

ETHIC POLICY

Integrity

Integrity is essential in all internal and external relations and processes of the Company.

Confidentiality

Everyone working within ALDEM organisation is aware of the privacy of confidential information regarding affiliated companies, related persons and enterprises and other employees and must keep them confidential. Such information shall be used solely for professional purposes necessitated by the job and duty in question and in compliance with laws and regulations and shared only with authorised persons. This obligation continues even after the employee has left ALDEM.

Conflict of Interest

Situations where interests of the individual and those of ALDEM and related persons and enterprises are in conflict are monitored and prevented. While ALDEM employees undertake their duties, they hold the self-interest of the organisation above all else and avoid any action and behaviour that may be construed as having been undertaken in order to gain benefit for oneself or those close to him/her by way of using the organisation's resources or prestige. ALDEM employees take utmost care not to abuse the enterprise resources and to protect the name and respectability of ALDEM.

Responsibilities

ALDEM takes maximum care to fulfil the following responsibilities towards its customers, employees, shareholders, suppliers and business partners, its competitors, the environment and the society.

Compliance with Laws and Legislation

In all the activities it undertakes, both within the country and abroad, ALDEM acts in compliance with the laws and legislation of the countries it operates in. Information, documents and records concerning these activities are maintained regularly and fully. All reports, presentations, financial tables and footnotes to be disclosed to the public and submitted to the authorities are prepared in compliance with laws and legislation and Company By-Laws meticulously, accurately and transparently.

Towards Customers

While they undertake their duties, ALDEM employees are aware that they need to meet customer expectations and that they need to satisfy customers with the quality of their work. In this framework, they are honest and fair in their relations with customers. In their relations with customers they strive to understand the customers' needs, adhering to principles of honesty and truthfulness in a professional manner and act sincerely, enthusiastically and respectfully towards them in order to help them.

Towards Employees

ALDEM acts impartially, without prejudice and fairly to its employees and takes necessary care to enable its employees to work in a healthy, safe and productive work environment. All employees are provided equal opportunity in recruitment and career development regardless of race, religion, position and title. Care is taken to provide the necessary opportunities to employees for self development in order to make a positive contribution to their performance. Care is taken to provide fully and in a timely manner the statutory rights of employees based on the legislation they are subjected to.

Towards Shareholders

In the activities of ALDEM, the aim is to increase ALDEM value. Care is taken to maintain an optimum balance between profitability and risk management. ALDEM activities are carried out within the framework of transparency, accountability, sustainability and integrity. By taking these into consideration, the responsibility of disclosure to shareholders within the framework of laws and legislation is fulfilled. ALDEM resources are used efficiently and effectively and waste is avoided. An effort is made to strike a balance between long term and short term success.

Towards Suppliers and Business Partners

ALDEM acts fairly, respectfully and by adhering to rules of goodwill towards individuals and enterprises with which it does business and fulfils its legal obligations towards them.

Towards Competitors

ALDEM is meticulous in its stance concerning the progress and development of the sector it operates in, seeking common interests along with all other companies working within the sector and a continuation of the trust placed in the sector. It avoids unfair competition with competitors and acts ethically by adhering to principles of fair competition.

Towards the Environment and Society

While undertaking its activities, ALDEM acts with social benefit and environmental awareness in mind and aims to achieve high standards regarding environmental awareness. Violations of environmental rules that may harm the health and rights of customers and other people living in its area of operations are avoided. Care is taken to minimise the adverse impact of its activities on the environment in all lines of operations and measures to prevent environmental pollution are taken. Consumption of natural resources is kept at a minimum. Within the framework of social responsibility, charity work, work to increase environmental and social awareness, activities for the benefit of the public and cultural and social responsibility projects are supported. ALDEM is sensitive regarding the traditions and culture of the countries it operates in and avoids initiatives that would have an adverse impact on the social environment.