main headings:



Doğuş Otomotiv
Environmental Impact-Business Life Cycle

Doğuş Otomotiv has fully integrated its life cycle into environmental management systems and by performing life cycle analyses, it imports environmentally friendly products that all have been assessed in terms of their environmental impacts; it also engages in sales and renders services in line with processes that are meticulously controlled by OEMs.

Together with the environmental management system that we improve every year, in addition to our Company, we work to increase the environmental responsibility awareness of our Subsidiaries, Authorized Dealers and Service Centers in our value chain, as well as our suppliers of which we assume responsibilities.

At Doğuş Otomotiv, environmental policy and related issues are monitored by our Environmental Specialist, and data collection, improvement and planning studies are carried out in coordination with the Sustainability Council.

We aim to increase our efforts to minimize our environmental impact every passing day, both with the environmental responsibility studies of our brands and with the environmental awareness we try to create in our Authorized Dealers and Service Centers.

Our Sustainable Purchasing Policy

Sustainable purchasing policy evaluates, controls and regulates that its suppliers and business partners have management processes with reduced risks in social, environmental, ethical and economic areas with which Doğuş Otomotiv and Doğuş Oto work with, while purchasing goods and services needed for conducting their activities in accordance with the strategic sustainable principles and guidelines.

The purpose of this policy is to set forth the expectations of Doğuş Otomotiv and Doğuş Oto from their product and service providing business partners in purchasing goods and services, as well as to establish basic principles and guidelines in line with these expectations, and to organize supply chain and purchasing activities in accordance with sustainable purchasing management policies.

The foundation of the Sustainable Purchasing Policy is based on establishing, managing and developing long-term business relationships, in line with the general policies and strategies of Doğuş Holding, Doğuş Otomotiv and Doğuş Oto, in compliance with Doğuş Otomotiv Code of Ethics and Procurement Procedures, based on processes in line with the United Nations Global Compact, and relying on mutual trust and cooperation with existing and potential business partners.

Accordingly, Doğuř Otomotiv and Doğuř Oto request from their suppliers and business partners to;

- Have business processes that are compatible with sustainability principles,
- Regularly monitor their impacts on the ecological environment while conducting their business and to work to reduce this impact,
- Carefully follow the social, environmental and ethical areas in their investment processes and to be responsive in these areas,
- Regulate their working conditions and ethical processes within their establishments in accordance with the principles of sustainability.

During the purchase of goods and services, any action that prevents the fair and impartial conduct of the process is prohibited. If said actions are determined to be carried out by the candidate company/companies, they are excluded from the purchasing process at once. For goods and services, whether there are new company/companies that produce/market the goods or services at regular intervals is thoroughly scrutinized.

In purchases, besides price and payment conditions, the candidate company's social, environmental and ethical processes are also considered. Following issues are taken into account while choosing among the candidate companies:

- Intelligence collected about the company, its technical and financial competence, its commercial reputation and its standing in the market, its experience, references, its relations with Doğuř Otomotiv and Doğuř Oto,
- Being an institution that is able to provide competitive conditions and attach importance to research and development in order to specialize in its own field,
- The following conditions of the goods or services to be purchased from the company are also taken into consideration;
- Whether or not these goods and services are within the main field of activity of the company and whether they are directly provided by the company,
- Their compliance with quality and standards, technology level with which they are produced and guarantees they have (TSE, ISO, etc.),
- If they are meeting the needs,
- If they are produced in accordance with national and international standards on Environment and Occupational Safety and if they have a service or production process that respects human health and ecological environment,
- If they have short delivery and maintenance times, provide technical support and spare parts, if the offered price and price are kept constant for a certain period, etc.

All correspondence exchanged with companies and offers received during the purchasing process are made in accordance with the corporate correspondence rules of Doğuř Otomotiv and Doğuř Oto; in addition, all purchases of goods and services made by the units performing the purchasing transactions are recorded electronically.

Every employee involved in the purchasing processes of Doğuř Otomotiv and Doğuř Oto is obliged to carry out the purchasing processes in line with the following principles.

They are responsible for conducting the activities of Doğuř Otomotiv and Doğuř Oto in accordance with the principles of sustainability, reducing social, environmental, ethical and economic risks, reducing the risks of its suppliers and business partners in these areas and increasing their awareness. Employees managing the process should investigate whether there are different areas to be evaluated according to the type of product and service, such as the following.

- If that good/service is absolutely necessary to be purchase,
- If the waste generated as a result of the purchase is at a minimum level (and/or contributes to the reduction of waste),
- If they reduce risks related to climate change, provide a positive impact on them and/or are impact-free,
- If they have a positive effect on the productivity (financial or non-financial efficiency),
- If they have a positive effect on the use of natural resources,
- If they are compliant with all laws and regulations related to occupational health and safety, to have their effects evaluated on the health and safety of Doğuř Otomotiv and Doğuř Oto employees.

All processes must comply with Doğuř Otomotiv and Doğuř Oto Code of Ethics, the supplier or business partner must have full knowledge of the Code of Ethics and commit to full compliance.

Establishing long-term business relationships (or working) with companies that produce and provide services in accordance with national and international standards on Environmental and Occupational Health and Safety issues and companies which have a modern management approach is preferred.

Our Product and Service Responsibility Policy

Doğuř Otomotiv monitors social and environmental impacts of its products and services; it is aware of its responsibility towards all social stakeholders and the ecological environment. Doğuř Otomotiv adopts and implements the following policy as a part of its Main Principles of Product and Service Responsibility framework:

- Manages, controls and continuously improves the processes related to customer health and safety.
- For all stakeholders who are directly or indirectly affected by its products and services, applies international standards for their training and discloses accurate information to them.
- To serve beyond expectations, focuses on choosing the right equipment, offering reasonable prices, correct launch, training of Authorized Dealers and Service Center personnel and informing customers accurately.
- Constantly monitors its service standards and aims to reach the highest standards in customer satisfaction by taking special actions on issues that need improvement.
- Adopts, beyond the requirements of laws and regulations, responsible communication principles, observes OEM standards in line with the values and expectations of the brands it represents.

Our Employee and Workplace Policy

Doğuř Otomotiv;

- Uses measurable recruitment tools to be transparent and traceable in recruitment processes. By evaluating them with the relevant department manager, it recruits employees who have competence as stated in the job description.
- The aim of the human resources policy is to increase employee loyalty and to ensure sustainable productivity. To achieve this, stakeholder - priority analysis, employee satisfaction and loyalty surveys are conducted, and improvement programs are implemented according to the results.
- With the zero-incident target, takes lessons from the past experiences and improves the processes. Implements the programs required for the accident results to be traceable and accountable.
- Cares about the development of awareness among its employees regarding social health and safety. For this reason, it organizes informative, consciousness and awareness-raising seminars. These studies are implemented systematically and in a planned manner.
- Implements various programs and sets goals to increase the quality of life and social welfare of its employees and to make the working environment more efficient.
- Prioritizes transparency in all processes of employee practices. Monitors legal processes regarding discrimination and follows the data.
- Cares about communication with its employees, queries their expectations regularly and implements an open-door policy.
- Determines key performance indicators to achieve the "Great Place to Work, Best Employer" targets in local and international platforms.

Our Equal Pay for Equal Work Policy

Believing that the correct remuneration management system is 'equal pay for equal work' calculated using job valuation method for each position, Doğuř Otomotiv supports the remuneration system with regional and industrial analyzes, and carries out necessary studies to create a competitive system compatible with the market. As in all processes of Doğuř Otomotiv, the principle of equality is accepted as a prerequisite in remuneration processes.

Assessment of Suppliers in Terms of Labor Practices Management Approach

Doğuş Otomotiv added Sustainability-related areas among its audit criteria in supplier audits in 2014. Our suppliers to provide legal and social rights to their employees is also among these criteria.

Labor/Management Relations Management Approach

Doğuş Otomotiv's primary key stakeholder is its employees. There are different dialogue platforms at Doğuş Otomotiv and Doğuş Oto where employees come together both within themselves and with managers and senior management. All of these platforms enable our employees to convey their opinions and suggestions directly to senior management and to receive information about the company, targets and strategies from the top management. Sharing changes, strategies and targets related to our activities in our company with our employees is among our internal communication strategies. Furthermore, Doğuş Otomotiv intranet system is actively used for such announcements. Legal notice periods are complied with in Doğuş Otomotiv.

Our Occupational Health and Safety Policy

Health and safety of our employees is considered among the top priorities in our company. Employee health and safety also plays a critical role for our company to pursue its business activities successfully. The basis of our Occupational Health and Safety policy is the principle of "Safety First". Providing necessary information to our employees, offering the required trainings regularly and continuously, creating a healthy and safe work environment is also an important principle of our "Employees and Work Environment Policy" and is an important element for ensuring business continuity.

As in all policies of Doğuş Otomotiv, stakeholder engagement understanding has an important place in Occupational Health and Safety Policy. The main axis of our policy is to follow the best practices in the world regarding the health and safety of our employees, to carry out improvement studies by consulting our employees' opinions, and to be "accountable" in all processes.

Occupational Health and Safety issues, which we primarily address to anticipate our risks within the scope of our sustainability strategy, to become the most preferred company and to increase the satisfaction and loyalty of our employees to the company, are managed in line with the following principles:

- We prioritize occupational health and safety aspects at every stage of our activities and manage them with a risk management perspective.
- We comply with health and safety laws and regulations, social norms, generally accepted business practices and safety standards at every stage of our business.
- We implement practices related to occupational health and safety in line with the systems and processes in which our employees are directly involved.
- We provide all the necessary operational support for all our employees and managers to pay maximum attention to the zeroing of work-related accidents and lost day rates and to reduce job-related and occupational diseases by fully complying with the processes related to occupational health and safety.
- To guarantee the health and safety of our employees, we meticulously manage the issues of providing regular trainings, monitoring quality processes, sharing possible accident reports with open communication, exchanging information with sampling, exercise studies, like all our processes.
- We regularly review our Occupational Health and Safety Policy in order to adapt to operational changes in our business and the industry and to improve our processes in line with new needs, and make changes when necessary.
- We run the necessary information and warning mechanisms to ensure that our stakeholders, including Doğuş Otomotiv's suppliers, business partners and customers, comply with all the aspects of this policy.

The Administrative Affairs Department is responsible for the implementation of Doğuř Otomotiv's Occupational Health and Safety policy, and the General Manager of Human Resources and Process Management takes part on the Executive Board as a Member of the Executive Board.

Doğuř Otomotiv transparently shares its data on Occupational Health and Safety within the scope of its Sustainability Report every year.

Training and Learning Management Approach

Doğuř Otomotiv considers supporting its employees both professionally as well as personally and socially as a part of its human resources policy. For this purpose, it applies a training and learning policy in line with not only the Company's priorities but also the expectations of the employees. It regularly questions these expectations and demands and develops education models accordingly.

Our Performance Management Policy

Our Performance Management System consists of 3 periods: target entry period, target revision period and performance evaluation period. The follow-up and coordination of the performance process of all employees is carried out by the Human Resources Unit. Compensation and bonus system management is provided through performance outputs.

Training and rotation requests of employees are taken over the D-İnsan (D-Human) performance system and the plans for training and rotation are made accordingly. After the performance evaluation period, career and succession plans are made based on brand/department with managers, directors, and general managers over the general performance status of people working as their subordinates. Evaluations are made based on these plans for in-house assignments and position changes. Furthermore, compulsory and optional trainings were determined based on the titles and the participation of employees in these trainings was ensured.

Our Human Rights Policy

Doğuř Otomotiv;

- Bases its commitments regarding Human Rights on the United Nations Global Compact it has signed, and the United Nations Universal Declaration of Human Rights.
- An integral part of its Ethical Principles is human rights and expects all employees and business partners to comply with these principles as well as Doğuř Otomotiv Human Rights policy.
- Complies with national and international laws and regulations related with human rights, and expects business partners to do as well.
- Observes the rights of the people living in the regions where it operates, takes measures against rights violations, manages the related risks.

Human Rights in Investments Management Approach

Doğuř Otomotiv pledges to take decisions in line with the United Nations Universal Declaration of Human Rights in all its activities and operations covering these activities, and to organize all its activities accordingly. At the same time, due to the 1st and 2nd articles of the United Nations Global Compact, it has clearly declared its commitment on this issue.

Child Labor Management Approach

As a signatory of the United Nations Global Compact, Doğuř Otomotiv does not allow child labor at any stage of its activities under no circumstances. Service Center Regional Managers are informed and support is provided during the process of recruitment requests of our Authorized Services. This issue is secured in contracts entered with our suppliers, and is considered as an important item during annual audits.

Forced and Compulsory Labor Management Approach

As a signatory of the United Nations Global Compact, Doğuř Otomotiv does not allow forced or compulsory labor under conditions that do not comply with laws and regulations at any stage of its activities. This is also valid for Doğuř Otomotiv's suppliers and all its subsidiaries and affiliated partners. Our supplier audits contain relevant content.

In our company, every employee is insured as of the day they start working. This issue is controlled by both internal and external audits. Employees are informed about overtime working conditions during their job initiation process and their approval is obtained within the scope of the employment contract. Doğuř Otomotiv also expects the same sensitivity from its Authorized Dealers and Service Centers as well as suppliers within its impact and conducts the necessary inspections.

Security Practices Management Approach

In regions where Doğuř Otomotiv operates, security services are procured from third party companies. As with all our suppliers, Doğuř Otomotiv principles and policies have been shared with our supplier providing security services within the scope of a protocol, and the necessary information has been provided.

Local Community Rights Management Approach

Respecting all the rights of the local community living in the regions where we operate, Doğuř Otomotiv attaches particular importance to the way of doing business called "social approval".

Assessment of Suppliers in Terms of Human Rights Management Approach

Starting from 2014, Doğuř Otomotiv has added articles that contain social, environmental and ethical concerns, including human rights, to its supplier assessment process.

Our Community Engagement Policy

Doğuř Otomotiv;

- Appreciates the importance of safety in traffic and the value of human life. It is committed to providing necessary services for its products and services to have high standards and to maintain these features throughout their life cycle.
- Its employees set an example for the importance of safety in traffic and behave responsibly.
- Undertakes that the products it sells meet the high standards related to customer health and safety.
- Is obligated to provide high quality and high standards of maintenance and repair services, limited to legislative regulations, in order the products it sells to maintain these standards throughout their economic lives, if its distributorship continues within the scope of distributorship agreements.
- Conducts and manages continuous information and awareness-raising activities on safety in traffic in dialogue and cooperation with relevant institutions and organizations.
- Ethical principles are clear and accessible and are supported by multiple participation. They are approved by the senior management and are one of the main elements of corporate governance principles.
- Continues its efforts to make the ethical principles a comprehensive framework that includes all processes.
- Acts away from unethical concurrences such as fraud and corruption, and provides necessary information for its employees to become aware of this issue and to assume responsibility. Starts studies and sets goals to establish mechanisms to prevent fraud and corruption.

Local Community Management Approach

Doğuř Otomotiv continues to render its services under safe, humane and ethical working conditions. It is equally respectful to the rights of the people living in the regions where it operates. Our company's environmental and social responsibility policies directly include the principles necessary for the welfare, development and improvement of the society in which they live. In this context, it cooperates with various institutions and organizations and carries out studies to contribute to economic and social development.

Social, environmental, economic and ethical expectations of the society from Doğuř Otomotiv are scrutinized through various perception researches and surveys throughout the year and these expectations are integrated into our corporate strategies.

Doğuř Otomotiv does not have a business activity subject to environmental and social impact assessment.

Anti-competitive Behavior Management Approach

Doğuř Otomotiv strictly complies with all laws and regulations that regulate anti-competitive behavior, anti-trust or monopolistic practices.

Our Customer Health and Safety Policy

Doğuř Otomotiv strives to provide the highest quality and reliable service to its customers with the responsibility of being one of the leading automotive distributors and service providers of Turkey. Health and safety of our customers is our top priority in the entire life cycle of our operations. Quality controls performed at every stage of production by the world's leading automotive manufacturers that we distribute and the sensitivity they display to customer safety bring our company, as Doğuř Otomotiv, the responsibility to organize our business activities with an understanding of superior service. Doğuř Otomotiv's understanding of "service above expectations" is the most significant reflection of this responsibility.

In line with our customer satisfaction-oriented strategies, by reviewing all our processes, necessary improvements are provided to ensure that our customers are satisfied with the products and services they receive from Doğuř Otomotiv, that they can submit all their suggestions and complaints directly to our Company, and to receive the support they require.

Product and Service Labeling (Information) Management Approach

Doğuř Otomotiv carries out the distributorship and service of brands that have quality control processes at international standards. In terms of informing users about its products and services, processes are also managed in accordance with the standards of the manufacturers. Documents are provided to inform our customers fully and accurately about all our products and services.

Marketing Communication Management Approach

Doğuř Otomotiv complies with laws and regulations in all marketing communication activities, including advertising, sponsorship and promotions.

Our Diversity and Equal Opportunity Policy

Doğuř Otomotiv does not allow its employees being discriminated with the Code of Ethics and discrimination between Employees in line with its Workplace Policy under any circumstances and carefully monitors and manages all processes in this regard.

- As one of the members of the Equality at Work Platform in Turkey, Doğuř Otomotiv contributes to increasing women's employment and creating equal opportunities for women in the business environment not only within the Company internally but also at national level.
- For Doğuř Otomotiv, the concept of "diversity" means; accepting the religious, structural and cultural differences of employees, customers, suppliers and other social stakeholders and valuing all these diversities.

- DoğuŖ Otomotiv, in addition to attaching importance to diversity, it also believes that diversity is a significant element is a corporate wealth.
- DoğuŖ Otomotiv, regardless of their different cultures and origins, is committed to being the most preferred employer for all highly qualified candidates who are devoted to their work, and a company which develops its employees and protects their rights.
- DoğuŖ Otomotiv implements an “Employee and Workplace Policy” independent of religion, language, race, color, gender, age, ethnic origin, disability, citizenship or other social status protected by legislative regulations. Our company participates in events that comply with its own policies, undertakes sponsorships, becomes a member of institutions and organizations and cooperates only with institutions and organizations with this understanding.

Our Anti-Bribery and Anti-Corruption Policy

The most valuable asset DoğuŖ Otomotiv has is the trust of its customers, suppliers, employees and shareholders in our Company, and our corporate reputation that we have gained since the day we started business. Maintaining the trust and reputation of our stakeholders are our reasons for existence that we will never allow to be compromised.

DoğuŖ Otomotiv, in line with its policies and corporate ethical understanding, strongly rejects bribery and corruption.

- DoğuŖ Otomotiv is committed to complying with the principle of conducting fair and transparent business in its relations with all its stakeholders.
- DoğuŖ Otomotiv’s managers and employees, as well as its business partners, in their relations with government institutions as with other stakeholder groups, are strictly forbidden to make any payments, give gifts, offer to make payment or give gifts, or to make commitments for similar purposes in order to gain an advantage that is contrary to laws and regulations, or to influence the decisions of individuals or institutions.
- As a representative of DoğuŖ Otomotiv, donating, giving gifts or making commitments to a political party or a member of a political party or their affiliated institutions and organizations, is also against the DoğuŖ Otomotiv Code of Ethics.
- At DoğuŖ Otomotiv, offering, taking or giving bribes or kickbacks that constitute a legal crime is strictly prohibited. All managers and employees who encounter such an offer are obliged to immediately report the situation to the Ethics Line. It is also strictly prohibited to request personal loans from customers, suppliers, DoğuŖ Otomotiv competitors and other third parties, or to request special privileges or discounts other than those offered to everyone. DoğuŖ Otomotiv employees are not imposed with a disciplinary penalty for refusing to take bribe or for whistleblowing against a corruption incident, in any way.
- DoğuŖ Otomotiv Anti-Bribery and Anti-Corruption Policy and the commitments within the scope of this policy include employees, managers, senior management, suppliers and business partners, Authorized Dealers and Services and their employees as well as all third parties within the entire DoğuŖ Otomotiv value chain.
- DoğuŖ Otomotiv Board of Directors is responsible for the implementation of anti-bribery and anti-corruption policy within the entire DoğuŖ Otomotiv value chain.

DoğuŖ Otomotiv acts in compliance with OEM policies in determining Authorized Dealers and Service Centers and in terms of paying their compensations. DoğuŖ Otomotiv makes payments to Authorized Dealers and Services only in accordance with these standards and in return for legal services.

Prevention of Laundering Proceeds of Crime and Financing Terrorism Policy

Doğuş Otomotiv's policy for the prevention of laundering proceeds of crime and financing of terrorism is based on; international initiatives, conventions and regulations to which our country is a party of, internationally accepted approaches, methods and practices on this subject, current legislation concerning this matter, and its belief and determination to protect the reputation and trust of the Company brand.

All operations we carry out as Doğuş Otomotiv, our international business activities (import-export, etc.) must reflect the value of the services provided in real terms, be directed to the right and appropriate purposes, should be carried out with legal service providers and third parties, and comply with the laws and regulations of the Republic of Turkey as well as the countries where we do business.

Regarding the Prevention of Laundering Proceeds of Crime and the Financing of Terrorism, our company acts in accordance with the Law No.5549 of the TR Ministry of Treasury and Finance and the regulation dated 9/1/2008 and numbered 5337; this applies to all Doğuş Otomotiv employees and representatives, as well as all its shareholders, agents and business partners acting on behalf of Doğuş Otomotiv.

Doğuş Otomotiv's managers and employees at all levels fulfill all their duties and responsibilities accurately and carefully, by acting in accordance with the purpose of this policy and effectively, in order not to expose the company to the risks related to laundering proceeds of crime and financing of terrorism. As a Doğuş Otomotiv employee, you should not make a payment that you suspect will be directed to a different person, institution or organization to third parties located in and/or outside of these regions. You should not use an intermediary for any payment that Doğuş Otomotiv cannot directly make itself. If you have to do business with any intermediaries, you must ensure that this payment is not used to make improper payments to government officials or representatives.

You may contact the Compliance Function to evaluate compliance with company policies and procedures, laws and regulations in doing business with authorities outside the Republic of Turkey or other institutions and organizations.

MESSAGE FROM THE CEO

Dear fellow co-workers,

Since the first day of its foundation, our company has continuously progressed with the values and corporate culture it has strictly embraced and set an example among its peers. We are aware that, under today's conditions, the way to carry our Company to the future as a symbolic power, requires performing our duties duly, honestly and correctly. From the perspective of all our stakeholders in the automotive value chain, Doğuř Otomotiv conducts its activities with highest ethical standards, always fulfils its commitments, and is a trustworthy company. Our revered reputation is an outturn of the business conducted in line with our company's ethical management culture. Our primary goals are to successfully continue our operations in the current economic and competitive environment and maintain our industrial leadership position. We are recognized as an honest, trustworthy brand, never compromising its ethical rules. In business life where success and reputation are strongly interlinked with each other, I believe that we, as members of the Doğuř Otomotiv family, should adopt and fulfill the Doğuř Otomotiv Code of Ethics, its policies and principles with a full sense of responsibility.

Doğuř Otomotiv Code of Ethics and the principles and policies we publish within the scope of this code pledge that our Company will maintain its relations with its customers, business partners and competitors through developing honest and ethical demeanor. Doğuř Otomotiv adopts the understanding of doing business ethically at the highest standards as the basic building block of its growth-oriented future strategy. With Doğuř Otomotiv Code of Ethics, our Company firmly rejects any and all unethical ways of doing business.

Under the scope of the Code of Ethics prepared by Doğuř Otomotiv, we aim to provide you with useful and enlightening information regarding what to do in any ethics-related problem that you may encounter. Doğuř Otomotiv Code of Ethics will guide us, the employees and business partners of our Company, to fully understand and apprehend the way our Company does business. Please consider this code as a resource that sheds light on your business processes and do not neglect to use this valuable resource often.

As we all know, each of us carries the responsibility for our own actions.

Sometimes, however, certain problems may arise without our intention that can be deemed unethical. As Doğuř Otomotiv, we believe that each of our employees and business partners will benefit from our Code of Ethics to support one another and to carry our Company to an even stronger and more successful position. We are greatly confident that you will fulfill your responsibilities in the most adequate manner.

Faithfully yours,

E. Ali Bilalođlu

CONTENTS

ETHICAL BUSINESS CONDUCT APPROACH	17	Proper Use of Company Assets	37
CODE OF ETHICS IMPLEMENTATION GUIDE	19	- Employee Benefits	38
I. EQUAL AND HEALTHY WORK ENVIRONMENT	21	- Proper Use of Company Property and Assets	39
Diversity and Respect to Equal Opportunities	21	- Working Hours	39
Discrimination and Harassment	21	Use of Communication and Information Systems of the Company	39
Violence at the Workplace	22	- Prohibited Actions	40
Workplace Safety and Environment	23	Security of Company Buildings and Operations	41
Harmful Substances, Narcotics and Gambling	24	Intellectual Rights	41
- Alcohol	25	- Proper Use of Intellectual Rights of Third Parties	41
Aids and Fundraising	26	- Information Security of Your Former Employers	41
Confidentiality of Employee Information	26	Use of External Communication Mechanisms and Social Media	41
Surveillance at Work	27	IV. HONESTY AND FAIRNESS IN THE MARKETPLACE	43
The Use of Recording Devices	27	Customer Relations	43
Non-Ethical Behavior Out of the Workplace	28	- Security of Customer Information	43
II. HONESTY AND FAIRNESS IN THE WORK ENVIRONMENT	29	- Fair Marketing, Fair Sales	43
Preventing Conflicts of Interest	29	- Relations with Government Institutions	45
Personal Conflicts of Interest	29	Selection of Suppliers and Supplier Relations	45
Working Externally Out of the Company	30	Receiving and Giving Gifts	46
Other External Activities	31	- Acceptable Gifts	46
Political Conflicts of Interest	31	- Acceptable Events	47
Personal Political Activities	31	- Prohibited Exchanges	47
Use of Corporate Assets for Political Support	32	- Returning Gifts	47
Relations with Public Institutions	32	- Accepting Gifts outside the Workplace	48
Insider Trading and Financial Activities	32	- Accepting Gifts or Event Invitations from Public Officials	48
- Investing in Establishments That Have First Degree Affiliation with Doğuř Otomotiv	33	Bribery, Corruption, Commissions and Borrowing	48
- Financial Relations with Specific Organizations	34	Relations with Employees who Are About to Leave or Already Left the Work	48
- Investment Transactions	34	Relations with Competitors	48
- Credit and Debt	34	- Avoiding Situations in Violation of the Competition Law	49
- Notifications Obligatory for Our Employees	34	- Collecting Information about the Competitor	50
III. PROTECTING THE ASSETS AND REPUTATION OF DOĐUŐ OTOMOTIV	35	Relations with Subsidiaries	51
Accurate and Valid Data and Records	35	Relations with Related Parties	51
Transparent and Full Disclosure	35	International Relations	51
Safety of Company Records	36	- Services Rendered from Abroad	51
Protecting Company Records	36	- Compliance with Laws and Regulations	51
Protecting Company Information Not Disclosed to the Public	36	- Import/Export Control	51
Protecting Information of Other Establishments Not Disclosed to the Public	37	CONCLUSION	52
		CODE OF ETHICS PROCESS	53

ETHICAL BUSINESS CONDUCT APPROACH

Definitions

Systemic Ethics

Systemic Ethics is acting according to Doğuş Otomotiv Business Ethics Approach in matters related to economic, political, legal and other social systems within the scope of our activities.

Corporate Ethics

Doğuş Otomotiv employees and all the stakeholders should act and behave honestly, transparently, reliably, fairly, independently and properly beyond corporate, legal and social moral standards, in their business conduct and general lifestyles.

Personal Ethics

Doğuş Otomotiv is aware that personal ethical approach may depend on the society, environment or living conditions of an individual. Nonetheless, our corporate values and our ethical principles, identified in Doğuş Otomotiv's Code of Ethics, clearly demonstrate the perspective of our company towards ethics and implementation norms. Within the scope of Personal Ethics, Doğuş Otomotiv expects all our employees and stakeholders, whose personal values we fully respect, to act according to these values and principles.

Proper Demeanor

Doğuş Otomotiv is steered with a management approach in line with open door policy. You are always free to share your thoughts, as long as these are suitable to the general framework of personal and societal ethical rules. You should report situations in violation of our company policies, code of ethics or legislative regulations. Doğuş Otomotiv's related units and departments or Disciplinary Committee will do the necessary research and execute required actions for circumstances considered as infringement.

If you suspect that an infringement has occurred, or is about to occur, you should ask yourself the questions below:

- Is the act I witnessed an honest act? Is it unethical?
- Can this act harm Doğuş Otomotiv?
- Can this act harm the reputation of Doğuş Otomotiv from the perspective of its customers, shareholders, investors and other stakeholders?
- Can this act harm other colleagues, investors or customers, suppliers or other people?

If you answer any of the questions above with "Yes" or "Maybe", you should report

the act you witnessed to your immediate supervisor and/or manager next in line or Ethics Line.

Trust and Reputation

The most valuable assets of Doğuş Otomotiv are the trust of its customers, suppliers, employees and shareholders to our Company, and the corporate reputation we have acquired since the inception of our commercial activities. Our stakeholders' trust and the protection of our reputation are the reasons of our existence that we never compromise.

If you hold a managerial position at Doğuş Otomotiv, your most important responsibilities include:

- Providing the most comfortable environment for your subordinates to communicate directly with you,
- Making them feel that they will get their questions answered without reservation,
- Listening to their concerns and worries, and comforting them,
- Creating an open, transparent, and fair environment for reporting cases in violation of Code of Ethics.

Please note that, all employees take their superiors as a primarily example for correct behavior patterns.

Therefore, being a 'role model' about compliance with ethical rules, deciding the right behavior and avoiding the infringements should be your priority.

“ Never forget that your acts set a better example than your words. ”

While achieving all its financial, environmental and social targets, Doğu Otomotiv considers compliance with ethical principles and professional behavior as key prerequisites.

- Please read and understand the Ethical Principles of Doğu Otomotiv.
- Make use of right resources.
- Comply with the Code of Ethics in every condition, and assure that others do as well.
- Be honest and transparent with all your behaviors and reports.
- When necessary, ask for help from the people or departments mentioned in the Code of Ethics.
- Immediately report cases, you consider to be in conflict with the code, to relevant unit.

CODE OF ETHICS IMPLEMENTATION GUIDE

Doğuş Otomotiv Code of Ethics and Ethical Principles are your code of business conduct, guiding you at every moment of your work environment. Doğuş Otomotiv believes that all employees make decisions in the soundest way and in compliance with general moral rules. Our most important key expectations from you are being transparent in all your demeanor and reports, and working honestly and ethically.

Doğuş Otomotiv Code of Ethics contains our perspective of corporate responsibility in the complete Doğuş Otomotiv value chain as well as our commitments within the United Nations Global Compact. Our Code of Ethics is approved by Doğuş Otomotiv Senior Management.

Doğuş Otomotiv Code of Ethics is prepared to regulate our employees' behaviors as well as the relations between employees and customers, competitors and suppliers.

Doğuş Otomotiv expects its suppliers, customers, shareholders, affiliates and all other stakeholders to understand the Business Conduct of the Company accurately and shape their expectations accordingly.

Doğuş Otomotiv employees are expected to fully comply with the Code of Ethics in every condition. No employee is exempt from this code. When necessary, provisions of this code can be changed by Doğuş Otomotiv for any reason in compliance with the laws, with or without notification. However, Doğuş Otomotiv is obliged to inform its employees about any such changes.

Doğuş Otomotiv Code of Ethics is published on internet and intranet systems and it is open to public.

Even if it is one of your superiors who asks you to act in violation of any article in the Code of Ethics, you are expected to warn the superior about this matter.

If your superior insists on such a behavior despite your objections, you are expected to act according to the guidance principles within the code.

Acting in violation of Doğuş Otomotiv Code of Ethics or related company policies is considered a serious infringement and may result in enforcements like termination of the contract or legal proceedings, depending on the type and scope of infringement. The enforcements mentioned are not only for the employees who participate in misconduct, but also for those who ignore such a situation, do not report it, do not perform the necessary activities to prevent, catch or denounce the action, or for those who prevent those trying to prevent potential infringements.

Reporting and Denouncement

All employees of Doğuş Otomotiv can report the situations in conflict or potentially in conflict with the Code of Ethics by calling 444 38 45 Ethics Line openly or anonymously when preferred. You can ask for help or support from your immediate supervisor and/or manager next in line directly about issues, which you cannot understand clearly, or you are in doubt with. When necessary, you can also apply to Legal Department for information about legislative regulations mentioned in this code, following company procedures and practices when doing so.

Emergencies or Dangers

Reach out to Doğuş Otomotiv Security employees immediately when suddenly coming across a case in violation of the Code such as offensive or malevolent behaviors, firearms, other weapons or tools, or when detecting a threat against Company safety. Call 155 Police or 112 Emergency Hotline when facing immediate dangers or you personally think it is necessary.

Discrimination or Harassment

In actual or suspected cases of discrimination or harassment, you should report the matter immediately to your immediate supervisor and/or manager next in line, Human Resources Department, or for anonymity, the Doğuş Otomotiv Ethics Line. If your complaints or concerns are about one of your supervisors or if you feel uneasy about sharing the matter directly with your immediate supervisor, you can report to Human Resources Department or Ethics Line. If you think the behavior is unintentional and bothers you even though it is not in conflict with the Code, you can state your discomfort directly to the related person.

Your Concerns about Internal Control and Audit Mechanisms

If you have any questions or concerns about the functioning of Doğuş Otomotiv's financial statements, public reporting, internal controls and audit systems, you can directly contact the Internal Audit Department or call the Ethics Line.

Confidential Notifications

Within the scope of possible investigations that our company may carry out after an infringement notification received about a conduct contrary to the Doğuş Otomotiv Code of Ethics, the identity of the person making the notification is kept confidential to the extent permitted by law and except mandatory situations.

Doğuş Otomotiv proscribes retaliation among employees after any notification, prevents the employee who made the notification from being harmed in any way due to this reporting, and makes no concessions in this regard. If you think you or another person has been subjected to retaliation about a notification made, please apply to your immediate supervisor and/or manager next in line.

Cooperation in Investigations

You are expected to cooperate in an investigation conducted by Doğuş Otomotiv due to a circumstance in conflict with the Code of Ethics. You must be honest and straightforward throughout the investigation and provide all kinds of information and documents requested from you in a timely, complete and accurate manner. You should not disclose any information about the issue to a third party outside the Company until the investigation is concluded, or unless specified otherwise.

SECTION 1

EQUAL AND HEALTHY WORK ENVIRONMENT

- Doğuş Otomotiv Employees should,
- Base all their relationships and activities concerning our Company on honesty and integrity,
 - Comply with all laws,
 - Contribute toward creating an ethical and professional work environment,
 - Comply with Company principles and policies.

Doğuş Otomotiv expects its employees to be respectful to their colleagues, customers and suppliers, and to demonstrate an honest, fair and consistent behavior befitting the brand's reputation.

Diversity and Respect to Equal Opportunities

For Doğuş Otomotiv, the ideal of "diversity" means accepting and valuing the religious, structural and cultural differences of employees, customers, suppliers as well as other social stakeholders. While Doğuş Otomotiv attaches importance to diversity, it also believes that this element is a contributing component to its a corporate wealth.

Doğuş Otomotiv is committed to being the most preferred company for all candidate employees who are dedicated and qualified employment candidates irrespective of their culture and roots, and for its workers devoted to being an employer that develops its employees and protects their rights.

Doğuş Otomotiv implements an "Employees and Workplace Policy" independent of religion, language, race, color, gender, age, ethnic origin, disability, citizenship or other social status protected by legislative regulations. Our company participates in events that comply with its own policies, undertakes sponsorships, joins to institutions and organizations and cooperates only with institutions and organizations that possess this understanding.

SAMPLE CASE 

I am a female employee working at a managerial position at the department. There is also a male colleague at the same position in my department. Although my performance evaluations during the year were better than my colleague's, I think I was subjected to gender discrimination by the male supervisor we are reporting to. How can I find a way out?

ANSWER: All kinds of discrimination are prohibited within Doğuş Otomotiv. You should first share your concerns with your immediate supervisor and/or manager next in line. Describe your reasons and demeanor that concern you, in detail. If you think you could not get a satisfactory response from your manager next in line, please report to Doğuş Otomotiv Ethics Line. You are free to withhold your identity. However, for to share our feedback, we suggest that you do not hesitate to identify yourself.

Discrimination and Harassment

Doğuş Otomotiv is against all kinds of discrimination. It implements a zero-tolerance policy against forms of harassment owing to religion, language, race, color, gender, age, ethnicity, disability, citizenship or other social status. The concept of harassment is not limited to racism, sexual or ethnic content; it includes every type of suppression, aggression or action and verbal abuse (mobbing) containing a form of an insult.

Please notify your immediate supervisor and/or manager next in line or Ethics Line in case of any kind of unlawful discrimination or harassment. In cases where your complaint is related to your immediate superior/manager next in line, or when you encounter a problematic situation while telling your manager about your experiences, you can directly contact the Ethics Line. If you feel that the behavior or statement is unintentional and that you will not feel any discomfort, you can also discuss the matter directly with the person involved in doing this.

SAMPLE CASE

The management in my department, where I have been working for seven years, was changed three months ago. The behavior, attitude and looks of the new supervisor towards me have been distressing since the first day. What should I do?

ANSWER: Since the matter concerned involves your supervisor first in line, you should immediately report your discomfort to the Ethics Line. Please submit your concerns to the Ethics Line with your reasons. You are free to withhold your identity. Measures to be taken or likely to be carried out will not be reflected in your job and your business relations, and except for the cases where legal obligations apply, they will be accessible only to the relevant business unit.

SAMPLE CASE

This fellow worker of mine, who started to work at the same time as I did and graduated from the same school, got promoted in three years. I think I was discriminated against since she/he has good relations with our sales manager and that is why she/he got promoted quickly.

ANSWER: Developing good relationships with your colleagues, as long as they are at the professional level, is a favorable behavior. However, if you observe a relationship beyond professionalism, you should first read the Promotion Procedure developed by the Human Resources Department and discuss with the sales manager the reasons why you were not promoted. If you do not get a satisfactory answer, please submit your concerns to Ethics Line. You are free to withhold your identity. Measures to be taken or likely to be carried out will not be reflected in your job and your business relations, and except for the cases where legal obligations apply, they will be accessible only to the relevant business unit.

Violence at the Workplace

Doğuş Otomotiv does not tolerate threats and harassment, words or behaviors which include hostility or swearing while using company vehicles or in the daily business environment or in any building, office or unit belonging to the company. When such a situation is encountered, starting from dismissing the employee and extending to the initiation of legal processes, which are the actions specified in the company policies and procedures, are taken. In addition, threats and harassment, words or behaviors which include hostility or swearing occurring at any time and place against Doğuş Otomotiv employees or customers are also regarded in the same way. Any kinds of behavior that damages company assets are also prohibited.

Doğuş Otomotiv employees cannot carry any kind of weapon or any parts of weaponry in the buildings or units of the Company. When you encounter a situation such as violent or a hostile attitude or behavior, or if you see a weapon is present in any unit of the company, you should immediately report to Doğuş Otomotiv Security Unit and your immediate supervisor. If you sense the danger is too imminent, please inform the authorities by calling 155 first, and then report to Doğuş Otomotiv Security Unit.

Domestic violence also often jeopardizes the safety of company employees in the work environment. When faced with such a situation, first inform the police and then our company security units for your own safety and the safety of your coworkers. Furthermore, if you think you need support on these issues, please contact the Human Resources Department.

SAMPLE CASE

A fellow worker I work with got a warning from our manager after getting involved in an incident with a customer. Displaying extremely angry behavior, he/she damaged the phone on his/her table the same day. In the evening shuttle we took to go home after our shift, he/she used bad language about the customer he/she had trouble with, and also about our manager. What should I do, concerning this matter?

ANSWER: If you think that the behavior in question is consistent and escalating and is an unchanging behavior, share the matter with your immediate supervisor and/or your manager next in line. Observe the functioning of the relevant warning mechanism. If your teammate's behavior continues in the same way, please warn your immediate supervisor/manager next in line again. If you think that no progress has been made, please submit the matter to the Ethics Line.

Workplace Safety and Environment

Doğuş Otomotiv is committed to providing a safe workplace for all its employees, and to fulfilling its environmental responsibilities.

You should perform your job safely and respectfully to the environment, as well as complying with Doğuş Otomotiv's related policies and practices and legislative regulations.

If you are suspicious about an incident endangering employee health and safety or inflicting environmental damage, report the situation to your immediate supervisor or Ethics Line without delay.

If you hold a managerial position, make sure that co-workers directly reporting to you have the required training about health, safety and environmental issues that might cause risks to themselves, comply with all laws and regulations, and act according to corporate policies and principles. Pay maximum attention to the concerns reported about health, safety and environmental issues. Share the matter with your immediate supervisor and/or manager next in line or Ethics Line without delay.

If you think your immediate supervisor did not take the requisite action about the matter, or a there is potential unconformity, report the situation to Ethics Line immediately.

Doğuş Otomotiv measures and monitors occupational health and safety performance of the Company. This includes occupational accidents in the workplace and those happen entailing the work processes. When you experience any occupational accidents, immediately reach out to your supervisor and proceed in line with the required corporate procedures. Your supervisor will assure the necessary actions to be taken by sharing the matter with Human Resources Department.

As per the legislative regulations, government agencies may conduct audits on employee health, safety and environmental issues periodically. In such cases inform your immediate supervisor and/or your manager in line without delay.

SAMPLE CASE

My manager at times calls me after the shift is over, while I am driving back home. Since I don't want to take the call when I'm on the wheel, I park my car at the next stop area on the highway and call my manager back. Although I explained him/her several times that I haven't been able to answer his/her call because I was driving, my manager urges me to pick up the call right away. What can I do about this matter?

ANSWER: If you can share your concerns about this issue directly with your immediate supervisor, perhaps you may resolve the incident with proper and healthy communication. If you think you are not able to solve this problem and the matter is ongoing, share it with the Human Resources Department. If you feel you are at a worrying point or are out of solutions, call the Ethics Line and report your issue. The safety of Doğuş Otomotiv employees is a priority for us.

SAMPLE CASE

I feel like I am at risk because of shuttle services being carelessly driven, speeded and emergency lanes being violated. Even though I gave the necessary feedback, there have been no improvements in the situation. What should I do?

ANSWER: Please report the situation to the Ethics Line.

Harmful Substances, Narcotics and Gambling

Doğuş Otomotiv is obligated for creating a safe work environment free from all harmful substances. You are strictly forbidden to carry, use, sell, deal or deliver illicit substances hazardous to human health such as illegal drugs, alcohol, narcotics during working hours, within the company buildings or during the use of company vehicles or equipment (except using drugs prescribed by your physician). You cannot work at the workplace when under the influence of drugs containing narcotic substances, which are banned or limited by laws. Your employment contract will be terminated, if such an indication is verified by a physician report.

If you are using a medication that may endanger your safety, you should report this to your immediate supervisor. You should not use any company-owned vehicles, tools or equipment if the medication you use slows down your decision-making ability or reduces your attention.

When you encounter a legal follow-up regarding the use of illegal drugs and similar illicit substances or substances hazardous to human health, you should report the situation to your immediate supervisor, without delay. For the Company to take the necessary precautions to protect its corporate reputation, and to monitor the legal proceedings for the continuum of your job, you are expected to inform your supervisor and Human Resources Department, at once.

It is strictly forbidden to gamble or play games of chance (including sports lottery or betting games) during your shift within the company, on company systems, or while performing your job, and it is in violation of Doğuş Otomotiv Code of Ethics. Our employees must not get into habit of gambling or playing games of chance even when on their personal times.

SAMPLE CASE

One of my teammates plays legal betting games during the working hours. Recently, I can say that he/she devotes all his/her attention to these games. Moreover, I know he/she lost a lot of money on these games lately. What should I do?

ANSWER: Principles concerning this issue are clearly specified in Doğuş Otomotiv Code of Ethics. If your direct warnings yield no results, you should share your concerns with your immediate supervisor and/or manager next in line or notify Ethics Line.

Alcohol

You may not consume alcohol during your regular working hours or while using a company-owned vehicle and equipment, or offer consuming alcohol to your co-workers. The only exceptions are having an alcoholic drink served by your executives or senior management for internal

celebration purposes, or alcohol consumed in appropriate limits during celebrations, dinners or events that you attend while representing the company outside. In such events where alcohol is served, consuming it is completely at your discretion. Even in company and business-related events, we expect you to use alcohol responsibly, not forgetting that you represent the company, and not behaving in a way that harms the reputation of the company. Of course, you can never drive a vehicle when under the influence of alcohol.

When you encounter a legal follow-up regarding the consumption of alcohol, you should report the situation to your immediate supervisor or to Human Resources Department without delay. For the Company to take the necessary precautions to protect its corporate reputation, and to monitor the legal proceedings for the continuum of your job, you are expected to inform your supervisor and Human Resources Department without wasting time.

SAMPLE CASE

During the breathalyzer test I had to take while I was driving my personal vehicle at the weekend, my driver's license was confiscated because my alcohol level was detected to be over the legally allowed limits. However, I couldn't dare telling our manager about this as we have to travel for our job frequently and on those trips, I am expected to drive a company vehicle. My license is confiscated for 6 months. I don't want to lose my job because of this incident. What should I do?

ANSWER: Principles concerning this issue are clearly specified in Doğuş Otomotiv Code of Ethics. If your job requires using a company vehicle and if not being able to drive prevents you to perform your duties, your work contract will be terminated as stipulated by relevant procedures and regulations. However, if your job does not require you to use car, you should share your situation with your immediate supervisor and/or manager next in line for your own safety and to avoid exhibiting any behavior against laws and regulations. If you need support about alcohol abuse in your social life or psychologically, you are welcome to contact the Human Resources Department. The safety of Doğuş Otomotiv employees is valuable for us.

SAMPLE CASE

One of my colleagues is opening bets in the department and collecting money from other colleagues prior to major soccer games. Does this violate workplace rules?

ANSWER: This certainly violates workplace rules and Doğuş Otomotiv Code of Ethics. You are required to notify Ethics Line about the situation.

Aids and Fundraising

If not implemented within the framework of company policies and practices, aids collecting and fundraising activities carried out without the knowledge of company executives generally reduce work efficiency and furthermore, may be challenging for your co-workers. The possibility of aids money and donations transferred to some illegal activities may also put our company in a difficult situation legally.

For this reason, collecting aids and donations, distributing their related announcements and participating in such activities are strictly prohibited

during working hours (including promoting or supporting them), disseminated in writing, verbally, via the internet, or using company tools and equipment (fax machine, computer, telephone, etc.), which are not related to your job. Aids and donations made to individuals, institutions and organizations that have been announced in accordance with Doğuş Otomotiv policies, approved by our company and legally inspected, campaigns and activities related to these, and volunteering programs are excluded from this and are not considered within the scope of this principle. Donation campaigns, volunteering programs and aid collecting activities supported by our company are announced regularly on the company intranet system. To get more detailed information on this subject or make a suggestion, you can take advantage of the Doğuş Otomotiv suggestion system or contact Corporate Communications Department.

All aid and donation campaigns conducted on behalf of Doğuş Otomotiv or by Doğuş Otomotiv itself, or organized and managed by Doğuş Otomotiv employees must be following the policies and principles of the company and approved by the Board of Directors of Doğuş Otomotiv.

SAMPLE CASE

I want to collect donations within the company for a family which I think is deeply in need of help. How should I proceed about this?

ANSWER: Our policies on aids collecting and donation strategies are clearly specified and duly announced to the public. Share your private cases with your supervisor, so that we can discuss whether it is possible to initiate a small aid campaign that can be approved by the company's senior management or evaluate your proposal within the scope of our existing volunteer programs.

Confidentiality of Employee Information

Doğuş Otomotiv may use personal and digital information of its employees to the extent permitted by legislative regulations, and within the framework of studies conducted to improve company operations, regulation activities and other studies to benefit personnel. Protect personal information of employees (TR ID Numbers, Internet and PC passwords, financial information, home addresses and phone numbers, personal mobile numbers, etc.) which you have access to because of the department you are working in and the operations that you are involved in.

Except when required for legal processes, your duties in the company, and situations in which you have the consent of the person, do not share personal information of your colleagues contained in the records of the company or with people within or outside the company, under any circumstances and/or conditions. Sharing employee information with third parties without valid and legal reasons is deemed as an act against company policies, the Doğuş Otomotiv Code of Ethics and, in certain cases, legislative regulations.

SAMPLE CASE

A friend of mine works for a human resources company. He/she asked me to give the e-mail addresses of our company employees for a survey they organize each year. What should I do?

ANSWER: The confidentiality of Doğuş Otomotiv employee information is under the company's responsibility. Share the issue with Human Resources Department, and ask their support.

Surveillance at Work

To the extent allowed by law, Doğuş Otomotiv has the right to monitor the use of communication tools, computers and internet use of its employees to protect company assets, ensure impeccable client service, create a safe working environment for all employees and prevent impropriety. Again, in compliance with relevant laws and regulations, Doğuş Otomotiv may analyze, investigate and request legal investigation, with or without notice, and only for reasons in benefit of Doğuş Otomotiv, any and all company assets, employee communication tools, transportation vehicles and systems provided by the Company, as well as other company equipment, whenever deemed necessary.

SAMPLE CASE

I noticed that my PC was accessed remotely, and my files were inspected without my knowledge. This made me uncomfortable. What should I do?

ANSWER: Our policies and practices regarding your concerns are clearly stated in the Doğuş Otomotiv Code of Ethics. To find out if your company PC was subjected to an external hacking, contact the IT department to confirm that you are not under the threat of third parties intending to access Company information.

The Use of Recording Devices

The use of recording devices, without the consent of the parties concerned, is considered against the law by many public or private establishments. Except for cases approved by the Board of Directors of Doğuş Otomotiv, taking photographs, recording videos or voices of other employees, or systems, documents or other tools used by different employees are not allowed without their knowledge and consent. Similarly, you cannot record images or voices of any of our customers, suppliers or business partners, without their knowledge and consent.

SAMPLE CASE

We sometimes take group photos with my teammates at work. When doing so, am I violating the Code of Ethics?

ANSWER: Images recorded with the knowledge of your work mates, that would not damage the company reputation and done privately in good faith are not in conflict with the Code of Ethics.

Non-Ethical Behavior outside the Workplace

Doğuş Otomotiv employees, even when off of work, should not engage in activities which would adversely affect the motivation at work, or harm the established reputation of our Company and its business relations. If such a situation occurs, you are expected to notify your immediate supervisor and/or manager next in line or Ethics Line, without delay. If you encounter a conduct committed by a Doğuş Otomotiv employee that would constitute a felony according to the laws of the Turkish Republic or suspect such a conduct is about to be committed, you should bring the matter to the attention of your immediate supervisor and/or your manager next in line or contact Ethics Line, without delay.

SAMPLE CASE

I suspect that one of my co-workers is involved in a situation I know to be a crime. I am not sure, but yet quite nervous. What should I do?

ANSWER: Please share your suspicion including your reasons with your immediate supervisor and/or manager next in line, without delay. If you believe your supervisor has failed to take necessary actions, assessing the significance and the severity of the issue first, you should share your concerns with Human Resources and Legal Departments, or contact Ethics Line, at once.

SECTION 2

HONESTY AND FAIRNESS IN THE WORK ENVIRONMENT

Doğuş Otomotiv's corporate reputation largely depends on the behavior and honesty of its employees. While performing your job, it is particularly important to avoid a relationship or activity that could affect, or even have the possibility to affect, your impartiality and making fair decisions. When legitimate interests of Doğuş Otomotiv are concerned, protecting these interests fully to the favor of our Company is your duty. Using the assets and corporate information of Doğuş Otomotiv for your own benefits is strictly forbidden.

Preventing Conflicts of Interest

You are expected to comply with principles as indicated in the Doğuş Otomotiv Code of Ethics to prevent existing or potential conflicts of interest. This section addresses Doğuş Otomotiv's policies and sample cases relating to "conflicts of interest", frequently encountered in all sectors.

Personal Conflicts of Interest

Being a manager of a person working within the company, who is a family member, and anyone with whom you have a personal (private) relationship, emotional ties and/or a close relationship of any kind or undertaking the supervision of such persons in a project, is against Doğuş Otomotiv Code of Ethics. In addition, it is also not allowed for you to take part in the decision-making process of a company, with which Doğuş Otomotiv has a business relation (business partnership, supplier relation, etc.) with the company where such persons are employed. In the event that you find yourself in a situation as mentioned above, you are expected to bring the situation to the

attention of your immediate supervisor and/or manager next in line or the Human Resources Department without delay. You are prohibited to use your position and privileges within the company for personal benefits, or for the benefits of your acquaintances and relatives.

SAMPLE CASE

I am a District Manager at Doğuş Otomotiv. My mother-in-law wants to sell her vehicle. She has asked me to handle the sales process, collect the money from the sale of the vehicle in cash, and to deliver it to her in person. I would like to handle this sales transaction through an authorized dealer that reports directly to me. Do I have to make any kind of notifications regarding this situation?

ANSWER: Your relative has asked you to use your authority to handle a transaction that she wouldn't be able to actualize herself under normal circumstances. This situation is in violation of Doğuş Otomotiv Code of Ethics. You need to advise your relative that you are unable to actualize the process and decline the request. When you encounter such a request from your relatives/acquaintances, you need to divert them to authorized service centers that are not under your direct management, and allow the normal sales process to assume.

SAMPLE CASE

I had an emotional relationship with one of my co-workers. However, he/she was recently promoted and became a manager in my department. Do I need to notify my Company about this issue?

ANSWER: Yes. This situation may lead to conflicts of interest in your department. All Doğuş Otomotiv employees have equal rights within the company. You have to prevent misunderstandings by reporting the situation to the manager in charge of your department.

Working outside the Company

It is strictly prohibited for you to work for, be a consultant at, or take part in a project in (paid or unpaid) any institution or organization that is a supplier, authorized dealer or service center, subcontractor, business partner or competitor of our Company, without knowledge and consent from Doğuş Otomotiv.

Similarly, you are also prohibited from working (with or without pay) outside the company, or having a commercial relation, without written consent from the Human Resources Department and your supervisor.

SAMPLE CASE

I would like to take on an extra job to earn more money. Would this pose a problem for my company?

ANSWER: This situation is addressed in an article in the employment contract signed prior to employment, and in violation of the Doğuş Otomotiv Code of Ethics.

SAMPLE CASE

I have a partnership in our family enterprise operating in the textile business since its establishment. I have no direct relations with the operations or management of the company. Do I need to make any notification about this partnership?

ANSWER: You need to notify your supervisor and the Human Resources Department about your partnership you have in the family business.

SAMPLE CASE

Our family enterprise is planning to purchase a large quantity of vehicles distributed by Doğuş Otomotiv. Am I expected to report this purchase? How can I advise my family business on the matter?

ANSWER: Remember that procedures applicable to all our customers also apply to your relatives. Make sure that they get in touch with the relevant sales units in order general practices to be applied. Do not under any circumstance become involved in the sales transaction.

SAMPLE CASE

After my husband/wife quit his/her job, we opened a clothing store of which I am a partner as well. From time to time, I lend money to the company to help its finances and also offer support in some important decision-making processes. Do I need to make any notification about this?

ANSWER: It is not possible for you to work for another company while working for Doğuş Otomotiv; this is in violation of the employment contract.

SAMPLE CASE

I have a small kiosk. I don't actually work there but I monitor its operations. Do I need to notify my company about this issue?

ANSWER: Working for another company while employed at Doğuş Otomotiv is not allowed and considered as a violation of the employment contract.

Other Activities Outside the Company

Many of our employees happen to take part in the management or work groups of alumni associations of the schools they graduated from, or various cooperatives or non-governmental organizations. A conflict of interest may arise if our employees, who are members of such institutions and organizations, hold decision-making positions involving Doğuř Otomotiv products and services. If you are employee at Doğuř Otomotiv and hold such a position, you should make sure not become part of a mechanism that has decision making power for the products offered and services rendered by Doğuř Otomotiv or its competitors. In such a case, notify the organization you are a member of that your position there may cause conflicts of interest for Doğuř Otomotiv, without providing any further information concerning our company. Also please remember to get consent from your supervisor if your duties at this organization require to be performed during working hours, and/or if you need to use Doğuř Otomotiv resources.

Please note that if you take part in a position representing Doğuř Otomotiv in the management or committees of institutions and organizations outside the Company, the approval and decision of Doğuř Otomotiv Board of Directors must be obtained.

SAMPLE CASE

I am member of a nature and environmental preservation organization. During an event held this weekend event, we had a brush with the police forces. As a result, those participated in this event, including myself were taken into custody and later released. Am I supposed to do any notification regarding this incident?

ANSWER: Report the incident to your supervisor and the Human Resources Department.

SAMPLE CASE

The company I work for is not under contract with any union. However, I am a member of a union. Do I need to inform about this?

ANSWER: Our company respects our employees' right to join a union. Please inform your manager and the Human Resources Department of your membership and, if any, the function you have in the union.

Political Conflicts of Interest

All Doğuř Otomotiv Executives and Employees are expected to fully comply with the laws and regulations in their relations, including those of financial, governmental ethics and lobbying, established with authorities of official organizations. In addition, meetings and activities with official organizations can be only conducted on behalf of the Company after receiving approval from the senior management of the company.

Personal Political Activities

Your political alliances and activities must be kept entirely separate from your work and duties at the company. If you take part in these types of activities, using Doğuř Otomotiv's name, your work within the company or company assets for this purpose are in violation of the Code of Ethics.

If you are in a position which requires you to stand before the authorities of, or need to be in relation with an official organization, where Doğuř Otomotiv has business, or which is within the scope of our Company because of industrial interests, you should clearly state that you are not representing Doğuř Otomotiv and inform your supervisor about the issue.

SAMPLE CASE

I am a member of a political party and I am actively involved in its work. Should I inform my company about this engagement, although I carry out outside working hours?

ANSWER: Inform your supervisor and the Human Resources Department about your activities and duties.

Use of Company Assets for Political Support

You cannot provide any corporate support or assistance in cash or in kind to any political party, political party candidate, political campaign or official public institution representatives, in a manner that does not comply with the legislative regulations and without the approval of Doğu Otomotiv Senior Management and Legal Department. In addition, you cannot pressure any of your colleagues in the company to participate in political mechanisms or to support such structures.

Relations with Public Institutions

You cannot take office (committee membership, public schools, various volunteer positions in aid centers, etc.) in any of public institutions and organizations, including local governments, without the knowledge and approval of the Company and your manager.

SAMPLE CASE

I volunteer for the local administration committee in my neighborhood. I use my work PC since I do not have a personal one. Is this inappropriate?

ANSWER: All devices, tools and equipment belonging to the company are provided to you only for work related use. Using them for any other purpose is against the Code of Ethics.

Insider Trading and Financial Activities

Insider Trading means to gain unfair benefits or eliminate a loss in a way that disrupts the equality of opportunity among those trading in the capital market, by using information that has not yet been disclosed to the public to benefit themselves or third parties, which may affect the value of capital market instruments.

Company shares to be traded by company employees is an allowed activity, appropriate with the Code of Ethics however these activities may not be performed in the following periods: a – starting the last day of the reporting period of financial tables until these tables are made public according to the related regulations, and b – periods specified and announced by the senior management of the company according to the relevant regulations. Purchase and sale of company shares by using internal information (not disclosed to public and yet significant enough to affect trading decisions) is an illegal pursuit called “Insider Trading”. Providing such information to any persons outside the company is also considered as illegal, within the same scope.

Insider trading is against the law, and is an illegal crime that includes serious penal sanctions, including imprisonment. As a Doğu Otomotiv employee, it is possible to be in the possession of important internal information about both our company and other institutions and organizations that our company does business with.

You should never be involved in buying or selling shares by using the internal information you possess of Doğuş Otomotiv or any other company. This requirement covers all commercial activities, including secondary stock and bond market transactions, such as double-profit operations and short-term transactions or other futures. In addition, it is strictly forbidden to share the internal information of the company with your family members or friends or with third parties who may use insider information to buy and sell shares or perform similar commercial activities. Likewise, Doğuş Otomotiv Board of Directors members' engaging in such activities is considered being against the Code of Ethics and is strictly prohibited.

Legislation, laws and regulations regarding share purchase and sale transactions made through the use of internal information can be quite complex. Therefore, if you think that you have encountered such a situation; before buying and selling Doğuş Otomotiv shares, immediately contact Doğuş Otomotiv Investor Relations for detailed information. As a general rule, our company's business operations, its financial outlook, legal and regulatory cases or administrative issues should be considered de facto as "internal business information" unless disclosed to the public.

SAMPLE CASE

I work in a department that has access to the company's financial information and my name is on the insider list. I suspect that one of my colleagues with whom I work in the same department is trading with Doğuş Otomotiv shares in the stock market. What should I do in this case?

ANSWER: Said situation is in violation of the Code of Ethics. You should immediately inform your unit supervisor.

Investing in Companies that Have Immediate Relations with Doğuş Otomotiv

If you are conducting joint operations or managing such operations with any company on behalf of Doğuş Otomotiv, you are prohibited from engaging in commercial activities related to the shares trading of that company. If prior to working for Doğuş Otomotiv you were involved in those types of operations, or currently hold their stocks, and are assigned to a position in direct contact with such companies, you are obligated to notify the issue to company senior executives or Investor Relations Department immediately.

SAMPLE CASE

I started working at this company before its IPO and along with other employees I purchased shares at that time. These shares have been in my possession for a long time now, and I am thinking about selling them. According to information not disclosed to the public, the company is performing financially quite well, and the value of the shares is expected to rise. Is it in violation of the Code of Ethics to sell my shares before the financial reports are made public?

ANSWER: Insider trading is against legislative regulations. For this reason, you are to wait for company information to be disclosed to the public prior to engaging in any commercial activities with the shares you hold. You should inform the Investor Relations regarding the issue.

Financial Relations with Specific Companies

It is against Doğuş Otomotiv Code of Ethics to take actions in connection with “insider trading” regarding companies that serve in the same sector with Doğuş Otomotiv, are competitors or that provide services to one of these companies. These commercial activities are defined as owning 1/10 or more of equity shares of listed stock or other financial instruments of these companies, and instances where the total value of the business activity realized in a year is more than 25% of your income paid to you by Doğuş Otomotiv (including wages and bonuses).

Investment Operations

As long as you do not violate the insider trading rules, you are free to make financial transactions that make it possible for you to benefit from the value loss and / or gain of Doğuş Otomotiv’s shares, bonds or other financial values. However, you cannot buy or sell company shares in the following periods:
a-starting the last day of the reporting period of financial tables until these tables are made public according to the related regulations, and b-periods specified and announced by the senior management of the company according to the relevant regulations.

Credits and Loans

Doğuş Otomotiv senior executives are forbidden from taking personal loans from the company as stated under the Turkish Republic New Commercial Law No: 6762. Lending money exceeding TL 100 among managers and employees in direct reporting relationships is in violation of the Code of Ethics. Furthermore, employees should not take loans above their purchasing power, and pay attention that their expenditures are proportional to their income.

SAMPLE CASE

My manager, whom I report directly, asked me to lend him/her 500 TL for an urgent need, and told me that he/she would pay me back when his/her salary is deposited next month. Would it be wrong to lend this money?

ANSWER: Yes. As stated in the Code of Ethics, personal borrowings of more than 100 TL between you and the manager with whom you directly report are prohibited.

SAMPLE CASE

My colleague asked me to co-sign a consumer loan that he/she was about to apply for. I am thinking of accepting to be a co-signee because I trust this person. Should I share this situation with my company?

ANSWER: It is against the Code of Ethics to be in commercial relations with persons you directly report to. If you are not in the same unit as your colleague and if you are not reporting directly to him/her, consider the matter personally.

SAMPLE CASE

I have been thinking of buying an LCD TV. My manager offered to sell his/her new television set for less than its value, saying that he/she needed the money. Would it be okay for me to accept this attractive offer?

ANSWER: It is against the Code of Ethics to be in trade relations with persons you directly report to, even if it is for one time only. You should inform your manager next in line about the matter.

Obligatory Notifications of Employees

Related or unrelated to their duties in Doğuş Otomotiv, employees are expected to report any actions initiated by public prosecutors or any legal case brought against them other than divorce, inheritance disputes or custody, to their supervisors and Human Resources department.

SECTION 3

PROTECTING THE ASSETS AND REPUTATION OF DOĞUŞ OTOMOTIV

Accurate and Valid Information

Doğuş Otomotiv is committed to informing the public and relevant legal authorities in a timely manner, by sharing accurate and valid information regarding the Company, in line with all legal arrangements including voluntary international codes.

Accurate and Valid Data and Records

Valid reporting on work being conducted and activities being realized (including details such as reporting periods, missing information in the reports, efficiency, citations and quality control), that reflect the reality fully and accurately, are among our most vital expectations from you.

Any information you record, you should go through it with a fine comb and make necessary corrections to avoid inconsistencies. When you notice that your records contain incorrect or incomplete information or when you are warned about such inaccuracies, , immediately inform your manager about the issue. Moreover, inform customers

or suppliers when necessary and when the matter directly relates to them since the smallest mistake may put the validity of your records into question. For this reason, you are expected to inform your immediate supervisor and/or manager next in line of the mistake without delay, regardless of its magnitude or when it occurred.

“ Doğuş Otomotiv does not tolerate any errors or falsifications in its records and documents. ”

Transparent and Full Disclosure

Doğuş Otomotiv is committed to transparency in financial reporting to ensure that investors better understand the operations of the company and can base their investment decision on accurate information. All public financial reports and public information of the company are controlled by Doğuş Otomotiv Investor Relations Department. Entire Company information is disclosed to the public in a complete, fair, valid, understandable and timely manner.

Do not discuss securities, operations, business plans, financial standing, financial results or any other information regarding any development or plan of Doğuş Otomotiv that has not been disclosed to the public, but you are aware of, in your private relations, face-to-face interactions, or in small groups you participate or meetings, including those with your colleagues.

When making a presentation or offering a proposal to customers, suppliers, investors or any other third party, pay attention to not to divulge this type of information.

Doğuş Otomotiv collaborates with various audit experts both internally and externally to ensure valid reporting. When necessary, be sure to provide full and accurate information in all audits carried out with knowledge and approval of the Company. Do not try to persuade, direct or otherwise interfere with the concrete data during such audits.

During any audits or similar inspections, if the requested cooperation is not provided on time or furnished inaccurately, sanctions that may even lead to the termination of the employment contract shall be enforced.

Safety of Company Records

Company records should be kept in accordance with legislative regulations and Doğu Otomotiv policies and principles, and their safety should be ensured.

You cannot destroy, alter, falsify, change, or erase any Company records that you are responsible for.

If you suspect that company records have been modified or tampered, report the situation to your immediate supervisor and/or your manager next in line or Ethics Line, without delay. If you find yourself in a situation where you are requested to make these types of modifications by any entity inside or outside the Company, advise the Internal Audit Department, and protect the records to the best of your ability.

Protecting Company Records

You are responsible for protecting all information considered “insider information” (any information that may lead an individual or an institution to buy, sell or retain shares of Doğu Otomotiv or any other company) not disclosed to the public, all information of Doğu Otomotiv (personal phone numbers, marketing presentations, customer information etc.) not disclosed to the public, and any other information that may violate the intellectual property rights (copyrighted works, pictures, logos, advertising images, etc.) of Doğu Otomotiv or any other third party whether or not disclosed to the public.

SAMPLE CASE

Is it necessary to have my work PC password protected?

ANSWER: Yes. Your PC must be password protected with a password known only to you.

SAMPLE CASE

I am required to travel for work both domestically and internationally. I share my PC and systems password with colleagues from my department so that they can follow up certain activities during my absence. Is this against the Code of Ethics?

ANSWER: The password that you use to log into company systems is personal and should not be shared with others. Said situation is in violation of Code of Ethics.

Protecting Company Information Not Disclosed to the Public

You are required to act in accordance with the policies and principles of our Company and the relevant laws and regulations of the Prime Ministry’s Capital Markets Board of the Republic of Turkey in terms of using, changing, protecting and disclosing information that is accepted as “insider information” not disclosed to the public. In cases where the signature and approval of the Chairperson of the Board of Directors are present, the Members of the Board of Directors are authorized to disclose appropriate information to the public.

You cannot share any nondisclosed financial information with persons and establishments outside the company. Sharing any information not publicly disclosed, without the consent and knowledge of Investors Relations Department and the Members of the Board of Directors who are responsible for financial results of Doğuř Otomotiv and disclosing any other relevant information, through forums on the internet, chat rooms or blogs is strictly prohibited. Financial information that you are responsible for can only be disclosed to those authorized persons who are working in Doğuř Otomotiv and require access to the information for their work.

If you receive a subpoena or a summons from public institutions requesting disclosure of non-public information of the company, immediately share the matter with the Investor Relations Department. Even if Doğuř Otomotiv has shared this information within the company, remember that this information may still not be publicly disclosed and therefore may need to be protected. Your obligation to protect non-disclosed information about the company continues even after your contract with Doğuř Otomotiv expires, and you leave the company. When you are in doubt about the safety of the company's non-public information, please share the matter with the Investor Relations Department, without delay.

SAMPLE CASE

When I take this bus to commute back and forth to work, I sometimes find myself having to discuss matters including company information. What should I do?

ANSWER: Do not discuss Company's undisclosed information in public areas, when traveling by taxi, train, on elevators or attending conferences, at social event venues. Be absolutely careful when you need to make a phone call in a public place.

Protecting Information of Other Establishments Not Disclosed to the Public

Do not let persons who are not authorized to disclose any information that can be considered "insider information", convey non-public information to you even if they are the official employees of that establishment. When such an institution has a permission written for and signed on behalf of Doğuř Otomotiv, or when a contract containing the conditions for the disclosure of the information to Doğuř Otomotiv employees is signed bilaterally, such information can be used for only business purposes, provided that it is within the knowledge and consent of establishment in mention.

SAMPLE CASE

I saw one of our competitors' pricing information by chance in a blog published on the internet. It was marked "confidential". While preparing my offers for my customers, is using this information in violation of the Code of Ethics?

ANSWER: Since you do not know whether the person who disclosed this information to the public has the authority to do so, please contact your supervisor and get opinions before making use of the information.

Proper Use of Company Assets

You should always protect all tangible or intangible assets belonging to Doğuř Otomotiv and entrusted to your responsibility by your customers or our business partners.

Unless a special permit is granted, the assets of the company, as well as the assets of business partners, and individual or corporate customers, cannot be bought, sold, leased, lent or disposed of, regardless of their status or value. "Assets" include, but are not limited to, tangible assets, data, records and all sorts of contact information.

Unless otherwise stated in the written policies of the Company, personal use of machines, equipment or tools, electronic devices or special discounts or free vehicles belonging to Doğuř Otomotiv is absolutely inappropriate.

SAMPLE CASE

I am a manager in the sales department. One of my close friends wants to buy a car and ask for a special discount. What should I do about it?

ANSWER: Corporate systems of Doğuř Otomotiv cannot be used for any personal purpose. Your friend is one of our valuable potential customers as well, among others. Inform him/her about the current discount rates that can be offered. Moreover, notify your immediate supervisor and/or manager next in line about the issue.

SAMPLE CASE

I returned home with one of the vehicles in the Company's common use pool due to business reasons on Friday. Can I use this car for my private needs on Sunday?

ANSWER: If there is not an unusual situation, and the car is not allocated to you, using any and all assets of the company for personal purposes is in violation of the Code of Ethics.

SAMPLE CASE

I work as a sales representative. I noticed that one of my colleagues transferred overpayments from the current accounts of many customers to the account of his/her spouse. When I warned him/her, he/she suggested sharing it with me, and said that nobody would realize it since it is overpayment. I told him/her that I do not want any share and neither he/she should do it, but he/she ignored my warning. What should I do?

ANSWER: Regardless of their status or value, assets belonging to Doğuř Otomotiv, as well as its customers and business partners, cannot be bought, sold, leased, lent or disposed of. This situation means that your colleague is abusing his/her duty and responsibility and it is against the Code of Ethics. Share the situation with your immediate supervisor without delay or report to the Ethics Line.

Employee Benefits

The benefits that Doğuř Otomotiv provides to employees, and the programs implementing them, must be taken advantage in an honest and fair manner. Please provide correct information about yourself, including your health status, and your dependents during your job application or when employee information are renewed. In addition, when you are absent from work, please inform your immediate supervisor stating accurately where you are and why you are not present in the company. Accurate statements are particularly important for the fair distribution of the benefits provided to our employees, and for you and for your colleagues to fully take advantage of them.

SAMPLE CASE

My supervisor is requesting me to help in taking care of his/her personal affairs during working hours. For example, I am asked to deal with things such as shopping for his/her spouse, dropping his/her daughter to school, taking care of his/her banking business, selling his/her summer house. This causes my main duties to be disrupted. What should I do?

ANSWER: The time you spend during working hours is one of the company's assets. Improper use of company assets is in violation of the Code of Ethics. Report the issue to your manager next in line or Ethics Line.

Proper Use of Company Property and Assets

All company assets with a financial value and monetary resources should be used in a responsible and honest manner in line with the policies and principles of the Company. Using company assets for personal purposes and without the knowledge of the Company is strictly prohibited.

Working Hours

Please take good care to keep valid, consistent and accurate records of your working hours.

Do not urge other employees to incorrectly report or under-report your working hours. By keeping your working hours regularly, as expected from you, you confirm that you are at your job on time, and you do not have any unrecorded working hours. You may share your concerns or questions about this issue with the Human Resources Department and request your salary payments scheme to be explained.

Use of Communication and Information Systems of the Company

All information and communication systems of Doğuş Otomotiv, including the computers and mobile devices provided to you to perform your duties in the company, are valuable company assets that must be protected by all our employees.

Prevent data and company information to be leaked to the public accidentally or without the consent of the company, or such information to be used for malicious purposes, modified improperly or to be destructed. You can use company-provided devices for personal purposes at a reasonable level, as long as it does not affect your role, responsibilities and company's operations, does not incur unacceptable costs, and is not against laws, regulations or Doğuş Otomotiv policies.

It is your responsibility to ensure your user ID and password that you use to log into company computers, electronic networks or mobile devices are safeguarded. Please check all electronic devices and materials, for example, computer programs, CDs and DVDs, files, files and data downloaded from public networks via the internet, or any electronic information received from third parties, before you use them, to protect from viruses and other harmful programs. Only licensed programs approved by the Company Communication Technologies Department can be used on company computer systems. When working with company data, logging into company systems, making changes on or deleting information, or when making a comment about Company information on any public platforms on the internet, always keep in mind the relevant policies and principles of the Company.

SAMPLE CASE

I generally transfer my work that I carried out at home through a portable USB to my company PC. However, I do not know whether it is safe or not. I am concerned that I might be damaging my company PC. What should I do about it?

ANSWER: When memory sticks or disks are connected via USB plugged in company PCs, the preinstalled antivirus program scans them for common viruses. At such time, likely virus activity is arrested by the antivirus program. Antivirus software receives the latest virus database information and updates itself automatically.

SAMPLE CASE

I would like to download a program to get weather forecast on my company phone. Is there a drawback?

ANSWER: Considering the explanations above, reasonable and limited personal use of company-provided electronic devices is not in violation of the Code of Ethics.

SAMPLE CASE

One of my friends sent an invitation to an e-mail chain which will support a charitable project if I send it to 10 more people. Is joining this e-mail chain an improper behavior?

ANSWER: Yes. Distributing and sending chain e-mails through company systems is strictly prohibited.

SAMPLE CASE

An intern assigned to the department is taking print-outs from the company printer to complete his/her thesis. I didn't regard this as an issue since it did not disrupt his/her work. Is it a violation of the Code of Ethics?

ANSWER: Using company PCs and other equipment for personal projects is in violation of the Code of Ethics. Inform your supervisor about the issue.

Prohibited Actions

You cannot use company systems (e-mail, instant messaging, Intranet or internet) for purposes that are illegal, in violation of company policies or may result in damaging the trust and brand reputation of Doğu Otomotiv. Examples of some relevant actions are given below:

- Content containing pornography, profanity, or insult, or discriminatory or offensive,
- Chain-mails or mass e-mails sent for pyramid scheme purposes, or without company approval,
- Postings intended to get in touch with a person or organization on behalf of commercial enterprises,
- Communication applications targeting a group or unit directly among Company employees on behalf of an external institution or organization,

- Saving large personal files containing graphic or audio material or downloading them over the internet,
- Use of materials whose copyrights are held by other persons and establishments,
- Use of malicious computer programs or any electronic material that could endanger the security of the company.

Apart from the examples above, you are prohibited from sending non-public Company information to your personal e-mail or to any messaging service with common users, without the knowledge of your supervisor.

Safety of Company Buildings and Operations

Doğuş Otomotiv's services and operations must be carried out in total security, to protect our customers and others. Personal information of our customers, employees, systems and facilities related to electronic networks, computer systems and passwords, security procedures, company facilities and business areas in which the company operates, technical and market research data, information about developing products and services, business plans and strategies are the assets that must be securely protected.

You should take necessary measures to protect the ecological environment of Doğuş Otomotiv's supply chain as well. In addition, immediately report any incident that you think would constitute a crime, and the people you suspect to be involved, to the Security Unit.

Intellectual Rights

In accordance with the existing laws on the protection of intellectual rights, the use of Doğuş Otomotiv's brands, logo or similar materials whose copyright belongs to Doğuş Otomotiv is considered within this scope. To prevent illegal duplication and the misuse of intellectual rights of Doğuş Otomotiv, make sure that copyright sign (©) is placed in application areas. If needed, you can share the measures taken on these issues, things to be done and questions if you have any, with the Legal Department, following company procedures and practices when doing so.

Proper Use of Intellectual Rights of Others

We give particular attention to acting in accordance with laws and regulations about the protection of intellectual rights of all persons and organizations, including all our individual and corporate customers and our competitors.

Information Security of Your Former Employers

Any company you have been employed previously may have had you sign contracts or agreements that may affect your performance in Doğuş Otomotiv. If you did not report such incidences during your recruitment process, please inform your supervisor urgently.

Use of External Communication Mechanisms and Social Media

Indicating that you are speaking on behalf of Doğuş Otomotiv when expressing your opinion in public places, during professional or cultural events or in platforms on the internet (social media, Facebook, twitter, blogger, etc.), without the approval of the company, is in violation of Doğuş Otomotiv Code of Ethics.

The use of brands and logos belonging to the company must be within the technical standards set by the company. You can share your concerns and questions on the subject with Sales and Marketing and Corporate Communications Department.

Doğuş Otomotiv generally refuses requests beyond its impact which require corporate sponsorship or being a reference. For the works carried out by corporate customers or business partners where Doğuş Otomotiv's brands or its employees are used, approval of the Corporate Communications Department is required.

Areas of responsibility on this subject are as follow:

- Corporate Communications Department is responsible for public relations and media communications.
- Investors Relations and Corporate Communications Departments are responsible for sharing the financial performance of Doğuş Otomotiv with relevant institutions and organizations.
- Legal Department evaluates regulations in terms of operations and procedures of the company, and expresses opinions when necessary.
- Human Resources Department is responsible for issues related to employment, employees and communication with potential employees.

SAMPLE CASE

I saw incorrect news about our company in a blog on the internet. I want to respond to it by writing a comment. Would this be in violation of the Code of Ethics?

ANSWER: Yes. Corporate Communications Department is responsible for all communication activities on behalf of our company. Please share the matter with Corporate Communications Department.

SAMPLE CASE

During a conference, a reporter from a monthly magazine wanted to get my opinion on market expectations. What should I do?

ANSWER: Persons who can express an opinion on behalf of our company (Company Spokespersons) and the scope of their authorities on this regard are clearly stated in our company's annual report. Please share the matter with Human Resources and Corporate Communication Departments.

SECTION 4

HONESTY AND FAIRNESS IN THE MARKETPLACE

The key aspects of Doğuş Otomotiv's brand reputation are its perception as an honest company in the markets it serves, its trustworthiness and superior service quality.

Customer Relations

Doğuş Otomotiv's customers expect and deserve fair, honest and respectful service. As Doğuş Otomotiv employees and key stakeholders, it is your responsibility to provide this service.

Security of Customer Information

Doğuş Otomotiv's policies about customer information security include which kinds of customer information are kept by our Company and for what purposes this information is used for. Our customers may limit the usage areas of this information if they wish to do so; you are expected to respect their sensitivities in this regard. For any questions you have on our customer information security systems or to convey your concerns about this issue, you can contact Internal Audit and/or the Communications Technology Departments.

Suppliers and third parties doing business with Doğuş Otomotiv are also expected to pay utmost attention to the protection of information belonging to Doğuş Otomotiv customers. In case your work requires sharing any customer information with any third party, notify the Legal Department and seek their advice. If you have a concern that customer information has been accessed, used or destroyed by persons outside the company without the knowledge and consent of Doğuş Otomotiv, notify your immediate supervisor and/or manager next in line or contact Ethics Line.

Fair Marketing, Fair Sales

Doğuş Otomotiv policies require our customers to be informed in a full, clear, understandable and accurate manner by us about the services we provide and the products we sell. Providing false and/or incomplete information about products and services to customers, misleading or deceiving them or engaging in similar acts are major disciplinary offenses that may lead to the termination of your employment contract. The following are the fundamental components of Doğuş Otomotiv's honest and responsible marketing and sales principles and must be adhered to under all conditions:

- All advertising and sales materials should include realistic and valid information.
- None of the promotional materials distributed, published or delivered directly to customers may contain false, incomplete or misleading statements.
- All customer complaints should be seriously taken into consideration, assessed realistically and recorded.
- No advertising or sales material should be published and distributed without the approval of the appropriate units and managers.

When specifying prices to be used in advertising or promotional campaigns about products sold and services rendered by Doğuş Otomotiv, our customers should be ensured that the pricing on these materials printed for advertising and promotional purposes is clear, precise and correct. For this reason, information on such materials as well as explanations on additional fees, taxes etc. must be placed in a legible, understandable and visible manner.

No statements or pricing information that are misleading or betraying the trust of our customers can be placed on advertising and promotional materials.

Doğuş Otomotiv does not condone any behavior that is unfair, anticompetitive in nature and/or discredits its competitors. Therefore, when you need to make comparisons with a competitor's products and/or services during a sales and marketing activity, you are expected to be clear and honest. Doğuş Otomotiv delivers its products and services to the customers applying fair sales and marketing methods; avoid making false, incomplete and/or misleading comments about the products and services of our competitors.

Doğuş Otomotiv's Responsible Marketing Principles on sales and marketing processes must never be compromised. You must comply with these principles and rules in all circumstances. For example, you can only use the term "free of charge" while describing a service that is provided with no costs at all. Such terms containing definitive expressions may be misleading at times.

SAMPLE CASE

I witnessed one of my colleagues intentionally offering a more expensive service to a customer even though he could have offered a more economical solution, to meet our annual turnover target. I warned him, but he/she said that he/she was doing it to meet the annual turnover target and the customer did not object either. I don't know what I should do.

ANSWER: For Doğuş Otomotiv, compliance with principles of honest marketing and sales comes before any financial goals. Engaging in acts that are misleading and deceiving our customers are major disciplinary offenses which may lead to termination of employment contract. Inform your supervisor about the situation immediately.

SAMPLE CASE

During the repair of a vehicle brought to our service center, I unintentionally damaged one of the other parts of the vehicle by mistake. Without sharing the incident with my supervisor, I changed the part I damaged and did not report it. In the past, I saw that some of my colleagues intentionally damaged different parts of vehicles and created additional charge for customers. Therefore, I did not think that what I did was wrong at the time. However, I am now worried that it will be found out during stocktaking controls. What should I do regarding this?

ANSWER: For Doğuş Otomotiv, compliance with principles of honest marketing and sales comes before any financial goals. Engaging in acts that are misleading and deceiving our customers are major disciplinary offenses which may lead to termination of employment contract. Inform your supervisor about the situation immediately.

Relations with Government Institutions

Doğuş Otomotiv is committed to complying with the principle of doing fair and transparent business in its relations with all its stakeholders. As with other stakeholders, Doğuş Otomotiv's executives, employees and business partners are strictly forbidden to make payments, give gifts, offer payments or gifts or make similar commitments in their relations with government institutions to gain any benefit contrary to laws and regulations, and to influence the decisions of individuals or organizations. Likewise, making any types of payments, giving gifts or making commitments with a similar intend to a political party, a member of political party or their affiliated institutions and organizations is in violation of Doğuş Otomotiv Code of Ethics.

When establishing a relation with any government institution as a customer, you are required to consult the Legal Department, following company procedures and practices when doing so, since there may be some changes in laws and regulations, or some important procedures that you need to monitor and be careful about. Moreover, you are expected to pay special attention to and comply with the relevant laws and regulations in the purchasing processes of government institutions, especially with regards to receiving and giving gifts, providing support for special events, engaging in sponsorships activities, invoicing and maintaining the transparency of relations with the officials of the government institutions.

Selection of Suppliers and Supplier Relations

Given the important role of our suppliers in the quality of products and services of Doğuş Otomotiv, you are expected to be fair in the selection of our suppliers and decision-making processes of their selection. Doğuş Otomotiv employees who are involved in any way in the selection of suppliers should pay attention to the following points:

- Administer the selection process in a fair manner, in compliance with laws and regulations, without any direct or indirect discrimination, and in accordance with the principles and policies of Doğuş Otomotiv.
- Give special attention to ensure that suppliers or business partners apply all conducts specified in the Code of Ethics and Supplier Principles, that they conform with strategies and policies of Doğuş Otomotiv, and that they fully understand and grasp focus areas of our Company concerning these matters.
- Keep a printed copy of all supplier contracts and ensure that the opinions and signatures of necessary units are taken prior to approval signatures.
- Do not share any confidential company information with suppliers.
- Do not disclose any information concerning agreements, contracts and business processes entered with a supplier to other suppliers and/or third parties outside the company. This type of information can only be shared with related departments of our Company during business processes and used for business purposes.

SAMPLE CASE

My spouse works as a manager at an educational consulting firm. Could he/she give a proposal to become a supplier of our Company?

ANSWER: If you are part of selection committee of the supplier, this is not permissible. However, if you do not work for the business unit that the supplier engages with directly, and are not included in the selection committee, you don't need to make any notifications.

SAMPLE CASE

I married the executive of the company that has been organizing the events of my department for the past 3 years. What type of disclosure should I make regarding this marriage?

ANSWER: Notify your supervisor and the Human Resources Department regarding the issue. Do not take part in the decision-making mechanisms related to this supplier.

Receiving and Giving Gifts

Gift exchanges or participating in various events with your co-workers may strengthen business relations and are considered as well-intentioned behaviors. However, in instances where such exchanges are contrary to company principles and policies, and against laws and regulations, it may not only damage the reputation of Doğu Otomotiv but at the same time, can be considered as a criminal act legally.

When you encounter situations where you are obliged to accept invitations, receive gifts and/or attend to events as a requisite of your position, you must think about and consider their potential impact on third parties rather than their monetary values. Using your own resources to buying gifts and/or forwarding event invitations for business purposes is absolutely inappropriate. Remember that expenses of such activities must be covered from the approved company budget and should be entered fully and accurately in company records.

SAMPLE CASE

I have received a very valuable watch as a New Year's gift from a printing that we regularly work with. What should I do?

ANSWER: Share the situation with your supervisor immediately. The gift in mention should be returned or donated to a foundation.

Acceptable Gifts

"Gift" is the name given to items with or without any kind of material value, exchanged between you and a member of your family or people with whom you have a close relationship that make the parties involved happy, and help to strengthen relations.

Tickets of events organized for advertising and promotional purposes, digital gifts such as crypto money and shopping vouchers/coupons, attendance to gastronomic, cultural or sporting events and their related invitations are also considered within this scope. In order for the acts related to exchange of gifts to be acceptable in magnitude, they should not be against legislative regulations, and should comply with the following criteria as well:

- It should not be exchanged against the will of the other party.
- It should not be cash or interchangeable as cash (vouchers, gift cards etc.)
- Its tangible value should not disquiet third parties or create doubts among them (accepting gifts from the same persons or institutions within in a calendar year with a value over €100 is not appropriate).
- It should be within the knowledge of your supervisor.

SAMPLE CASE

One of our suppliers wishes to give me a ticket to a soccer match of the team I am a fan of. Can I accept this gift?

ANSWER: If your supplier is also accompanying you in this event, it can be accepted as an activity aimed at improving business relations. However, if the ticket has been presented solely for you to attend, it should be in compliance with the Acceptable Gifts section of the Code of Ethics.

Acceptable Events

Having dinners, or attending to sports or cultural events together with a customer, supplier or business partner are considered as acceptable events. However, invitations that allow you to attend personally on your own (tickets and invitations for a special event or private reservations, etc.) are considered within the scope of 'accepting gifts', rather than attending to an event.

For an event to be acceptable to attend, it should conform to the following conditions:

- It must comply with laws and regulations.
- Our suppliers, business partners or other third parties should be attending the event accompanying our employees, where the conversation is about work-related matters.
- Entrance fee to the event should not exceed TL 400, except those approved by Doğuş Otomotiv General Managers/Doğuş Oto Regional Directors.
- In term of its content, location, and those who attend, attending to events or similar activities that could harm Doğuş Otomotiv's reputation, and events that may include conducts contrary to those mentioned in the Code of Ethics, are absolutely inappropriate.

Prohibited Exchanges

Even if receiving a gift or attending to an event is in compliance with the principles mentioned above, the following situations may make it untenable;

- If it may influence you in your job-related decision-making process,

- If it influences your ability to decide in a fair, appropriate and impartial manner or if it will create a negative or inappropriate effect on the counter-party,
- If you are involved in any way in the selection process of the supplier, be it a person or organization, or if you manage such a process.

Furthermore, under no circumstance may any of our employees receive or offer to give a tip or commission for the work they perform.

SAMPLE CASE

The sales team under my management is preparing a tender proposal for a large-scale company. I would like to invite one of the company executives to dinner to discuss the tender process and ask some questions. Is this an appropriate behavior?

ANSWER: At the proposal preparation/price quote request phase, the tender process has already been initiated. In such a case, it wouldn't be appropriate to contact the other party.

SAMPLE CASE

I'm making collective trip reservations of all our Company executives from this particular travel agency. The agency applies a certain discount to our Company. They offered to extend the same discount for a personal trip of mine. Would it be appropriate to accept his offer?

ANSWER: You may accept if this discount is also extended to our other employees, otherwise you shouldn't. In either case, please inform your supervisor.

Returning Gifts

If a gift presented to you has an exceeding value than what is stipulated in the Doğuş Otomotiv Code of Ethics principles and standards, you should not accept it, stating that the code of conduct of your company does not allow you to do so.

If the gift cannot be returned due to its content (perishable foods, etc.), it shall be donated to a foundation on behalf of the company and with its consent, or consumed altogether with your co-workers. Even if shared this way, the monetary value of the gift cannot exceed TL 200 per person within a calendar year. If you receive a gift that is against the relevant articles of Doğuş Otomotiv Code of Ethics and cannot be returned, notify your immediate supervisor and/or manager next in line.

Accepting Gifts outside the Workplace

In some cases, you may be in a close and friendly relationship with your customers or suppliers. For special occasions, such as weddings, birthdays or child births, gifts may be exchanged outside the company. As long as they do not occur frequently, they can be exchanged provided that your supervisor is informed in advance, in order to avoid any conflicts to occur and have contents that might influence your business decisions.

Accepting Gifts or Event Invitations from Public Employees

When in business relationship with public employees, you must take into consideration all legislative regulations and pay attention to the transparency of these relations. Do not forget that public employees may be subject to different laws and regulations in regards to giving or accepting gifts. All Doğu Otomotiv employees in business relation with public employees are obliged to comply with applicable laws and regulations. If you would like to learn about the laws on this subject, you can contact the Legal Department, following company procedures and practices when doing so.

Bribery, Corruption, Commissions and Borrowing

In Doğu Otomotiv, offering, taking or giving bribes or commissions that constitute a legal crime, are strictly prohibited. When you encounter such an offer or if you are asked to do so, report the situation to your immediate supervisor and/or manager in line or Ethics Line, without delay.

In addition, requesting personal loans from customers, suppliers, Doğu Otomotiv's competitors or third parties or asking for special privileges or discounts different from those offered to everyone, are strictly prohibited as well.

Relations with Employees who are about to Leave or Already Left the Work

You are expected to comply with the principles and policies of Doğu Otomotiv not only while you are currently employed but also after your business contract is terminated. The applicable rules for Doğu Otomotiv's current employees, employees who are about to leave and have already left are as follows:

- While leaving your employment or when retiring, make sure to return all company-provided assets (including Company records and equipment).
- You cannot make use of or disclose any contract that you have entered with Doğu Otomotiv, or information and documentation about your employment status. Moreover, you cannot share any non-public information of Doğu Otomotiv with anyone under any circumstances and conditions, even with former employees of Doğu Otomotiv. If a former colleague insists that you give such information, report the situation to your immediate supervisor and/or manager next in line.

- Except for the cases specified below, you cannot establish a business relation with a former Doğu Otomotiv employee for at least 6 months after he/she has left the job, cannot ask him/her to become an independent consultant, or establish any business relation with or without a contract.
- However, if a written consent is obtained from Board of Directors of Doğu Otomotiv, only then you can establish a business relation with a former Doğu Otomotiv employee within six months after he/she left the job. Even if six months is expired since the former employee has left the job, you must still inform your supervisor when it comes to the purchase of goods and/or services from the company he/she works for.

If you believe that a former Doğu Otomotiv employee is unfairly benefiting from any sort of corporate knowledge that he/she acquired while working in the company, or if you realize that he/she got the possession of non-public information of the Company illegally after leaving the job, report the incident to your immediate supervisor and/or manager next in line or Ethics Line, without delay.

Relations with Competitors

Doğu Otomotiv's business philosophy is based on an ethical, fair and effective competition approach. Doğu Otomotiv products and services are sold with the value they attain, superior quality and competitive prices. If you need detailed information about the laws of competition, you can contact Legal Department, following company procedures and practices when doing so.

Avoiding Situations in Violation of the Competition Law

Agreements between institutions that aim to prevent, disrupt or restrict competition, directly or indirectly, in any specific goods or service market or have the potential to elicit this effect, related actions, and similar decisions and actions of institutional collaborations are against the law and prohibited. (Competition Law of the Turkish Republic Legislation No. 4054 “Law on the Protection of Competition”

(<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=4054&MevzuatTur=1&MevzuatTertip=5>).

If you have questions about the scope of activities explained in summary below, contact Legal Department, following the Competition Law Compliance Program Procedure and its practices. All Doğu Otomotiv employees are obliged to act in accordance with “Competition Law Compliance Program Procedure”.

When you need to have information about competition laws of other countries as required by your job, similarly again, you can get detailed information from the Legal Department.

Competition Law forbids all activities that are anti-competitive, limiting, disrupting the market, causing prices to be fixed by making agreements with competitors and bid rigging.

Moreover, both open-ended contracts and “gentleman’s agreements” are against the law as well.

Conducts violating the law will result in consequences that constitute a crime for both you and Doğu Otomotiv. Therefore, acts and conducts detailed below are strictly prohibited:

Price Fixing: You cannot enter an agreement on the selling prices of products and services with a competitor, or set the price.

Market Sharing: You cannot exchange views with your competitors in marketplaces where competitors or Doğu Otomotiv compete, or about customers, or entering in market sharing agreements with your competitors.

Bid Rigging: You may not enter into agreements with your competitors to change the outcome of a tender or determine the setting of the process. You cannot communicate with the companies you both participated in the tender about the bidding process.

Boycott: You cannot boycott a supplier or customer due to its business relation with one of your competitors. Such a boycott may lead to situations that may result in consequences in violation of legislation regulating competition. The customer you boycotted may have to access products and services by paying higher prices, or you may prevent one of the competitors from entering the market because of this conduct.

In addition to the issues above, you are expected to show the utmost attention on the following as well:

Joint Ventures, Common Actions and Non-Compete Agreements:

Competition legislation does not prohibit all joint ventures or common actions. Sometimes, agreements not including competition factors are allowed. However, such cases are very few and you must discuss such possibilities with the Legal Department. Without the consent of Doğu Otomotiv Senior Management, you cannot suggest establishing a joint venture, set up a partnership or draw up a contract with competitors, with or without the competition factor.

Apart from these, Competition Legislation prohibits some one-sided conducts, even if they are performed by the Company alone as well. This kind of engagements may cause our company to pay large financial penalties consequentially.

By all means, avoid the following conducts and engaging in such activities:

Sabotage: You cannot damage products, sales materials or other assets of competitors.

False Statement-Slander: While talking about a competitor or making a comparison, do not include any statement other than concrete data. Do not add your comments, exaggerate or mislead.

Competition legislation also imposes restrictions on the conditions under which certain operations and marketing decisions can be made. If you encounter any of the illegal situations described below, do not act without consulting the Legal Department, following our company procedures and practices when doing so.

Private (Single) Sales: This means offering to or making sales by asking customers to stop negotiating with other companies.

Determining Retail Prices: This means sales prices of products and services of distributors or retailers to be determined by the Company.

Rejecting Sales: It is the case where the company does not offer the sales service it provides to other customers to another customer. In addition, preventing a sale to actualize by quoting an exceedingly high price to a customer for the same product and service is also evaluated in this context.

Binding Conditions: When the company informs its customers that they have to purchase another product or service in conjunction with the product or service they had purchased, there emerges binding conditions for the sale to actualize.

Bundling: It is the case where the company offers a discount for a product or service if and when it is purchased with another product or service.

Damping (Setting prices below cost): It is the case where the selling price of a product and service does not meet its costs.

SAMPLE CASE

I have a very close friend working for one of our competitors. When we see each other at conferences or other occasions, we talk and chat about the industry in general and attitudes of customers. Am I doing something wrong?

ANSWER: You must be incredibly careful on such occasions. Never talk about Doğuş Otomotiv's contracts or pricing, or ask about anything pertaining to the competitive factor. Do not even joke about any matter related to the job. Although that person is your friend, refuse to talk about any subject containing company information and competitive factors.

SAMPLE CASE

Quite recently, we hired a person who used worked for one of our competitors. Is it ok to ask him/her to provide us some information about this competitor?

ANSWER: Asking others to provide information about a competitor not disclosed to the public, but acquired due to their positions, is in violation of the Code of Ethics.

Collecting Information about Competitors

It is a known fact that collecting information about competitors is an acceptable conduct if it is carried out in accordance with the law. The issue we will address here within the framework of Doğuş Otomotiv Code of Ethics is in which ways such information is obtained. It is not against the Code of Ethics to use public platforms in collecting such information. When doing so, you should fully disclose your identity and make sure that your ID information is not false or misleading. In addition, in case if third parties or consultants you do business with have non-public information about Doğuş Otomotiv, please remind them that they are obligated to act within the scope of Doğuş Otomotiv Code of Ethics as well. If you doubt whether the information about your competitors obtained through your customers is public or not, please seek advice before using them.

Relations with Subsidiaries

In relations with the companies (and related persons) that Doğuř Otomotiv owns or has more than 50% of the shares, make sure that:

- Purchase and sale operations engaged with these companies (including special pricing and discounts for the subsidiaries), and payments made are carried out in accordance with the company policies, all laws and regulations, and all transactions are processed in a transparent manner and properly recorded.

Relations with Related Parties

Relations with all parties related to Doğuř Otomotiv, including its subsidiaries, are carried out in compliance with the policies and principles specified in the Code of Ethics of Doğuř Otomotiv, within the laws and regulations of the Turkish Republic, and are managed within the framework of third-party relations. It is essential for the managers and employees of Doğuř Otomotiv to take Doğuř Otomotiv Code of Ethics into account when carrying out all kinds of activities such as providing information, making payments or engaging in other types of business activities, and conduct all their business affairs accordingly.

International Relations

Doğuř Otomotiv is further obliged to comply with the laws and regulations of countries in which it does business. If your duties or the duties of the personnel working under your supervision include customers or suppliers from foreign countries, you are expected to be knowledgeable about these laws and regulations. In some cases, cultural differences and local traditions or differences in laws are likely to cause problems. Therefore, make sure that you have such information before you start performing your duties.

Services Rendered from Abroad

If you are considering procuring a service or consultancy from a country other than Turkey, you can consult the Legal Department about the laws and regulations of that country, following company procedures and practices when doing so, in case needed.

Compliance with Laws and Regulations

In payments made abroad and commercial activities entered with suppliers and OEMs, legislative regulations being the first and foremost, Doğuř Otomotiv in all circumstances complies with the laws and regulations of the countries, where the establishments we do business with are located.

All third parties that do business with Doğuř Otomotiv are expected to comply with these laws and regulations as well.

Import / Export Control

In terms of import and export operations, compliance with all the laws and regulations (including the laws of the countries where we do business) is among the fundamental corporate policies of Doğuř Otomotiv. Contrary situations may ensue our company to suffer from great pecuniary and non-pecuniary damages, as well as cancellation of Doğuř Otomotiv's import/export licenses, complete closure of the business operations and inflict immense harm to the brand reputation.

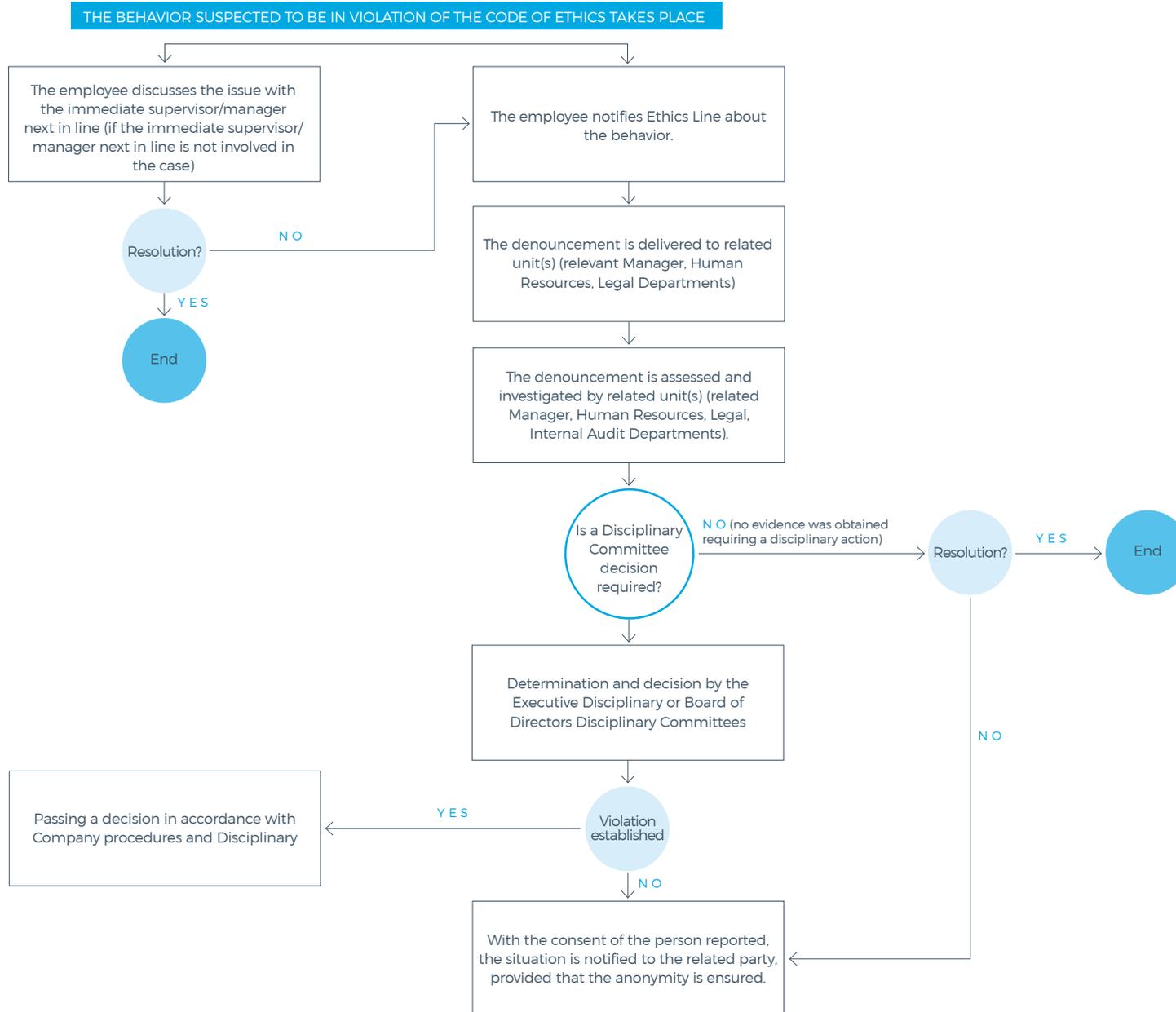
CONCLUSION

It is not possible to define all forms of unethical behaviors and all illegal business processes, nor to capture them within the scope of the Code of Ethics. Your best guiding force is your individual conscience, shared wisdom, common sense and your unconditional compliance commitment to Doğuř Otomotiv's policies and its responsibilities stemming from laws, regulations and contractual obligations. When undecided about how to behave, we urge you to seek support, ask questions and inform the relevant departments about any misconduct without hesitation. Doğuř Otomotiv's principles and policies strictly prohibit confrontation, or retaliation against an employee reporting any behavior that constitutes a crime or a violation of the Code of Ethics.

Not complying with laws and regulations, or Doğuř Otomotiv Code of Ethics as well as other Company policies, procedures, regulations, rules, principles may result in punitive enforcements that may lead to the termination of your employment contract. Such disciplinary actions also apply to senior executives who tolerate or permit inappropriate behavior despite having the knowledge of, delay in taking preventive actions such as providing necessary training in related issues or fail in managing the work of their teams as required, and neglect to report such misconducts.

No persons working in Doğuř Otomotiv can use 'compliance with orders from a supervisor' as an excuse for a conduct that is illegal or in violation of the Code of Ethics.

CODE OF ETHICS CHART



D  **ĞUŞ**
OTOMOTİV