



ETHICAL PRINCIPLES BROCHURE



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**MESSAGE
FROM THE
CHAIRMAN
OF THE
BOARD OF
DIRECTORS**

My dear fellow workers,

In every step our institution takes towards success, our priority has always been our ethical values. We not only aim to achieve our business objectives but also consider adhering to our ethical principles as our most important responsibility. The ethical principles that Saya Holding is firmly committed to are solid foundations that ensure our institution's long-term success while building trust in the business world.

In the process of our company's growth and development, acting in alignment with our ethical values not only strengthens our relationships with internal and external stakeholders but also plays a vital role in our institution's reputation, reliability, and sustainable success. Our ethical principles guide us not only in making the right decisions but also reinforce Saya Holding's role and respect in society.

The ethical principles of our institution serve as a valuable guide that directs our ways of doing business, decision-making processes, and daily activities. Acting in accordance with these principles reflects a commitment to transparency and honesty at every stage of our business processes. Together, we should recognize that these principles are not merely rules but an integral part of our corporate culture, and strive to do what is right every day. Compliance with ethical principles enhances our institution's reliability and makes our way of doing business more effective and efficient.

I sincerely thank you for your commitment to our ethical principles and your determination to embody these values. I firmly believe that by acting in accordance with these principles together, we will shape a brighter future for both our institution and our community.

Sincerely,
Chairman of the Board

OUR VALUES



Human-Centered Approach

Saya Holding always places people at the center of its activities. It uses technology to improve people's lives and benefit society. This value is the fundamental principle that guides all of the holding's activities.

Innovation

Saya Holding continuously prioritizes innovation and focuses on developing new and effective solutions. Innovation enhances the company's competitiveness while offering the potential to add more value to society and the world.

Diversity

Saya Holding views diversity as a richness and promotes it in its activities. It also operates with a values-driven approach to produce business solutions.

Benefit

Saya Holding aims to make a meaningful contribution to society and the world on a global scale. It directs its activities not only towards profit but also in a way that provides social benefit.



“Strong values Strong Future”

■ **Our Vision**

To double the size of our Group in every 5 years.

■ **Our Mission**

Invest in projects that support education and social solidarity policies. Increase the quality of life while also contributing to R&D, exports and employment, the greatest needs of our country.

What is Ethics?

Ethics refers to the set of universal norms that emerge from the common point where different moral understandings intersect. It is a concept related to morality. In other words, we can define this concept as “the moral principles that we call common sense and which everyone can easily approve of”. Ethics aims to define these universal truths and principles.

What is the meaning of Ethical Principles?

For companies, these principles are the rules regarding the values that guide the preferences, decisions, relationships and behaviors of the employee and the company. They are the principles of behavior in relations with all stakeholders.

What is a Stakeholder?

They are individuals, societies, groups, public/private institutions and organizations connected with Saya Holding and its subsidiaries.

Who is the Company Ethics Representative?

Company Ethics Representative refers to the person who coordinates business ethics within Saya Holding and its subsidiaries, guides and advises on questions and issues raised by employees.

What is the Ethical Committee?

Ethical Committee refers to the board that works under the Chairman of the Board of Directors of Saya Holding and decides on the actions to be taken in cases of non-compliance with the Ethical Principles.

Who is the Ethics Committee Notification Officer?

Ethics Committee Notification Officer is the Head of the Ethics Committee on behalf of the Ethics Committee or the Internal Audit Manager, who is appointed by the decision of the Ethics Committee and who is also a member of thereof.

What do Ethical Principles mean for Saya Holding and who does it cover?

Ethical Principles mean determining the expected behaviors and responsibilities of Saya Holding and its subsidiaries managers and employees about what issues they will pay attention to while doing their jobs, how they will work with their colleagues, customers, suppliers and all other stakeholders, how they will interact and communicate with them. Its scope covers all stakeholders associated with Saya Holding.



It would be helpful to ask yourself the following questions if you are undecided about whether any situation/behavior is contradicting the Ethical Principles;

- 1. Is this situation/behavior I've encountered legal?**
- 2. Does this situation/behavior comply with Saya Holding Ethical Principles and Policies?**
- 3. Does this situation/behavior set a good example?**
- 4. Is this situation/behavior in compliance with the values of Saya Holding?**
- 5. Can I explain this situation/behavior to my colleagues and social sphere?**

If you are not sure despite your answers to these questions, you should definitely contact your manager or your company's Ethics Representative or the Ethics Committee Notification Officer via the Ethics Hotline channels.



SECTION 1

Our Ethical Principles



Ethical Principles, nurtured by the values of Saya Holding, always guiding us and determining the way of doing business of the corporation, are given below. Saya Holding undertakes to be consciously aware of these principles and bears the responsibility for this as all employees and the corporation.

1. Trustworthiness and Integrity,
2. Protecting Company Reputation,
3. Refraining from Conflicts of Interest,
4. Taking Care of Information Confidentiality,
5. Responsibility towards Stakeholders

1- Trustworthiness and Integrity

The primary values of Saya Holding in all business relations and business processes are; trustworthiness, honesty, integrity and fair behavior. Saya Holding acts with this behavior principle in its relations with its employees and all other stakeholders; takes responsibility for the implementation of this at the highest level and exhibits a consistent cooperation.

2- Protecting Company Reputation

With the awareness that they represent the Group, Saya Holding employees act honestly and consistently in all their business relations and behaviors, while keeping the Group's reputation above all else. They avoid all kinds of interests, benefits and behaviors that may harm this reputation and establish long-term relationships based on trust.

The relations and behaviors of Saya Holding employees are always in compliance with the Saya Holding Ethical Principles, regulations, procedures and applicable laws. The activities and projects involved must comply with the Saya Holding Ethical Principles and the Group's reputation. The stakeholders are also expected to act in accordance with the Group's reputation.

Equal distance is maintained in relations with the media; in these relations, actions are taken within the framework of Saya Holding Corporate Communication principles. Making a statement to any broadcasting organization, attending an interview, seminar, conference, etc. as a speaker depends on the approval of the senior management. No profit can be gained from these activities. In areas where Saya Holding is represented, employees do not express their own views, but only the views of the company.

No statements are made in favor or against the Company on social media, and the principles of social media usage are followed.

3- Refraining from Conflicts of Interest

Saya Holding employees stay away from the environment, relationships and behaviors that may directly or indirectly lead to conflicts of interest. Employees avoid a conflict or the possibility of conflict between their personal interests and company interests.

Saya Holding employees do not use the Saya Holding name, power, reputation, corporate identity and position to benefit themselves, their families or their relatives, do not derive personal benefit from the persons and organizations with which they have business relations.

4- Taking Care of Information Confidentiality

Unethical methods and practices are not allowed in Saya Holding's activities, business relations and behaviors. Information privacy and protection of private information of employees, customers and stakeholders is given importance.

Confidential information of Saya Holding activities is protected and this information is shared only with authorized persons, provided that it is used for their purposes.

Saya Holding employees are obliged to act in accordance with information security principles. Confidential and private information covers the issues that may create a competitive disadvantage for the Group, trade secrets, patents, methods, formulas, inventions, financial and other information not disclosed to the public, personal rights of personnel, information within the framework of "confidentiality agreements" signed with third parties and all information defined within the framework of information security principles.

5- Responsibility towards Stakeholders

Saya Holding acts with the principle of "Human-First" in all its collaborations. While determining these, Saya works with stakeholders who comply with the law and business ethics. In its relations with stakeholders, the responsibilities listed below are fulfilled.

a) Legal Responsibilities

Saya Holding carries out all its activities in full compliance with national and international laws and regulations, and acts in accordance with universal legal values and human rights. Follows the laws and regulations and takes the necessary measures for compliance therewith. Complies with all national and international laws and ethical rules in its clinical and laboratory studies within the scope of R&D.

Attaches importance to honest, complete and understandable communication with official institutions and organizations; presents the requested information in a timely, accurate and understandable manner.

Ensures that all kinds of commercial and financial records, financial statements or reports prepared by the Group are kept in accordance with national and international accounting standards determined in accordance with current laws and regulations, as well as international financial reporting principles and rules.

Beside the institutions and organizations of the countries in which it is located, Saya Holding remains impartial and at an equal distance to all institutions of the society, especially political parties and non-governmental organizations; approaches the customs, traditions and values of the society with respect.

b) Responsibilities for Our Customers

Saya Holding pays attention to take all kinds of measures that will ensure high customer satisfaction and loyalty regarding the products and services offered.

Saya Holding works with an understanding that responds to the needs and demands of customers in the most appropriate time and in the right way; is sensitive to customers' problems. Saya Holding aims to provide the best service by focusing on changing customer and market needs.

Saya Holding approaches its customers with honest, respectful, fair and courtesy rules, and creates a long-term trust environment for them.

c) Responsibilities for Our Employees

Believing that success is possible and meaningful together with people, Saya Holding considers the creation and maintenance of a working environment where its employees can develop themselves and where they feel peaceful, safe, valuable and happy as one of its most important priorities.

Saya Holding sees “diversity” as wealth, respects it and rejects all forms of discrimination. Saya Holding approaches its employees in an honest and fair manner, commits to a safe and healthy working environment, and ensures that their personal rights are fully and correctly implemented.

Does not employ child labor and workers under the age of 18. Full-time employees of Saya Holding are not paid less than the minimum wage. Regulates working hours, overtime, etc. within the framework of legal compliance.

In all human resources practices, including hiring, career, education, wages and dismissal, discrimination based on language, religion, race, sect, ethnic origin, gender, political opinion and similar reasons is not made and equal opportunities are provided to individuals. Saya Holding makes the necessary effort for the individual development of its employees and takes care to offer them development opportunities in the areas they need. Enables its employees to participate in the decision-making processes of Saya Holding.

Supports its employees to voluntarily participate in appropriate social and social activities in which they will take part with a sense of social responsibility.

Keeps the information of the employees confidential and does not share this information with anyone other than authorized persons and institutions.

In addition to all kinds of immunities of the employees, it also pays regard to their physical, sexual and emotional immunity.

It is against the law and ethical rules to violate the immunity of individuals in any way through physical, sexual and/or emotional harassment in the workplace or any place where they are due to work; this crime will not be tolerated by the Group/Company in any way. In this context, Saya Holding takes all kinds of measures to ensure that its employees work in a business environment where their physical, sexual and emotional immunity is protected.

Violation of one's bodily immunity and/or sexual harassment of a person without physical contact is defined as sexual assault/harassment. Accordingly, it is unacceptable to exhibit any behavior that can be considered within this definition.

On the other hand, “Psychological Harassment in the Workplace” (Mobbing), which is a set of malicious, intentional, negative attitudes and behaviors perpetrated by one or more persons in the workplace against another person or persons, continuing systematically for a certain period of time, aiming to intimidate, pacify or remove from work, harming the personality values, professional status, social relations or health of the victim or victims, is also seen as one of the above-mentioned forms of harassment.

d) Responsibilities for Our Business Partners and Suppliers

Saya and its Group Companies conduct their relations with business partners and suppliers in an honest and fair manner; acts transparently and impartially during the selection process of business partners, and takes the necessary care to fulfill its obligations on time.

Carefully protects the confidential information, corporate and personal integrity of business partners and suppliers; does not work with business partners and suppliers who do not comply with the Saya Holding values and Ethical Principles, fulfill the working conditions, wages and other rights of their employees in accordance with the law, and comply with the law.

Saya and its Group Companies, in all business processes and relations, cooperates with suppliers that comply with rules and principles, act in accordance with commercial and financial regulations in financial integrity, provide a safe and healthy work environment where there is no discrimination and harassment for their employees, pay attention to information confidentiality, and avoid unfair competition.

e) Responsibilities for Our Shareholders

Acts within the framework of financial discipline and accountability; and, manages resources and assets with efficiency and savings awareness.

In the activities of Saya Holding, it is aimed to increase the value of the company. In this, care is taken to establish an optimum balance between profitability and risk management. By giving importance to the continuity of the group, Saya Holding avoids taking unnecessary or unmanageable risks in line with its goal of creating value. Sustainable profitability is aimed.

Shareholders are informed about; the financial statements, strategies, investments and risk profile in a timely, accurate, complete, understandable and within the scope of the legislation.

f) Responsibilities for Our Competitors

Saya Holding undertakes to comply with the rules of fair competition and the laws and regulations that support these rules. On the other hand, also keeps its employees obliged to comply with laws and regulations; and avoids unfair competition.

Saya Holding complies with the competition regulations of the Competition Board and the professional organizations it is a member of, in its initiatives and activities aimed at increasing the competitive advantage and the value of the company, such as mergers, acquisitions, cooperation and joint ventures.

Does not engage in negotiations and information exchanges with competitors to determine the market and/or competitive conditions together. Does not support attempts to restrict or limit competition under any circumstances; and, expects its competitors and business partners to do the same.

g) Responsibilities for Society and Environment

Saya Holding believes that the essence of real competition is respect for society and the environment, and adopts the understanding of "Human-First" in all its processes. Does not work with institutions and individuals who harm the morality of the society and harm the environment and public health.

As an environment-friendly company, it pays utmost attention to protecting human and public health, as well as protecting the environment, both in its own activities and with suppliers and all institutions it cooperates with. Saya Holding complies with all occupational safety and health laws and standards in its work.

Saya Holding takes part in projects that will contribute to the development of the society with its social responsibility awareness and provides support to them.

In investment decisions, environmental pollution and the consequences of using natural resources are taken into consideration. Saya Holding raises awareness of its employees on issues such as environment, protection of resources, energy saving and recycling.

SECTION 2

**Our Policies Supporting
Our Ethical Principles**



- 1. Maintaining the Balance of Interest Policy**
- 2. Policy Protection of Confidential Information Policy**
- 3. Environmental Policy**
- 4. Occupational Health and Safety Policy**
- 5. Quality Policy**
- 6. Social Responsibility Policy**

1- Maintaining the Balance of Interest Policy

It is essential that employees avoid situations that may create conflict of interest. Not using company resources, name, identity and power for personal benefit and avoiding situations that may adversely affect the name and image of the organization are of the most important responsibilities of all employees.

Employees are required to avoid the situations listed below as activities and relationships that may create conflict of interest, and to fully comply with the specified principles.

Activities that May Create Conflict of Interest and Maintaining Balance

Saya Holding employees avoid activities and relationships that will result in a conflict of interest; take care to protect the interests of the company in all their duties; avoid all kinds of activities and behaviors that may mean gaining benefits for themselves or their relatives.

a. Care in Behavior and Relationships

Saya Holding employees are obliged to be in harmony with their colleagues and managers; work in accordance with the essence of teamwork; perform their work honestly and quickly, in good relations with private or official persons, organizations and customers who have a relationship with the company and in accordance with business requirements.

b. Misconduct

If there are family members, close relatives and friends working in supplier companies and customers, these relationships are not allowed to create a conflict of interest.

If there are family members, close relatives and close friends working within the Saya Holding, these relations are not allowed to affect the decisions to be taken within the company.

Employees vested with authority to make purchasing decisions cannot make a purchase decision in the offers made by companies in which their family members, close relatives and friends are directly or indirectly partners. In such cases, a purchasing decision may be made, provided that the General Manager is informed about this issue and approval is obtained.

Saya Holding employees cannot enter into a debt-credit relationship with customers and suppliers, as well as with their colleagues in a way that will damage the company's reputation and relations.

c. Giving/Receiving Gifts and Entertainment

Gifts and entertainment that may affect the preferences and decisions of the company and employees or that aim to influence them are not accepted and cannot be demanded. Likewise, gifts that may affect the other party's decisions are not given.

Invitations for meals, business meetings and social activities from customers and suppliers are acceptable; provided that they do not conflict with company policies and interests and are reasonable. Within a calendar year, gifts amounting to a maximum of one quarter of the gross minimum wage, as well as gifts with the employee's name on it (excluding agenda, calendar, pen) can be accepted with the knowledge of this employee's manager. Gifts above this amount are delivered to the Human Resources Department. Gifts kept by the Human Resources Department are used as gifts to employees in organizations and activities organized therefor.

All promotional activities and promotions for customers are planned according to the relevant laws, regulations, directives and rules of both official authorities and industry organizations, and employees are also expected to act accordingly. Employees shall not receive bribes and/or commissions from any person or institution while performing their duties. In case of violation of this rule, the employee's employment contract is terminated.

d. Protection of Company Assets

Saya Holding employees are responsible for the protection and correct use of company assets and resources. Equipment and other goods of the company (vehicles, tools, company credit cards, spare parts, office supplies, documents, computers, electronic devices, etc.) can only be used for the purposes determined by the company.

e. Side Job Ban

Saya Holding employees, in principle, cannot work in a side job outside the company. Employees can take part in public or private educational institutions, associations related to cultural, vocational and social aids; provided that the written consent of the Chairman of the Board of Directors, General Manager and Human Resources Manager is obtained.

f. Political Activities and Donations

Saya Holding employees, in the capacity of Saya Holding representatives, cannot take part in any political party or association with political purposes and assume management duties. No donations (in cash or otherwise) can be made on behalf of Saya Holding, directly or indirectly, to political parties, political organizations, politicians, representatives of such groups and candidates.

Demonstrations, propaganda and similar activities are not allowed within the boundaries of workplaces. Company resources (building, vehicle, computer, e-mail, etc.) cannot be allocated to political activities.

Employees cannot request donations from company customers and/or other colleagues on behalf of political associations or various organizations and cannot make similar requests.

g. Relations with the Media

Making statements to the written and visual media, such as magazines, bulletins, newspapers, television, radio, etc., regarding the company's activities, participating in conferences as a speaker, making interviews, and taking the approval of the General Manager and/or the Chairman of the Board of Directors within the framework of the rules determined in the internal regulations of the company.

In case the employees take part as a competitor and/or active participant in the programs in the media other than their job identity, written permission of the Chairman of the Board of Directors and the General Manager must be obtained.

2. Protection of Personal Data Policy

Saya Holding attaches importance to the confidentiality of information and protection of private information of employees, customers and stakeholders in its activities and business relations.

Employees are obliged to keep confidential and proprietary information about production, business, customers and other professional matters that they learn about the company and its activity, whether or not it is related to their work. Employees may not disclose or give the secrets, information and related documents they have learned to the public or to other persons or competitor organizations. This obligation continues even if the employee's relationship with the company is terminated.

3. Environmental Policy

Saya Holding defines environmental dimensions, identifies risks and takes proactive actions to eliminate the negative effects of its activities on the environment at its source.

Saya Holding aims to ensure the continuity of the environmental management system and is committed to continuous improvement through revisions.

Supports projects that will reduce natural resource consumption and encourage recycling. Fulfills the legal obligations concerning the Group and gives importance to the suggestions of its stakeholders on environmental issues within the framework of national legislation.

Provides sufficient resources to provide training for employees and stakeholders on environmental issues and supports efforts to raise awareness.

4. Occupational Health and Safety Policy

Saya Holding aimed to create a healthy and safe working environment to protect the health of all employees and prevent them from being harmed. Employees act in accordance with the rules and instructions set therefor and take the necessary precautions.

Saya Holding aims to ensure the continuity of the Occupational Health and Safety management system and is committed to continuous improvement through reviews.

Saya Holding ensures that employees receive first aid, preventive health and safety services by taking measures to prevent employees from catching occupational diseases.

Provides sufficient resources to provide training for employees and stakeholders on Occupational Health and Safety and supports efforts to raise awareness.

Provides sufficient resources to provide training for employees and stakeholders on Occupational Health and Safety issues and supports efforts to raise awareness.

Employees may not keep any item or substance that poses a danger to the workplace and/or workers or that is illegal.

5. Quality Policy

The quality policy of Saya Holding, in line with the purpose of its establishment and includes the expectations of all its employees and customers from the company, is stated below.

To establish the Quality Management System in accordance with national and international standards, To provide safe, effective and appropriate quality products and services,

To carry out production activities by using natural resources and energy resources efficiently, with an environmental protection conscious approach,

To provide appropriate working conditions by meeting Employee Health and Occupational Safety standards,

To blend this with innovative approaches with adopting sustainable development as a way of life,

To constantly review the quality level with the participation of all employees, based on customer requirements and satisfaction,

6. Social Responsibility Policy

According to Saya Holding, like individuals, companies are also responsible to the society in which they are involved and from which they make gains.

Saya Holding, which set out with the principle of “The Most Auspicious of You is the Most Beneficial One”, supports social responsibility projects in different fields in order to increase the quality of social life.

SECTION 3

Our Responsibilities



Responsibilities Of Our Employees

To act in accordance with laws and regulations in all circumstances,

To read our Ethical Principles and to know, understand, internalize and act in accordance with the rules, principles and values,

To learn the policies, procedures and instructions applicable to the Company and related to the Company's general and business, To act with common sense and avoid wrong behaviors from the start,

To express concerns, determinations and opinions without hesitation in possible violations of the Code of Ethics, company policies or the law, and other matters,

To cooperate with the Company Ethics Representative and the Ethics Committee in ethical investigations, keep information about the investigation confidential.

Responsibilities Of Our Managers

Managers are expected to encourage and set an example for their colleagues on the Ethical Principles by exhibiting the following behaviors.

To ensure the creation and maintenance of a corporate culture that supports the Ethical Principles, To set an example for the implementation of the Ethical Principles with his/her behaviors,

To train his/her employees on Ethical Principles,

To support the employees in raising questions, complaints and notifications regarding the Ethical Principles, to create an environment where employees can easily voice their problems,

To provide guidance on what should be done when consulted, to take into account all notifications and, when deemed necessary, to convey them to the Ethics Committee as soon as possible,

To structure the business processes under his/her responsibility in such a way that there is no dilemma in terms of ethical principles,

To intervene without delay in violations of the Group's values, the Ethical Principles and the law, and to report these to the Ethics Committee.

SECTION 4

Notification of Violation of Ethical Principles and Case Studies



**Notification of Violation of
Ethical Principles and Case Studies**

Employees are obliged to report the violations of the Ethical Principles primarily to their direct managers, and if the situation is related to the directly affiliated manager, to the Company Ethics Representative, Ethics Hotline and/or Company General Manager, and if no action is taken regarding the incident and no results can be obtained, to the Ethics Committee directly.

Ethics Hotline is the set of communication channels where actions that are considered to be against the Ethical Principles and the law can be reported in Saya Holding and its subsidiaries.

**The notification channels allocated for employees to reach the
Ethics Committee Notification Officer are;**

- E-form accessed from the Ethics Hotline Notification Platform link on the web site of Saya Holding and its subsidiaries.
- **etik@sayaholding.com** e-mail address
- **0531 101 15 55** hotline
- Written or verbal notification to the Company Ethics Representative

Furthermore, the employees can also apply directly to the Ethics Committee by mail. Applications directly to the Ethics Committee should be sent to the address below by writing **“Attention; Ethics Committee”**.



Ethical Committee

Address: Eski Büyükdere Cad. Link Plaza No. 3-5, Kat 4-5
Maslak - İstanbul

Violators of the Code of Ethics, relevant policies and procedures will be subject to a variety of disciplinary sanctions, up to and including, if necessary, their dismissal.

Disciplinary sanctions will also be applied to those who approve, direct or have knowledge of inappropriate behavior and acts that cause violation of the rules, but do not make the necessary notification properly.

Case Studies

Question: My colleagues at work asked me about my salary. Should I share it?

Answer: Your salary information is private and confidential. You should not share this information with anyone other than your manager and the Human Resources department.

Question: A supplier of mine has started to experience some financial problems and has requested us to pay him before the due date. How should I proceed?

Answer: Share the matter with your manager immediately and depending on the criticality of the supplier for your company, you may also want to pass the matter on to our finance department and ask to check its ability to fulfil its obligations within the framework of the financial risk management instructions that are listed by your company's Legal department to make the payment or not.

Question: I saw a false/negative news article about our Company somewhere on the internet. I would like to respond by writing a comment here. Is there any violation of Ethical Principles?

Answer: Yes. You should transfer the matter to the department responsible for communication activities on behalf of your Company and inform your manager.

Question: My manager asks me to help him with personal matters during working hours. For example, shopping for his wife, taking his daughter to school, banking I have to take care of his business, sell his summer house, and so on. This is distracting me from my main task. What should I do?

Answer: The time you spend during working hours is a company asset. Inappropriate use of company assets is against ethical principles. Please raise the issue with your senior manager or the Company Ethics Representative.

Question: A friend of mine asked for the email addresses of company employees for a survey about his job. What should I do?

Answer: The confidentiality of Saya Holding employees' information is under the responsibility of the company. Please share the issue with the Human Resources Department and ask for support.

Case Studies

Question: I make the collective travel reservations of company executives through a tourism agency. The agency applies a certain discount to our company. They offered me the same discount for my personal travel. Would that be appropriate?

Answer: You can accept this discount if it applies to other employees, otherwise it should not be accepted. In any case, please contact your administrator or Inform the Company Ethics Representative.

Question: We are taking a group photo with my teammates in the company. In the background, there are details of various R&D studies, know-how, project information. Is it against the Code of Ethics to share it on social media?

Answer: It is against the Code of Ethics as it carries the risk of sharing company confidential information.

Question: Employees of one of our departments at your workplace celebrated as a department during working hours and consumed a glass of alcohol. Does this situation comply with the Code of Ethics?

Answer: According to the Turkish Labor Law, it is strictly forbidden to drink alcohol at work during working hours. It may result in the termination of your employment. However, in a special case, small organizations can be organized outside of working hours with the approval of your manager. Like a New Year's party.

Question: I received a phone call outside of working hours, in a crowded environment outside the workplace, where I have to give information about work. There are details I have to answer. What should I do in this situation?

Answer: In this case, you can go to a suitable, quiet place where no one can hear you and call your manager back. There may be suppliers, competitors or company employees around us who are related to your business. We should take care not to talk about work in crowded environments to avoid the risk of unwittingly disclosing company information. Please share the issue with the Human Resources Department and ask for support.



Ethical Principles Commitment

I have read and understood the Saya Holding Ethical Principles.
I accept and undertake to work in accordance with the Ethical Principles of
Saya Holding and its Affiliated Companies.

Committed By:

Name Surname:

Date:

Company:

Signature:

Position:

SAYA

Thank You.

sayaholding.com