

ETHICAL PRINCIPLES OF OTOKAR

Otokar has pledged to adopt attitudes and behaviors conforming to the Ethical Principles of Otokar detailed below toward the persons and entities with whom it has business relations at home and abroad, the community surrounding it, its customers, suppliers and partners, to abide by the criteria set out in the Global Compact of Koç Holding, and to widespread all these principles and exert effort for their adoption mainly in its sector in its business activities and relations.

HONESTY

1. Otokar exerts effort to attain the product standards expected by its customers. It refrains from causing loss or damage to others intentionally through its activities, products and services.
2. Otokar abides by the promises and agreements it has made regarding the products it supplied to its customers.
3. Otokar refrains from unauthorized use of any patent, copyright, trade secrets, trademarks, software programs or other intellectual and industrial property rights directly or through other companies.
4. Otokar does not enter into any agreement with its competitors or other persons or entities which restrict the freedom of trade, such as price setting agreements.
5. Otokar has adopted the principle of "struggling against all non-ethical acts, including threat and bribery" set out in the Global Compact.
6. Otokar refrains from deceiving behavior by giving misleading information about its and others' commercial and financial situations.
7. Otokar refrains from using belittling, mocking and offending statements about other persons, entities and products.
8. It is important for Otokar that its business partners refrain from acts that blemish the image and respectability of Otokar and give importance to the proven business values of Otokar.
9. The principles adopted regarding carrying out of the relations with public or private persons and entities who are doing or intend to do business with Otokar or regarding handling of any potential conflict of interest are as follows:
10. No gift or favor may be demanded.
 - (a) Except for any social convenience or sales promotion which has a low value and does not give the impression of a practice of corruption, no gift or favor may be accepted.
 - (b) No discount or benefit which has not been usually offered for a product or service may be accepted or given.
 - (c) Employees may not accept cash money, gift check or precious metal as gift.
 - (d) Money may not be borrowed from banks and financial institutions, unless conditions of lending are applicable to everybody.
 - (e) No support is accepted from any person or entity for leisure, training and entertainment activities of Otokar without prior content of the Human Resources.
 - (f) Employees may not give gifts on the name of Otokar to other employees of Otokar or their families.
 - (g) Employees may not give support and benefit to any activity, society, person or entity on the name and behalf of Otokar without prior consent of the Human Resources.

11. Employees use the fixtures, tools and equipment of the company for their intended purpose and refrain from wasting them. Employees may not use the facilities of Otokar for their private works.

RESPECT FOR THE LAW

1. Otokar acts in comply with the rules of law in all its activities.
2. Otokar checks and makes the necessary tracking that the ongoing services purchased from other entities are rendered in comply with the law.
3. Otokar targets to fulfill its tax obligations and other legal obligations in full on a timely manner and to be an example to the community in this regard.
4. Otokar refrains from any illegal or criminal activity. It does not resort to any means and methods in the conduct of its business which are not in comply with the ethical and moral values of the business world and the society.
5. Otokar never makes donations in any form to political parties, politicians or political candidates.
6. Except for the persons named in the circular of authorized signatories, no employee may act or communicate so as to represent the company to third persons, unless he or she has been specifically authorized by his or her superior.

WORKING ENVIRONMENT AND EMPLOYEES

1. Otokar has adopted the following principles within the framework of the principle of "Human Rights" set out in the Global Compact:
 - (a) Giving support or showing respect for the protection of the universal human rights within its areas of influence
 - (b) Ensuring that none of its entities has involved in any human rights violation
2. Otokar has adopted the following principles with the framework of the principle of "Working" set out in the Global Compact:
 - (a) Recognizing actively the freedom of organization and the right to collective labor agreement
 - (b) Preventing getting people work under compulsion and pressure
 - (c) Preventing the child labor effectively
 - (d) Preventing discrimination in recruitment and work processes
3. Otokar fulfills its legal obligations toward its all employees and consults with experts on matters not clearly addressed by the legislation.
4. In cases where the laws are deemed inadequate, Otokar observes the rights of its employees.
5. Employees are obliged to know the Corporate Policy and the legislation in effect concerning their tasks and to act accordingly.
6. Otokar refrains from intervening with the private information and private life of its employees and keeps information about its employees confidential at all times.
7. Otokar provides training to ensure job and personal development of its employees.
8. In the recruitment, promotion and appointment of its employees, Otokar takes into account the fitness of the qualifications of the employees for the intended job as a measure and observes the equality of opportunity among the employees.
9. In its practices toward the employees, Otokar refrains from making discrimination among its employees based on sex, age, disability, race and religion. Any employee who has adopted a discriminatory attitude toward any employee or visitor is to be punished.

10. Otokar provides healthy and safe working conditions at a level required by the laws and the circumstances and exert effort to improve such conditions to the extent that the means it has allow.
11. Otokar keeps the private information of the employees obtained from various sources, such as information about the health condition, economic condition, etc., confidential and does not disclose such information to others.
12. At the times of economic crises and when layoffs are compulsory, Otokar acts with the awareness of social and moral responsibility.
13. Employees perform the jobs assigned to them with maximum care and diligence with the aim of getting the work done more quality, faster and more economic.
14. Employees avoid any act and behavior that may mar the image and respectability of the company and do not deviate from the generally accepted clothing style or conduct or from the guidelines established by the company in this regard.
15. Employees are not insensitive and unresponsive to any event which affects the interest of the company and report such events to the concerned departments.
16. Employees may not act both in the conduct of their jobs and in their private life so as to mar the reputation of the Company in the public or to cause a legal difficulty for the Company.
17. Corporate workshops are held where the recommendations, opinions and complaints of the employees are heard.

ACQUISITION, USE AND PROTECTION OF THE INFORMATION

1. Otokar gives accurate and complete information about itself and its activities to the public and the concerned social stakeholders in accordance with its Information Disclosure Policy.
2. Otokar does not disclose the private information of the persons and entities providing services to it to any third persons and entities.
3. Giving importance to the customer satisfaction, Otokar directs all customer complaints received by the employees to the After-Sale Services immediately.
4. Employees do not leak any confidential and private information, particularly the financial and engineering information, that have come to their knowledge by virtue of their positions or of the job handled by them, to any recipient outside the Company and do not give interview and statement to the press and the mass media without prior consent of the management.
5. Employees do not share any private information about any employee of the Company that has come to their knowledge in the course of performance of a job with any person who is irrelevant with that job.
6. Employees keep the trade secrets of the Company confidential and observe the obligations of confidentiality even after their employment at the Company has terminated.
7. All documents, including handwritings, notes, computer files and electronic mails, are the property of Otokar. All these documents must reflect the truth at all times. Any document no longer needed or valid must be destroyed in accordance with the respective corporate policy or if it must be saved, it must be saved in accordance with the corporate policy and the legislation in effect concerning the saving of such documents.

ENVIRONMENT

1. In addition to its Corporate Social Responsibility Policies, Otokar has adopted the following principles pursuant to the principle of "Environment" set out in the Global Compact:
 - (a) Supporting the preemptive action regarding the issues concerning the environment before a loss or damage has occurred
 - (b) Taking action with a view to spreading the sense of more effective responsibility toward the environment
 - (c) Taking action for development and spreading of environmental friendly technologies
2. In its activities, Otokar gives due care and diligence to prevention of loss or damage to the nature and historical artifacts and to acting in conformity with the customs, traditions and habits of the community and the laws in effect in this regard.