

COMPLIANCE

**ARÇELİK PAZARLAMA A.Ş.
AUTHORIZED SERVICE
POLICY**

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1. INTRODUCTION

In line with its vision of “Respecting the World, Respected Worldwide”, Arçelik aims to ensure the satisfaction of its customers, to provide products and services of universal quality and standards using limited natural resourced effectively, and to contribute to economic and social development.

By this means, it aims to be symbol of trust, continuity and respect for its customers, shareholders, employees, suppliers, dealers and authorized services- in short, all stakeholders- nationally and globally.

Arçelik is among the first companies signing the Code of Conduct published by the Home Appliance Europe (APPLiA). Arçelik is also part of the Koç Group, which signed the United Nations Global Compact. This convention consists of 10 principles determined on human rights, labour, environment and anticorruption matters.

With this Policy, Arçelik commits that its authorized services act in accordance with the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Universal Declaration of Human Rights and the United Nations Global Compact.

In line with its strong values, transparent policies and standards, Arçelik always expects from its employees and business partners to act in accordance with high ethical values and compliant with all relevant laws and regulations in the countries they operate. This Policy sets out the ethical and legal standards that the authorized services¹ of Arçelik Pazarlama A.Ş., a subsidiary of Arçelik, must comply with.

It is a contractual obligation that authorized services accept and comply with this Policy within the scope of Article 18 of the Arçelik Pazarlama A.Ş. Authorized Service Agreement signed between Arçelik Pazarlama A.Ş. and its authorized services. In case of violation of this Policy, Arçelik Pazarlama A.Ş. reserves the right to terminate the authorized service contract.

2. PURPOSE, SCOPE AND BASES

This Policy is designed to ensure that authorized services' business practices are aligned with Arçelik values, applicable laws and regulations and must be complied by all authorized services.

Candidates who want to become Arçelik Pazarlama A.Ş.'s authorized service, are also evaluated from the perspective of the Authorized Service Policy. Within the scope of this policy, If Arçelik deems it necessary, it has the right to inspect the authorized services onsite.

The program of this Policy has three operational pillars:

- **Prevention-** authorized service works to embed a culture of integrity at all levels, in all locations where it has operations.
- **Detection-** authorized service employees are encouraged to speak up and give voice to Arçelik values.
- **Response-** Arçelik Pazarlama A.Ş. has the necessary infrastructure to duly investigate violations. If necessary, Arçelik handles confirmed breaches with a standard, fair and uniform approach, and uses what it has learnt to continuously improve itself.

Arçelik conducts its operations with honesty and with respect for the human rights and by protecting the interests of its employees and expects the authorized services to adopt these rules and act in accordance with them.

¹ Arçelik authorized services will be referred to as authorized service.

This Policy, in addition to establishing a standard of conduct, includes rules on fighting against corruption, ensures that authorized services' employees work in esteemed working environments, sets forth standards for the protection of information and data, and give guidance for the behaviour model expected in external relations.

This Policy may not answer every specific question and problem. If specific situations are not expressly covered, the purpose of this Policy must be upheld by exercising common sense and good judgement in light of the objective criteria.

3. AUTHORIZED SERVICES- BUSINESS PRACTICE

3.1 Compliance with the Law

Authorized services must comply with the relevant laws and regulations (processing and protection of personal data, fighting against corruption, competition, environment, occupational health and safety, intellectual property rights etc.) and with the scope of the contract arrangements established within the scope of current contractual relationship with Arçelik Pazarlama A.Ş.

Authorized services must act in compliance with the applicable labor law regarding working hours and rights of annual leave. Wages paid to authorized services employees, overtime and wage-based rights must comply with the applicable labor laws.

3.2 Employees

Authorized services take measures to protect and promote diversities and commit to create working environments where there is equal opportunity, mutual trust, respect for human rights without discrimination.

Authorized services take necessary measures for the health, safety and security of their employees. Authorized services recruit their employees only based on their qualifications and abilities and put necessary effort for their development. Any form of forced, compulsory, trafficked or child labour incompliant with relevant legislation at authorized services are never tolerated.

Zero tolerance is shown towards the violation of authorized services employees' privacy in any form of physical, sexual, psychological and/or emotional harassment in the workplace or anywhere they present due to work.

Authorized services respect their employees' right to unionization and their decision to become a union member, their right to organize and collective bargaining in accordance with the law.

3.3. Human Rights

Authorized services protect and respect the human rights, human dignity and privacy of the communities they influence through their business activities. Authorized services also ensure that they will carry out their all commercial activities without resorting to violence or abuse, that they will refrain from, and will not allow, being involved in any crime in relation to human rights violations.

3.4. Consumers

Authorized services adopt an understanding towards all our consumers that is satisfaction-oriented, addressing their needs and expectations in a correct manner within the shortest time possible.

Authorized services treat the customers respectfully, fair and in line with the rules of courtesy. They take complaints from the customers seriously and provide solutions thereto. Authorized services will accurately and properly advertise products in accordance with the relevant laws and regulations. Authorized service employees have enough technical knowledge of the products and transmit this information to the consumers in an honest, clear and transparent manner.

3.5 Relations with Political Parties

Arçelik neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote political party interests. If our authorized services have any existing political activities, they should continue these activities in a way that will be completely separate from the Arçelik brands.

3.6 Environment

Within the framework of our vision of “Respecting the World, Respected the Worldwide”, Arçelik commits to ensure continuous improvement of our environmental management system, and the protection of the environment to increase our environmental performance in all our processes in line with the principles of sustainable development and circular economy by the relevant national and international legal laws and regulations.

Accordingly, authorized services are expected to operate in compliance with environmental regulations and the above commitments and in accordance with the special conditions determined by Arçelik Pazarlama A.Ş.

3.7 Competition Law

We, as Arçelik Pazarlama A.Ş., encourage fair competition and support the development of competition law while carrying our activities. In this context, all of our authorized services must act in accordance with the competition law. Otherwise, a violation of Competition Law may result in extremely severe sanctions being imposed against both companies and employees.

While Arçelik authorized services strongly protect their own legal interests, they act in full cooperation with the competition authorities.

3.8 Fighting against Bribery and Corruption

Authorized services do not engage in any inappropriate conduct, such as receiving or giving bribes or other improper advantages for business and financial gain. No authorized service employee may offer, give or receive a gift or payment that may possibly be perceived as a bribe. Corruption, embezzlement, any kind of facilitation payments or bribery, regardless of their type or manner of occurrence, have no place in business practices of authorized services.

All accounting records and supporting documents of the authorized services must accurately and clearly describe and reflect the nature of underlying transactions. There should be no undisclosed, or unrecorded accounts, fund or assets established or maintained in the financial systems of the authorized services.

3.9 Managing Conflicts of Interests

Authorized service employees must avoid situations where their personal interests conflict with the interests of the authorized services for which they work. Authorized services and their employees take necessary measures to ensure that their relationships with Arçelik do not conflict with their personal interests and the responsibilities of the authorized services to Arçelik within the rules specified by Arçelik.

3.10 Gifts and Hospitality

Under certain circumstances exchanging gifts and hospitality are acceptable to increase the strength or maintain business relationships among business associates.

Authorized services must not receive or give any gifts that would constitute incompatibility with the law other than commercial tradition and promotional materials and must avoid hospitality activities that go beyond its purpose.

3.11 Trade Restrictions

Authorized services follow laws on trade restrictions, export controls, embargo, boycott, anti-corruption and customs laws regarding their activities when necessary, and commits to act in compliance with such laws and regulations.

3.12 Protection of Information

All kinds of information, which are not publicly available or are not made publicly available by Arçelik Pazarlama A.Ş. are considered confidential including, but not limited to technical, operational, financial information.

Confidential information is protected by company policies and applicable laws in countries we operate. Authorized services strictly adhere to company policies and procedures to protect confidential information and do not share confidential information with third parties.

Authorized services must create, record and retain all business-related information accurately and in full compliance with requirements of applicable laws. They also process the personal information of its employees, business partners and customers in order to improve company processes and activities to the extent permitted by legislation. They do not share this personal data with third parties without the consent of the data owners.

3.13 Intellectual Property Rights

Arçelik Pazarlama A.Ş. does not give license, patent, industrial design or copyrights to its authorized services. The related authorized services are obliged to pay all costs, losses and additional costs including penalties of the parties (Arçelik Pazarlama A.Ş., other suppliers and consumers) if the damage is authorized service rooted due to intellectual and industrial rights violations.

3.14 Occupational Health and Safety

Expectations from authorized services for Occupational Health and Safety (OHS) are as follows;

- Comply with the legal regulations related to OHS and the requirements determined by Arçelik,
- Determine the organization, roles and responsibilities and share them with their employees,
- Make or ask a third party to make OHS risk assessments and prevent possible workrelated accidents and occupational diseases by taking necessary precautions,
- Ensure making control, measurement, examination and research for identification of OHS risks,

- Provide resources, tools and equipment for OHS-related studies, and have periodic maintenance and control,
- Create a safe and healthy working environment for employees, trainees, visitors and special risk groups and ensure that they are kept under health surveillance,
- Conduct the necessary measurements, tests and analyses at the workplace,
- Increase OHS awareness by training and informing employees in accordance with the legislation,
- Receive employees' opinions and suggestions and support their participation,
- Carry out emergency preparedness and response actions continuously,
- Monitor and audit whether OHS measures are taken or not and eliminate any noncompliance on these measures.

4. IMPLEMENTATION PRINCIPLES

In the audits conducted to Arçelik authorized services, their compliance with the rules in this Policy is questioned, non-conformities are expected to be improved by initiating corrective and preventive actions, and improvements are checked by follow-up audits.

Arçelik Pazarlama A.Ş. may request removal of an employee of any of its authorized service, who acts against the relevant laws and regulations or who violates these rules, or the Company may terminate the contract with the relevant authorized service.

The following reporting channels can be used to report suspicious behaviour contrary to this Policy or violation of the rules in this Policy.

Web: www.ethicsline.net **E-mail:** arcelikas@ethicsline.net **Phone:** 0850 281 61 18

Arçelik ensures that all investigations will be handled with absolute confidentiality and whistleblowers will be protected. Arçelik will protect the confidentiality of the individual who has requested a suggestion in good faith or reported suspicious behaviour of the authorized service in compliance to this Policy or possible violation of business ethics and Arçelik will not tolerate any retaliation against that individual.

If this Policy is revised by Arçelik, authorized services undertake to accept the revised Policy and commits to adapt Global Code of Conduct and related Code Policies and comply with the principles specified herein.