

BEYCELİK GESTAMP BUSINESS CODE OF ETHICS

EFFECTIVENESS

Business Code of Ethics of Beycelik Gestamp Otomotiv A.S. (hereinafter “Beycelik Gestamp” or the “Company”) has become effective on August 1st,2017.

OUR VALUES

- We are fair and reliable
- We improve our business, us and environment
- We are open minded and constructive
- We add value to our customers

BUSINESS CODE OF ETHICS

Beycelik Gestamp’s Business Code of Ethics are essential rules established to arrange and regulate inter-company relations, and relations of all employees, customers, suppliers, and their relations with other stakeholders.

1. WORK CULTURE

Integrity, honesty and respect are our priority values in our relations with our employees, clients, suppliers, subcontractors, the entities and organizations we have contacted.

2. CONFIDENTIALITY

- We as Beycelik Gestamp use care in protection of the confidentiality and special information of our customers, employees and the other applicable persons and entities we work with.
- We protect information related to our operations, use such information only for the purposes of our company, and share such information only within the authorities defined.
- Sharing of such commercial and strategic information with the competitors or 3rd parties by the employees and their taking advantage of such act may not be accepted. The employees may not take any information and documents, projects, regulations etc. –we acquired due to our assignments- out, and may not share such with any 3rd parties, as they leave the company.
- Confidential information may not be changed, copied or destroyed. We take the required measures to protect and keep them.

3. COMPLIANCE WITH THE LAWS AND LEGISLATIONS

- We perform all our operations pursuant to the rules and legislations with which we are required to comply. We provide with correct, complete and comprehensible information to legal and regulatory bodies and entities within due time.
- We keep and maintain any and all financial report, financial table and record prepared by our company pursuant to the applicable legislations and pursuant to the national and/ or international accounting principles.

4. CUSTOMER SATISFACTION

- We are respectful to our customers. It establishes trust based relation with them and adopts honesty and fairness principles in our relations.
- We attach importance to the satisfaction of our customers and aim at keeping this satisfaction at the highest level, and providing services at right time and with proper quality in order to ensure our relation sustainable.
- We do not perform any commercial transaction without notifying to or approval of our clients even if such performance would be beneficial to our customer.

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- We do not seek profit by providing incomplete or wrong information to our clients.

5. OUR LIABILITIES AGAINST OUR EMPLOYEES

- We as Beycelik Gestamp do not discriminate our employees based on age, race, gender, belief, language, religion, nationality, marital status, sexual choice, seniority, political belief, military status, and disability status. We apply this principle in all conditions such as hiring, placement, promotion, termination of employment contract, withdrawal, transfer, permit, salary and training.
- We provide with reliable and health working environment for our employees.
- We as Beycelik Gestamp respect the private and family life of all our employees. The personal data of the employees are kept and processes pursuant to the all applicable legislations in particular the Law No 6698 on Protection of Personal Data. We do not disclose private information of the employees to any third parties without the permission and knowledge of the employees, save such disclosure is required as per the applicable legislations.
- The managers having authority in hiring process may not favor their spouses, close relatives or their relatives in hiring process, but conduct personnel selection process as per the existing personnel hiring criteria.
- The information such as salary, social and ancillary rights as well as contract conditions as indications of continuity between the employee and Beycelik Gestamp may not be disclosed to any third parties without permission of the employees.
- We ensure our employees to use their personal rights fully and properly.
- We do not allow any form of harassment including oral and physical harassment at the workplace.

6. RELATIONS WITH OUR SUPPLIERS, SUB-INDUSTRY, COMPETITORS AND PARTNERS

- We decide in selection of our suppliers, dealers, authorized sellers and authorized services dealers pursuant to our company policies. We target to create mutual value in our relations.
- We avoid unfair competition with our competitors, and foster fair competition rules.
- Our employees use legal and ethical resources in collection of data about our competitors.
- We do not exchange information and make negotiations with the competitors to attempt defining the market and/ or competition rules.
- We avoid assuming unnecessary or unmanageable risks with a view to create value for our partners; rather we aim for sustainable growth and profitability.
- In all disclosures we made to our partners, we provide proper, correct, complete and clear information on time about our financial statements, strategies and investments.

7. OCCUPATIONAL HEALTH AND SAFETY, ENVIRONMENT AND SOCIAL RESPONSIBILITY

- We attach importance of occupational health and safety of our employees. To this end, we follow and apply all local laws.
- We notify all incidents causing loss of working days occurred to the legal authorities within due time as per the applicable laws. All records and documents related to the occupational health and safety are submitted to the authorities during the on-site investigations / examinations conducted by the official authorities.
- We use consultants and external trainings for learning and application of the legislations about the occupational health and safety. We increase awareness and consciousness about the occupational health and safety via in-house trainings and audits.
- We extract and dispose all our wastes occurred during our operations as per the applicable legislations.
- We attempt to contribute the society on economic, cultural, environmental and social development subjects.

8. LIABILITIES OF THE EMPLOYEES

- Employees conduct their works as honest, disciplined and self sacrificing.
- The employees are attentive to represent their companies in the best manner at all times and at everywhere.
- The employees respect the laws and company regulations at all times.
- The employees use due care in our relations with the employees and act in order to ensure customer satisfaction at the highest level.
- The employees act prudently and respectfully against each other. They do not use defamatory, insulting or interruptive words and language among them and against 3rd parties.
- Sexual harassment including unwanted sexual approaches, sexual privilege requests and other verbal or physical sexual acts is considered as discrimination and prohibited under the applicable laws. The employees understand such fact and act accordingly.
- The employees may not use statements or make any threats implying, associating or purported to establish any relation between the promotion potential, salary status or employment with their or others' religious or sexual preferences.
- The employees may not use the assets and resources of the company for other purposes and inefficiently, they avoid unnecessary disbursements for the company. This includes effective management of time. The employees may not use their time during the working hours for their personal works.
- They avoid any behavior which may endanger the safety of them or their colleagues.

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- The employees use due care for using proper language in the internal and external communications at all levels, and may not use any act, statement or communication which may bind the company for any commitment unless it will be authorized explicitly.
- The employees may not take any unfair advantage from any individual or entity for any reason whatsoever, and may not give or receive any form of bribery.
- The employees use due care to protect and maintain all tangible and intangible assets of the company including information and IT systems of the company; they protect them against any possible losses, damages, misuse, fraud, theft and sabotages.
- They do not use the working hours and the company resources directly or indirectly for the personal benefits and/ or any political activities.
- The employees do not give or receive any gift with high monetary value to/ from the companies with which they have relations, which may affect the objectivity of the other party, cause or be considered as establishing any unfair dependence. In the event of any doubt for any incident related to this provision, the view of the Human Resources Director is taken. They do not accept any discount, donation, money, check, goods or property, free holiday, special discount etc. from the holding companies or third parties, which may be considered as improper or unfair.
- No payment may be accepted in consideration of attendance to any seminar or similar other organizations to represent Beycelik Gestamp or any of the companies of the Holding. However, symbolic prizes, plates, certificates etc. which have no monetary value may be accepted.
- The employees may not use the power and/ or name of the company or their positions in the companies, to seize personal benefits for them or 3rd parties. They may not conduct any business activity based on financial benefits excluding the group Companies.
- Where any of the employees will intend to conduct any activity in any political party, such activity should not cause any conflict of interest with his/ her position in his/ her company. The applicable employee may not use the name, position and company resources during these operations.
- The employees may not manage any company directly or indirectly and may not work for any person and/ or entity in consideration of any fee and similar other earnings during or outside the working hours.
- The employees are allowed to work for non-profitable organizations and universities and for social responsibility and charity purposes missions, with the written approval of the General Manager, as long as such activities will not cause any interruption in their works for the company.
- The employees may only write articles or make speeches by using the name of the company only on the subjects not related to the company and its operations and the subjects not conflicting with the policies of the company, subject to prior approval of the General Manager.
- They may not give and press release or information to the press entities unless it is authorized by the senior management.

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9. INTERNAL CONTROLS AND PROPER REPORTING

- All financial reports, accounting records, research reports, sales reports, expense accounts, business schedules, and other documents of Beycelik Gestamp are required to be true and correct. No fake, misleading, wrong, deceptive, misguided or incomplete record, entrance or document is allowed.
- Non-conformant / improper accounting transactions and documents and financial reports with any falsification do not cause only violation of the policies of Beycelik Gestamp but also may cause violation / breach under the applicable laws and regulations. Any form of such breaches/ violations may not be accepted.

10. APPLICATION

Compliance with this Business Code of Ethics are under the liability of all employees and managers supposed to be acting as guidance for compliance with these codes.

Any violation of any of provisions of the Business Code of Ethics shall be subject to number of discipline penalties which may include discharge of the applicable employee from the company. Such discipline penalties shall also be applied on those approving such improper acts or not employing the applicable procedure after such acts known to them.

In the event of any doubt whether any act is to be considered as a breach as per this Business Code of Ethics, it is required to apply the Immediate Superior Officer and /or Human Resources Director and/ or Ethic Board in written. The notices by the employees of Beycelik Gestamp or third parties to the Ethics Committee are kept as confidential. Any investigation or audit related to such notices shall be executed in strict confidence as per the Working Principles of Ethics Committee.

Members of the Ethics Committee:

Ethics Committee directly reporting to the Beyçelik Holding's Vice Chairman of the Board. Committee consists of the following persons.

President	Beyçelik Holding S.A / Chief Finance Officer
Member	Beyçelik Holding S.A. / Organizational Development Manager
Member	Beyçelik Holding S.A / Internal Audit Manager
Member	Beyçelik Gestamp Otomotiv San. S.A. HR and Corporate Communications Director
Member	Warmhaus Isıtma ve Soğutma Sistemleri San. Tic. S.A. Plant Director

Use the following e-mail addresses for sending written notices

e-mail:etik@beycelik.com.tr

Mail: Attention to: **Ethics Committee**
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