



## **PEKER GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş. ETHICAL PRINCIPLES**

Peker Gayrimenkul Yatırım Ortaklığı A.Ş. “Code of Ethics”, which all managers and employees are obliged to comply with, is defined in order to increase the corporate value of our Company, to increase the quality of service, to regulate the relations of employees with the society and other colleagues, and to prevent unfair competition. It is a set of principles that regulates the relations of company employees among themselves and with the society, and at the same time forms the culture of behavior within the company.

The Board of Directors, managers and all employees are expected to comply with the code of ethics. The aim of these rules is to ensure the creation of the necessary transparent, honest and reliable communication environment in all kinds of decisions and business management processes related to our Company, in the final goals set and in the management of relations with shareholders as a public company, being aware of the corporate effects of the behaviors and attitudes of our Company employees.

### **1. Activity Standards**

- It is essential that the Company's activities are carried out within the framework of the principles of transparency, honesty and integrity.
- It is essential to comply with all legal rules and restrictions in connection with the Company's activities.
- Respect for the rights and freedoms of employees and persons, institutions and organizations with whom they are in contact within the framework of their activities.

### **2. Shareholders**

- The Company's main objective is to create added value and ensure that shareholders' investments are managed and valued in the most effective manner.
- Each shareholder is given the same value regardless of the amount of shares held.
- Shareholders are guided and informed in accordance with the relevant legislation published by the CMB.
- Changes in the Company's financial status, field of activity, directors, etc. are updated on the website so that shareholders are informed about the developments.
- Shareholders' requests for information about the Company, excluding confidential and commercial information that has not been disclosed to the public, are met as soon as possible.
- An environment suitable for the use of various communication channels is prepared for shareholders to communicate easily

### **3. Board of Directors**

- Members of the Board of Directors shall not yield to pressures that may result in consequences against shareholders, shall not accept material benefits, and shall not cover up any corruption.
- Members of the Board of Directors shall not disclose to the public any confidential and trade secret information about the Company.

### **4. Employees**

- Employees must act in compliance with laws, legislation and internal regulations.

- It is ensured that all rights of employees recognized by law are protected. It is ensured that the personal rights of each employee are fully/accurately and on time. The necessary groundwork is laid for a safe and healthy working environment.
- Employees are treated fairly and equal opportunities are offered under equal conditions.
- It is unacceptable for any employee to be subjected to psychological harassment such as discrimination, exclusion, intimidation, etc. or to cause similar discomfort.
- It is unacceptable for any employee to be harassed or harassed sexually, socially or physically, or to cause such harassment.
- Employees are expected to embrace and protect the Company's name and reputation.
- Employees are obliged to work in harmony with their colleagues and managers in the workplace, to establish good and humane relations with private or public persons and organizations that have a relationship with the workplace, and to perform their work honestly and promptly.
- In the event that employees are found to violate the principles of business ethics, this situation must be reported to the Management with documents.
- Employees are obliged to protect the interests related to the business and workplace carried out by the Company and to refrain from any behavior that may harm this interest. In this context, employees may not use Company facilities for their personal interests, may not engage in any illegal attitude or behavior, and are obliged to inform the Management of any offers that provide them with benefits.
- Employees may not accept official or private, permanent or temporary, paid or unpaid duties, and may not engage in trade without the permission of the organization.
- Employees are obliged to keep the information and secrets they learn about their work and the organization, whether or not related to their duties. The secrets, information or documents related to them cannot be given or disclosed to unauthorized persons or authorities. This obligation continues when the employee's relationship with the organization ends.
- The employee is obliged to notify and submit to the Human Resources Department in a timely manner any changes in his/her family, marital and address status, as well as any personal, family or relatives-related information and the documents on which they are based in terms of the rights and obligations set out in the contracts and/or regulations.
- Personal information of employees and job applicants is confidential/protected.
- Each employee's suggestion for improving the organization and processes is seen as an opportunity and forwarded to the relevant unit manager.

## **5. Customers-Competitors-Suppliers**

- It is essential that relations with customers and suppliers are carried out on a long-term, trust-based, professional basis that will produce results in favor of the Company.
- Care is taken to develop cooperation with partners who embrace the Company's ethical values.
- No goods or services are offered that may harm and/or mislead customers.
- No contacts or agreements are made with competitors for the purpose of boycotting customers or suppliers.
- Our Company recognizes its duty to act in accordance with the principles of fair competition in its field of activity and expects other companies operating in the sector to act with the same sensitivity.
- No negative statements are made in the press against competitors and their executives by name.
- No agreements are made with competitors to prevent new competitors, to fix prices of goods and services, or to share regions/markets/customers.
- Unethical or illegal means of accessing information about other companies are not used, and employees are prevented from using such means. However, it is permissible to use publicly available information about companies (websites, price lists, advertisements, published articles, etc.).
- Suppliers' and customers' information (commercial, personal, etc.) is kept confidential/protected.

## **6. Receiving and Giving Gifts**

Gifts that may go beyond the purpose of the gift (overshadow the impartiality of the other party/have a high financial value), that may put the parties in a difficult situation cannot be given to the companies/employees with whom we have a relationship, and such gifts cannot be accepted by managers and employees.

## **7. Public Disclosure**

- No employee may make verbal or written statements on behalf of the Company, except for the assigned departments.
- The disclosure tools included in the Company's Disclosure Policy are used in a way to ensure that shareholders and stakeholders benefit from them at the maximum level and in the easiest way.
- It is ensured that the issues that the Company is obliged to disclose to the public, as well as the information required by shareholders and stakeholders, are provided and updated in an easily accessible and equal manner.

## **8. Social Responsibility**

- The Company acts with a sense of social responsibility while operating in its sector.
- The Company supports its employees to voluntarily participate in social and community activities to raise awareness of social responsibility.
- The Company pays utmost attention to protecting the environment both in its own work and in the work of its business partners.
- The company uses natural and energy resources efficiently and prevents waste.

## **9. Compliance with Rules**

Without exception, all employees and managers will strive to implement these principles to the fullest extent. In addition, employees are obliged to immediately inform the management in case of detection of any violation of ethical rules. If there is any job loss due to compliance with these rules, this will not be considered as a negative.

The Code of Ethics is defined, updated and amended by the Corporate Governance Committee. The Code of Ethics is published on the Company's website and in the annual report after approval by the Board of Directors.