

BORUSAN OTOMOTİV GROUP BUSINESS ETHICS AND COMPLIANCE PRINCIPLES HANDBOOK



BORUSAN OTOMOTİV GROUP BUSINESS ETHICS AND COMPLIANCE PRINCIPLES HANDBOOK

Dear Colleagues,

We, as Borusan Otomotiv Group employees, perform our job duties at all times fairly and honestly.

What is expected from each of us is to behave and act in the name of our Company at all times and under all circumstances in compliance with the highest ethics and integrity principles and to protect and further enhance the corporate reputation and prestige of our Company.

We, as Borusan Otomotiv Group, have, since 1984, developed and generated an enviable reputation and prestige in our sector, in the whole business world and in the eyes of the manufacturers of brands we are representing. Protection of this reputation requires each of us to act responsibly and comply with laws and ethical rules.

All our employees must learn, know and comply with all applicable legal requirements and all Company policies with regard to their own jobs and duties. If you have subordinates, you are further expected to take actions in order to assure that such subordinates also learn, know and follow the relevant current laws and rules.

We, as employees, must internalize all ethics and compliance principles mentioned in the handbook attached to this letter, and adopt the same in all our fields of business.

This handbook stands as a guide for you to understand all ethics and compliance principles adopted by our Company and to assess your own behaviors in the light thereof.

Each employee is expected:

- To act honestly; and
- To be wholehearted and straightforward; and
- To comply with laws; and
- To comply with ethical principles and
- To be accountable.

For the sake of protection and maintenance of high reputation and prestige of our Company, I am sure that each of you will perform his/her job duties in strict compliance with ethics and compliance principles outlined in this Handbook.

With my best wishes and regards,



Eşref Biryıldız
Chairman of the Executive Committee

INDEX

Purpose	5
1. Our Business Ethics and Compliance Principles and Responsibilities	6
1.1. We comply with laws and regulations	8
1.2. We act honestly	8
1.3. We feel responsible towards our employees	9
1.4. We feel responsible towards our customers	9
1.5. We feel responsible towards our shareholders	10
1.6. We feel responsible towards our competitors	10
1.7. We feel responsible towards our business partners and suppliers	11
1.8. We are responsible and sensitive towards environment	11
1.9. Importance of confidentiality for us	12
1.10. We feel responsible towards governmental authorities, political figures and media organizations	12
2. Security	14
2.1. Workplace security	16
2.2. Data and information security	16
3. Responsibilities of Company Employees and Other Stakeholders	18
3.1. We represent our Company optimally	20
3.2. We take pains in protecting the Company assets	20
3.3. Our employees and other stakeholders feel themselves responsible towards	21
4. Conflict of Interests	22
5. Implementation and Supervision of Our Ethics and Compliance Rules	26
6. Composition of Ethics Committee	30
7. How Should We Assess and Share Our Fears and Concerns?	34
7.1. Assess Your Acts and Ask For Help	36
Definitions	37
References	38

ACT HONESTLY
BE WHOLEHEARTED AND
STRAIGHTFORWARD
COMPLY WITH LAWS
COMPLY WITH ETHICAL
PRINCIPLES
BE ACCOUNTABLE

Notes: In the text of this Handbook, certain words or phrases have been written in orange. These terms are defined in the “Definitions” part of the Handbook.

What is the purpose of this Handbook? **What does it mean for our Company?** **How is it used?**

This Handbook serves as a brief guide reflecting the rules and principles of conduct expected from you in the course of working in or serving to Borusan Otomotiv Group (“Company”). This Handbook is by nature a summary of basic Company policies and legal requirements affecting our business. This Handbook will help you to understand and detect the emergence of a potential ethical or legal problem, and will tell you which resources and/or which units to apply for more information thereabout.

For detailed information about the matters mentioned in this Handbook, you may consult to the **Internal Audit and Ethical Compliance Department** or to the **Internal Audit and Ethical Compliance Officer**.

The principles depicted in this Handbook are applicable on all definite or indefinite time, half-time and temporary employees, and stakeholders, and business partners and their personnel in our Company, and independent suppliers of the Company, particularly its business partners within its authorized sales and service network.

Enforcement of laws, employment contracts and special policies may differ all over the world. In the case of discrepancy of local regulations and employment contracts with Company policy, the local regulations and employment contracts prevail over the Company policies. The Company policies must be determined in accordance with local regulations and employment contracts. If you are not sure about which policy to follow in your business processes or you feel it necessary to get detailed or current information about the matters mentioned in this Handbook, please consult to the Company’s **Internal Audit and Ethical Compliance Department** and **Legal Department**.

Please do not ever forget that breach of applicable current regulations or Company policies may result in termination of employment contract or disciplinary punishments. Such breaches may further harm the reputation of our Company and pave the way for loss of sales and profit. As for the persons or entities being business partners of our Company, such a breach may lead to contractual liability of the relevant person or entity, who may be held liable to indemnify the resulting damages.

OUR BUSINESS ETHICS AND COMPLIANCE PRINCIPLES AND RESPONSIBILITIES



1. Our Business Ethics and Compliance Principles and Responsibilities

1.1. We comply with laws and regulations

Breaches of laws and regulations may lead to such serious results as fines and liquidated damages for the Company. It may further damage the Company's reputation and thus, the Company's market reputation as a supplier of prestigious products and services may substantially weaken.

Our principles declared in this Handbook are applicable in our relations with our employees, customers, suppliers, business partners and their personnel in our Company, as well as public authorities.

The Company acts according to the universal law principles and the human rights by performing all of its local and foreign activities and operations in strict and full compliance with national and international laws and regulations.

The Company has fully adopted the principles of UN Global Compact.
The Company does not permit or allow its employees to act unlawfully.

In the case of a doubt of discrepancy of the Company policies, procedures, written rules, financial and commercial records and instructions with the applicable laws in internal and external activities and operations of the Company, the applicable laws shall prevail.

It is a must for the Company to keep and issue all kinds of its financial and commercial records and financial statements and reports in strict compliance with not only the current applicable laws and regulations, but also national and international accounting standards, and international financial reporting principles and rules.

In the case of an indication of breach of law in internal or related activities of the Company, the suspicions or concerns are consulted to the Company's **Internal Audit and Ethical Compliance Department** or **Legal Department**.

1.2. We act honestly

The Company, in all of its activities and operations, places special emphasis on honesty, transparency and high business ethics values, and expects all of its business partners and stakeholders to act accordingly.

In the case of destruction and termination of this mutual trust environment, and if and to the extent it cannot be recovered, in a business relation, the Company immediately terminates its relations with the relevant party.

The Company does by no means act towards its employees, stakeholders, business partners and their personnel, suppliers, competitors, environment, community and humanity in such manner to destroy the mutual trust environment in its business relations.

1.3. We feel responsible towards our employees

Mutual trust is essential in relations of the Company employees with each other. Positive and transparent relations are an indispensable part of the working life.

Success of the Company depends on the loyalty of its employees to their workplace. To assure the job satisfaction of employees, and to ensure that they come to their workplace every day with the same joy and desire and live happily therein, is the responsibility of both the Company and all of its employees towards each other.

Our employees use constructive and improving behaviors based on team spirit in all kinds of their communications with their superiors, subordinates and peers. To adopt a solution-oriented, leading and result-focused style in all of their relations will at the same time guarantee a joyful and peaceful working atmosphere in the Company for them.

The Company has adopted UN Global Compact, and does not approach negatively and act discriminatively towards any person due to race, ethnical origin, skin color, nationality, sex, religion or beliefs, disability, age, marital status, sexual orientation or other individual characteristics protected by laws. No-one can bestow a privilege upon, or wear away at, or harass, anyone inside the Company or among its internal stakeholders.

1.4. We feel responsible towards our customers

We approach our customers in a satisfaction-driven manner. We act carefully, honestly and fairly to all customers so as to create the highest level of customer loyalty and satisfaction. We treat all our customers equally and do not lend a preferential treatment to anyone.

The goals are to continuously improve the quality of products and services in tandem with the requirements of customers and to meet all demands accurately and timely. All our products and services are offered under our corporate assurance and guarantee.

The required and accurate data and information about customers are processed, recorded and protected in compliance with the relevant laws and confidentiality rules.

Information acquired about customers are used solely for provision of services to customers or for future-oriented improvement and development purposes.

We do not work with customers who breach the laws and fail to abide by our business ethics rules.

1.5. We feel responsible towards our shareholders

In order to win the trust of its shareholders and investors and to maintain such trust, and for the sake of management of its resources as effectively as possible, the Company takes its decisions in reliance upon rationalist and scientific criteria and with financial discipline and accountability.

Partnership relations in the Company are long-term and based upon mutual trust, and the rights and interests of shareholders are protected and observed primarily in regulation of internal activities.

The Company employs an honest, accurate and transparent commercial and financial reporting system based on commercial and financial discipline and in accordance with the applicable laws and rules, and provides a regular information flow to the relevant people and entities, stakeholders and governmental authorities.

The Company's commercial and financial reports are audited by internationally accepted independent audit firms.

1.6. We feel responsible towards our competitors

An honest and ethical competition is desired, and unfair competition is avoided, within the frame of the compliance law and ethical principles. Competition is based only on legal and ethical grounds. Attempts to restrain or restrict the competition are not supported under any circumstances whatsoever.

In the case of projects and operations aimed at increasing the competitive power and value of the Company such as merger, collaboration or joint venture with, or acquisition of, other local and foreign companies, the Company acts in conformity with the regulations and guidelines of the Competition Board.

The Company believes in creation of a fair competition environment and a competitive structure in its community and sector, and accepts and supports the initiatives intending to create, maintain or further develop such an environment and structure.

The Company does in no case enter into market-related agreements with its competitors particularly with respect to prices, price offers, working rules and conditions, production plans, sales quotas or market shares, and also expects its competitors and business partners to act and behave accordingly.

Breach of unfair competition laws may have serious results. Included among such various and vast results are monetary damages and fines, imprisonment, and legal liabilities. In the case of legal problems relating to procedures of conduct, and suspicions or concerns relating to unfair competition issues, the Company's **Legal Department** must be consulted at all times.

1.7. We feel responsible towards our business partners and suppliers

We manage our relations with our business partners and suppliers honestly and fairly, and act transparently and impartially in the process of selection of business partners, and take pains in timely performance of all of our obligations.

We believe that the goods and services provided by our business partners and suppliers have direct effects and reflections on the quality of own goods and services of our Company, and for this reason, we select all our suppliers and business partners from among entities which strictly comply with the desired qualities and standards.

Confidential information of business partners and suppliers are protected meticulously. We do not work or collaborate with business partners and suppliers who breach the laws and fail to comply with business ethics.

The Company and its employees are not permitted to accept gifts which may negatively affect their objective decision making abilities in the course of selection of business partners and suppliers.

The Company and its employees, in all of their relations with business partners and suppliers, act and behave in such manner not to create an impression of a relationship of interests in the eyes of third parties.

1.8. We are responsible and sensitive towards environment

The Company is aware of its special responsibilities for compliance with environmental laws, and shows maximum efforts in order to raise awareness of the Company employees, customers, business partners and suppliers and of public on environmental issues.

Environmental laws contain binding principles and standards for the Company, and accordingly, the Company knows and complies with all environmental conditions and rules instilled by the applicable laws and regulations and adopted by the Company in the course of its activities and operations.

The Companies carries out its operations at its premises in a safe, secure and environment-friendly manner in conformity with the available social conditions and the requirements of its employees.

The Company works in coordination with an **Occupational Health and Job Safety and Environment Specialist** for helping you to understand and fulfill your responsibilities.

Our employees are not allowed to act in conflict with the environmental protection policy.

1.9. Importance of confidentiality for us

The classified confidential information, and information about customers, suppliers and business partners, and trade secrets of the Company cannot be used for any purpose other than the motives of the Company, and cannot be shared with any person or entity other than the relevant persons.

All kinds of corporate, individual and similar other information belonging to the Company are, unless otherwise provided and unless otherwise permitted by authorities, considered, processed and protected as confidential and trade secrets, and may be used only for the Company's own purposes.

Corporate and individual data and information may be used and/or disclosed only for compliance with the laws and only if permitted by authorities.

Any person who has access to unauthorized information by any means and for any reason whatsoever will send a notice to the Company's and **Internal Audit and Ethical Compliance Department** and **Legal Department** in connection therewith.

All corporate and official statements are disclosed openly and understandably through authorized units and in line with the principle of equal treatment to all relevant parties.

The Company's employees, stakeholders, business partners and suppliers do not share any confidential information, coming to their knowledge in the course of performance of their works, with third parties at the time of or after termination of their relations with the Company.

1.10. We feel responsible towards governmental authorities, political figures and media organizations

The Company establishes open and honest relations with governmental authorities in strict compliance with the applicable laws and regulations, and within the frame of ethical rules and principles, and by protecting all legal rights and interests of the Company.

The Company does not support any political party, and is at an equal distance to all political parties.

Any monetary or non-monetary benefit or any inappropriate and unreasonable gift may not be offered or given to civil servants, political figures, judges or prosecutors, and members and representatives of other public administrations in such manner to cast a shadow upon their impartiality or to breach the laws.

Information about the Company may be disclosed to governmental authorities, courts or media organizations or be published in social media only by the authorized managerial bodies. Unauthorized employees or stakeholders cannot express any opinion in the name of the Company or in their own name without a prior consent of **Corporate Communications Department**.

The Company members are expected to act responsibly and carefully in the use of special media or social media in compliance with the corporate business ethics and personal ethics rules and principles.

All donations to be granted to official entities and institutions or public administrations and economic enterprises are required to be reported to the **Internal Audit and Ethical Compliance Department** for presentation to the approval of the **Ethics Committee**.



SECURITY



2. Security

2.1. Workplace security

In each of its workplaces and premises, the Company acts in accordance with the applicable laws and regulations and the relevant Company procedures pertaining to occupational health and job safety.

The Company makes sure that both its own employees and the employees of its suppliers and business partners work in safe and healthy conditions. This principle lowers the accident risks and ensures the problem-free and sustainable operation of the systems.

The Company management gives support to, and handles, activities aimed at raising the awareness of employees on job safety and occupational health issues.

The employees may express their opinions and ask their questions on job safety to the **Occupational Health and Job Safety and Environment Specialist**, and get support from him.

2.2. Data and information security

The Company abides by the data protection laws and regulations.

Information belonging to the Company is accepted as a very valuable asset and should be managed and stored safely. Company information, including, but not limited to, information stored in the Company computers or other electronic storage devices, are information received, obtained or recorded by employees during performance of their job duties, and they belong to the Company.

The Company takes into consideration and implements the data protection laws while using the data and information about customers, employees, business partners and suppliers. **Borusan Otomotiv Management Information and Quality Systems** give support to other departments in relation therewith.

Personal data and information may be processed or used only for purposes permitted by the relevant laws. The Company has adopted the principles of prudent use of personal data and information and of transparency and security in data transactions.

In processing its corporate information, the Company takes care of data security problems of all of its stakeholders, particularly its employees and strategic business partners.



RESPONSIBILITIES OF COMPANY EMPLOYEES AND OTHER STAKEHOLDERS



3. Responsibilities of Company Employees and Other Stakeholders

3.1. We represent our Company optimally

The Company employees and other stakeholders (the term “other stakeholders” will hereafter be used for business partners and their personnel and for suppliers) trust the Company thanks to its professional competence and integrity. All employees try to keep this reputation at the highest level possible.

Our employees and other stakeholders avoid all kinds of behaviors and conditions which may destroy the reputation and image of the Company, and abide by the generally accepted corporate practices with their clothing, attire and behaviors, and take care of their behaviors knowing that they represent “**The Company**” also at off-hours.

Our employees and other stakeholders provide their services within the frame of the Company policies, professional standards, commitments and ethical rules, and make self-sacrifice for performance of their obligations.

The employees should not avoid to express their opinions and ideas like the Company and they should take care ultimately not to arise such like these perceptions.

Our employees and other stakeholders give information to, and get prior consent of, the **Corporate Communications Department** about media and press statements relating to the Company.

3.2. We take pains in protecting the Company assets

Our employees and other stakeholders are responsible for protection and correct use of properties and other tangible assets of the Company. The Company-owned equipments and other properties (e.g. motor vehicles, tools, spare parts, office materials, documents, computers, electronic devices, etc.) may be used only for the Company purposes. All such assets are required to be protected against loss, theft, damages and misuse.

Our employees and other stakeholders use the Company’s fixtures, tools, instruments and items for the intended purposes thereof, and avoid wastage, and refrain from using them for their private affairs or purposes. The Company makes sure that its assets and resources are used efficiently during the working hours.

Our employees and other stakeholders take all kinds of actions and measures in order to protect such assets as trademarks, reputation, intellectual capital, trade secrets, and business- related information belonging to the Company.

3.3. Our employees and other stakeholders feel themselves responsible towards our Company

Our employees and other stakeholders are under obligation to be informed about the Company values, and principles and rules of conduct of business, and procedures and regulations in connection therewith. Negative results of breach of these rules are reported to the **Internal Audit and Ethical Compliance Department** for discussion in the **Ethics Committee** if deemed necessary by the relevant executive or employee.

In the course of performing their job duties carefully, meticulously, loyally, timely, efficiently and in the best manner possible, our employees and other stakeholders are under obligation to act in harmony with their colleagues and superiors and to protect the Company interests to the maximum extent possible. In addition, in performance of their job duties, our employees and other stakeholders are also obliged to comply with the laws pertaining to occupational health and job safety.

Duties and responsibilities of our employees and other stakeholders are determined by their employment contracts, job definitions, implementation principles and regulations. All and any matters on which job definitions or guidelines remain silent are governed by the pertinent provisions of the Labor Act and associated regulations and bylaws. The works needed for full performance of a job are, even if not specifically mentioned in employment contract or job definition, included in the contents of that job, and the employee cannot refrain from performing them on the ground of non-inclusion in the job definition. Our employees and other stakeholders are under obligation to fulfill the requirements of job definitions given as an attachment to the employment contracts.

Our employees and other stakeholders are obligated to comply with all instructions of their superiors completely and timely, and to abide by all kinds of precautions taken with respect to Occupational Health and Job Safety, and by the rules stipulated in the relevant provisions of the Labor Act, and by other practices reported to the employees in the internal regulations of the Company.

The Company employees may, without a prior written consent of their employer, not accept any official or private, permanent or temporary, paid or unpaid job outside the Company. Nor may they directly or indirectly engage in any trading business, whether covered by the fields of business of the Company or not.

The employees or their close family members may, as long as they continue to work in the Company, not enter into any partnership or other business relationship with other companies, suppliers or customers operating in the same fields of business with the Company.

The business partners included in the chain of supply having relations with the Company and other business partners are also expected to act sensitively in the aforementioned matters.

4

CONFLICT OF INTERESTS



4. Conflict of Interests

Our employees and other stakeholders avoid all and any activities which may result in a conflict of interests, and take care of protection of interests of the Company during performance of their job duties, and refrain from all kinds of behaviors and activities which may derive benefits for themselves or their relatives.

The employees must be able to separate their personal interests from the interests of the Company.

Company employees having relations with the all internal and external stakeholders are also expected to refrain from behaviors and activities which may give an impression of present or future conflict of their interests with the interests of the Company. The employees must at all times avoid even an image of irregularity or corruption.

The business contracts and arrangements must at all times be entered into on the basis of objective criteria such as quality, price, technical specifications and reliability of the relevant business partner/supplier, etc., and the decisions to continue must also rely upon such principles. The commercial decisions, suggestions or recommendations of the employees relating to the Company must not be affected from their private interests and/or relations and must not rely upon incentives providing tangible or intangible benefits.

In the case of a potential conflict of interests, the Company's [Internal Audit and Ethical Compliance Department](#) or [Legal Department](#) must be consulted.

The employees must not accept, solicit, offer or give any personal benefits or interests in consideration of their works and activities conducted in the name of the Company.

This prohibition on acceptance or provision of benefits or interests applies not only on interests directly related to money, but also on other interests, rights or benefits (for instance, invitations and gifts) which may cast a shadow on impartiality of the employee. That is why all monetary or non-monetary benefits and interests beyond normal reasonable commercial practices must absolutely be refused.

Only gifts of a symbolic value and/or promotional gifts which may be given occasionally or in religious and official holidays may generally be accepted. The Company employees are required to report such symbolic and/or promotional gifts to the Company's Human Resources Department.

Other gifts will be reported to the [Internal Audit and Ethical Compliance Department](#), and thereupon, in line with the decisions of the [Ethics Committee](#), will be returned to the giver, or may be retained by the acceptor, or will be donated to given associations and societies.

The same rule applies on business lunches or dinners which serve a legitimate purpose related to business and are handled within a reasonable or ethics framework, such as lunches or dinners during or after a business meeting. All employees must consider and think whether an interest, right or object given or taken by them is reasonable or ethics framework or not. In the case of higher values, it should be reported to the Company's [Internal Audit and Ethical Compliance Department](#) for a prior consent of the [Ethics Committee](#).

The Company employees may participate in invitation, representation or entertainment organizations with third party persons or entities within a reasonable or ethics framework. The invitations, representations or entertainments considered to be in excess of reasonable or ethics limits are required to be reported to the Company's [Internal Audit and Ethical Compliance Department](#) for a prior consent of the [Ethics Committee](#). The expenditures incurred by the Company employees for invitation, representation or entertainment organizations with third party persons or entities are periodically audited by the Company's [Internal Audit and Ethical Compliance Department](#).


We win the project and bid tenders not by providing unfair benefits or advantages, but thanks to the strength of our products and services.

Such offers as gifts or invitations may be made to business partners and suppliers only within reasonable limits. Please consult to the Company's [Internal Audit and Ethical Compliance Department](#) about the appropriate and proper behaviors in relation with gifts and invitations.

Gifts, monetary interests or invitations which may breach the applicable laws or may cast a shadow upon their impartiality should not even be offered to civil servants and other agents or representatives of public entities.

Please at all times abide by the limitations and conditions imposed by the Company about acceptance of gifts or interests from persons or entities who do or wish to do business with the Company.

To establish social relations with suppliers and business partners may help you in building a good business relationship with them, but do not forget that there are some limitations on the acceptable entertainment activities or social activities. Always keep in your mind that you have to behave in the best interests of the Company and to protect its reputation. Social relations and activities with business partners should be appropriate and limited. Such activities and events must be reported to the Company's [Internal Audit and Ethical Compliance Department](#) beforehand.

A large, stylized number '5' composed of light blue geometric shapes, serving as a background for the text on the left side of the image.

IMPLEMENTATION AND SUPERVISION OF OUR ETHICS AND COMPLIANCE RULES



5. Implementation and Supervision of Our Ethics and Compliance Rules

All employees, stakeholders, business partners and suppliers of the Company are liable to know and comply with the Ethics and Compliance rules, and to act accordingly in all of their business-related activities.

Both employees and executives must know, and comply with, the Company policies and guidelines.

Each employee of the Company is required to comply with the Ethics and Compliance rules set forth in this Handbook. The employees are expected to learn and understand these rules. The employees must weigh all of their acts and behaviors in the light of, and must act according to, the principles described in these rules.

Borusan Otomotiv Group does not tolerate any breach of law by its employees.

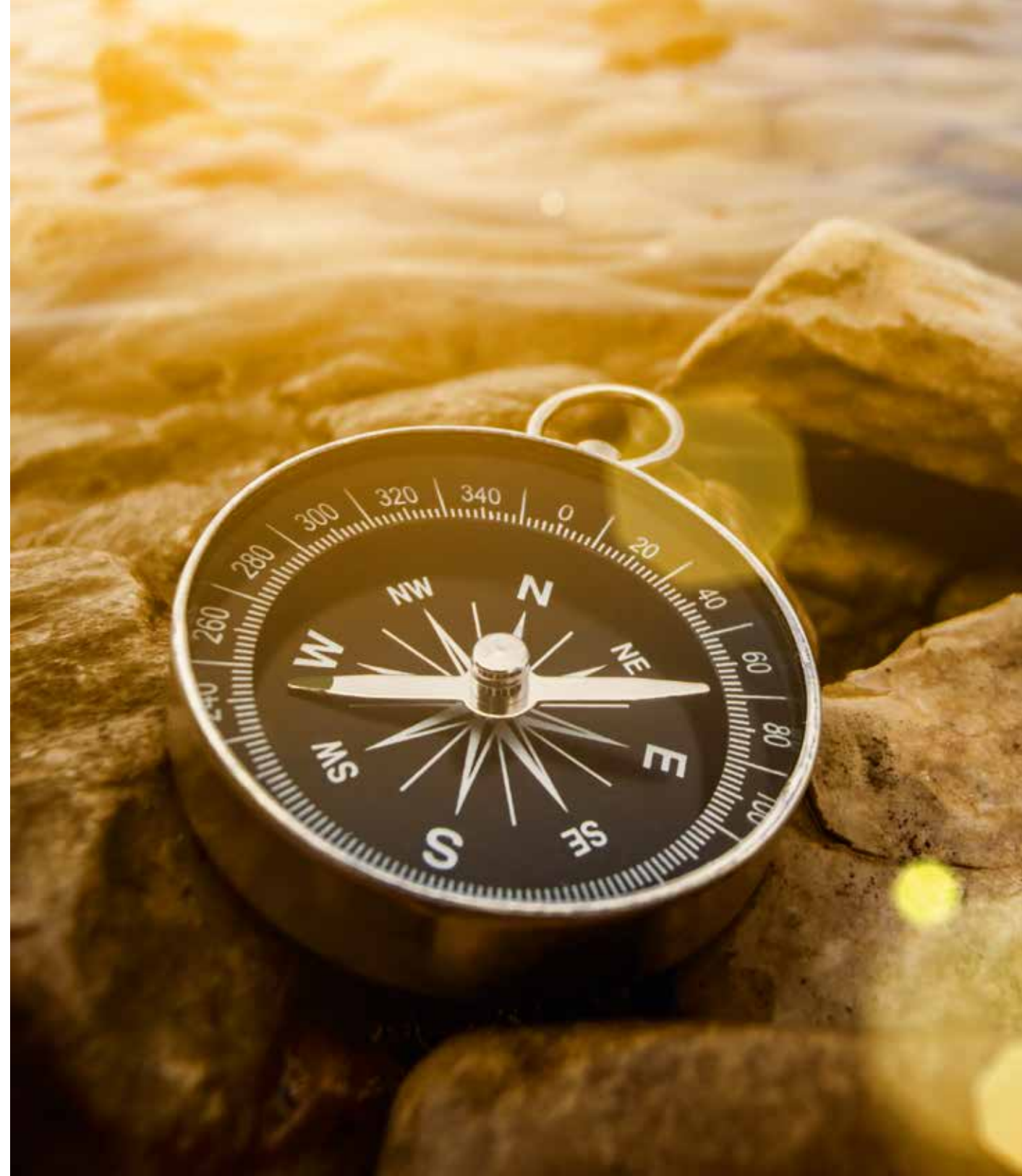
Regulations issued by the Company are binding and mandatory for all employees and executives. Everybody is under obligation to be informed about the regulations applicable on his/her own field of authorization.

In order to create a highly ethical culture and environment in the Company, our employees may assist our Company in four areas:

- To be sure of understanding the ethical rules.
- To reflect the ethical rules onto daily life and affairs.
- To try to do the “right” thing at all times.
- If not sure of what to do in a specific matter, not to be scared of asking.

The culpable breaches of law of the employees during performance of their job duties may result in various sanctions and even termination of employment contract.

Borusan Otomotiv Group **Ethics Committee** manages and monitors the activities and initiatives required to ensure compliance with these rules. Included among these activities and initiatives are training, information and communication measures, and follow-up of breaches of law, and implementation of compliance conditions. The **Ethics Committee** presents regular reports to the Board of Directors about its investigations, detected breaches of law, applied sanctions, preventive actions and measures taken by the relevant departments, and other compliance problems.



COMPOSITION OF ETHICS COMMITTEE

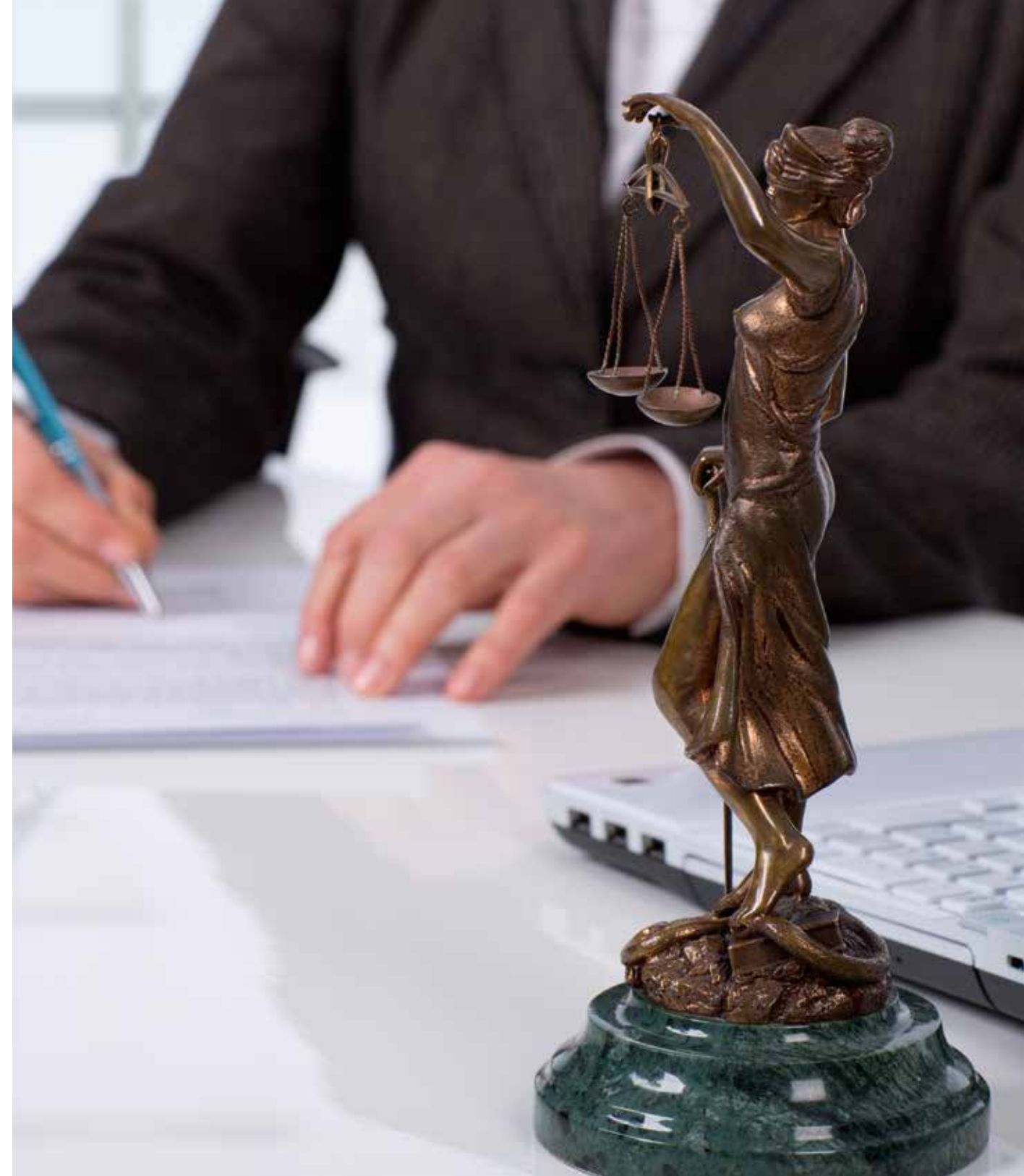


6. Composition of Ethical Compliance Committee

The **Ethics Committee** is responsible for investigation and resolution of complaints and reports as to breach of ethical rules. The **Ethics Committee** conducts its activities over reports submitted to it by the **Internal Audit and Ethical Compliance Department** for four times a year. Furthermore, the **Ethics Committee** meets upon a demand of the Company's Top Management or **Internal Audit and Ethical Compliance Department** as well.

Borusan Otomotiv **Ethics Committee** is composed of the following positions:

- A member of the Board of Directors
- Internal Audit Manager
- Legal Affairs Manager
- Independent member



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**HOW SHOULD WE ASSESS AND
SHARE OUR FEARS AND CONCERNS?**



7. How Should We Assess And Share Our Fears And Concerns?

The Company's employees, stakeholders, business partners and their personnel, as well as suppliers are responsible for compliance with the rules and standards specified in this Handbook.

Whenever you witness or observe a behavior which may be classified as a breach of our rules or which concerns you, immediately report it to the **Internal Audit and Ethical Compliance Department**. By doing so, you will have enabled the Company to take care of the problem and to correct or remedy it before it becomes a breach of law or a risk or threat towards the reputation of the Company. Otherwise, you may be take in if undisered and negative situations happen.

7.1. Assess Your Acts and Ask For Help

If you have doubt about a behavior, ask the following questions to yourself:

- Are the behaviors consistent and in conformity with the ethical rules and the Company's policies and procedures?
- Is the behavior ethical?
- Does the behavior comply with the applicable laws and regulations?
- Does the behavior reflect me and the Company accurately and correctly?

If your answer to any one of these questions is "No", don't do it.

If you are still unsure and your question or concern is ongoing, please call the following **Borusan Otomotiv Group Ethical Line**.

Internal Audit and Ethical Compliance Department Contact Information:

Telephone Number : (+90) 212 412 70 70
Fax Number : (+90) 212 412 70 71
E-mail Address : etik@borusanotomotiv.com
Address : Borusan Otomotiv Group Internal Audit and Ethical
Compliance Department
Firuzköy Bulvarı No: 21
34320 Avcılar - İstanbul / Türkiye

* Legal entity/natural person information of Borusan Otomotiv Group employees reporting an event to the **Internal Audit and Ethical Compliance Department** is kept confidential, and investigations are conducted independently by the **Internal Audit and Ethical Compliance Department** in confidence.

Definitions

Ethics Committee: Composed of top echelon executives and managers believed to be objective, impartial and independent in the Company. It evaluates, and takes decisions on, the events reported by the Internal Audit and Ethical Compliance Department with respect to business ethics and compliance principles.

Internal Audit and Ethical Compliance Department: The Department in charge of implementation and protection of the principles set forth in this Handbook accurately, appropriately and completely. In the case of breach of these principles, this Department reports the breach to the Ethics Committee in certain periods.

Internal Audit and Ethical Compliance Department Manager: The first person responsible for monitoring and management of Ethical Rules in the Company. The manager in charge of the Internal Audit and Ethical Compliance Department.

Internal Audit and Ethical Compliance Officer: The responsible person, reporting to the Internal Audit and Ethical Compliance Department Manager, and conducting fieldworks with respect to the rules set forth in this Handbook, and making a preliminary assessment of questions, concerns and notices submitted via the ethics line, and reporting the results of the Internal Audit Ethical Compliance Department Manager.

References

- International and National Laws and Regulations
- UN Global Compact
- International Financial Reporting Standards
- Law on Protection of Competition
- Occupational Health and Job Safety Law no. 6331
- Environment Law no. 2872
- Motor Vehicles Communiqué no. 2005/4
- BMW Group Legal Compliance Code
- Handbook of Borusan's Ethics Code
- Borusan Otomotiv Management Information and Quality Systems Information Security Policy
- Borusan Holding “Principles of Giving and Accepting Gifts”
- Borusan Holding Implementation Principles on Second Job

Borusan Otomotiv Group

Internal Audit and Ethical Compliance Department

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