



Values and Code of Ethics of Gözen Security

To make the right decisions while doing our business...

Fair approach, transparent professional relation...

GÖZEN
SECURITY

Foreword

Dear Colleagues,

Gözen Güvenlik Hizmetleri ve Ticaret A.Ş. has been built on the core values which have guided us since the establishment of our company and now continue guiding us. Our values have shaped our culture supporting our reputation.

We all take part in the creation of the general image of our company with our individual decisions taken during our daily business and our activities. Our number of projects, customers, different assignment points increase every passing day and our company continuously grows. As our business volume and the surrounding world increase and get complicated, some situations occur where the right choice is not simple and clear. The decisions taken in such situations should comply with our business ethics rules, current policies and procedures, shared moral principles and values.

We have passed down these values for years. However, as our existence in the locations increasing in number every passing day increases, we now believe that it is the right time to collect our values in a single document which will both inspire us and make us come closer.

We live in a rapidly changing time. Now it is not enough to share only the common views. Additionally, we should be able to clearly express how we can actualize our responsibilities through a new document. This document brings our values into life and shows how they be an inspiration to our decisions taken during our daily business and how they reveal them.

It is our responsibility to comply with these rules of conduct which direct the honesty and ethical standards of Gözen. We believe in each and all of you to observe and transfer these rules. We believe more than ever that our commitment to these strong values and introduction of high ethical standards will ensure that Gözen Güvenlik Hizmetleri ve Ticaret A.Ş. is seen as an exemplary organization which arouses confidence and respect. We have absolute confidence in you that you will duly fulfill your responsibilities.

Regards,

Cem BOZYİĞİT
General Manager

General Principles

Observance of the laws, protection of high ethical values and the defence of our common values play a big role in all activities of **Gözen Güvenlik Hizmetleri ve Ticaret A.Ş.** and form the basis of the faith of our customers, employees and other stakeholders in our company. These principles also play an essential role in the maintenance of the strong value of the brand “Gözen” and the support of the long-term sustainability and the growth of our activities.

The Code of Ethics consists of a number of core principles and implementations for dealing with the subjects related to the ethics. Code also makes available the accessible sources which may be used by everyone.

Values and Code of Ethics of Gözen Güvenlik Hizmetleri ve Ticaret A.Ş. are among the primary company policies of Gözen Security, and define the core principles which are expected to be observed by all employees and business partners of Gözen at all times. Code of Ethics is closely associated with Gözen policies and other guidance documents and should be read accordingly.

Understanding and complying with the Code of Ethics is the responsibility of the company and all employees of the company as a company instrument. All employees and business partners are encouraged to report any breach and expected to report such situations with the assurance that there will not be any sanction or any other negative result for the persons reporting in good faith.

Code of Ethics serves as a guide in many respects regarding the valid standards of honesty and appropriate professional behavior; however, it is impossible for it to regulate every situation which may arise on daily basis during the operations. Thus, Code of Ethics does not remove the responsibility of each employee or the business partner to use his own reasoning for the implementation of the code in accordance with the concrete situation with respect to complying with the spirit, purpose and letter of these principles.

If you believe or have reasonable grounds that any employee or colleague behave or may behave contrary to the laws or company policies, procedures or the code of ethics, you should immediately inform your supervisor. If you have hesitation to report the incident or not, you should always prefer reporting. Thus, you will give the management levels the opportunity to search and examine the potential problems.

Our Core Values and Principles

Our values and principles are located in the centre of everything we do and affect our work everyday and everywhere. They define our approach to our manner of work. They are the reflection of our passion, enthusiasm, responsibility for our work and the pride we take in them.

Our values and principles reflect our opinions regarding what is important in our way of working together and with others outside Gözen Security. We actualize these values in our company, everyday and everywhere, with our behaviors and the results we reach. Our values and principles should be our guide while taking decisions and deciding for our priorities.

- **Honesty and Equity**

We should be honest, fair and reliable, and pay attention to the ethical values. We should adopt as a principle to implement the highest behavior standards in our work.

We should not gain unfair advantage from anybody with manipulation, secretion, misuse of private or other confidential information, misrepresentation about the significant material facts or other unfair acts and behaviors.

We should not only do the work correctly, but also do the correct work.

We should not allow the personal interests or family interests to direct us to do anything conflicting with the interests of Gözen Security.

- **Customer Satisfaction**

It is a part of our company objectives and culture to gain a clear understanding of the needs of our customers, to evaluate and respond them comprehensively and to live customer oriented at all times.

We believe that we can realize our values and reach our targets only by evaluating and responding and meeting the changing needs and expectations of our customers better and faster than our competitors. We should be conscious of the fact that establishment of the targeted long-term relations with our customers and the customer loyalty can be realized by clearly understanding the needs of our customers and with the outstanding products and services offered sticking to the ethical rules.





- **Careful**

Gözen Security employees should endeavor to be careful at all times in order to do the right thing with the aim of protecting the goods and properties of the customers and the values represented by Gözen Security, and have the ability to observe, listen and evaluate.

- **Helpful**

We should be ready to support our colleagues, customers and other persons needing help.

- **Respect for Laws**

As a basic rule, we should always respect the laws of the countries where our company operates while performing our duties as a company and individually.

Gözen especially complies with the letter and spirit of the laws in force:

- Human rights; prevention of the use of child labor and abuse of children; discrimination; working hours and remuneration; collective representation of the workers
- Quality, health and security standards
- Environment
- Corruption and bribery
- Taxation and correct submission of the financial information
- Rightful/Fair competition

Gözen endeavors to share these principles with its business partners and to ensure such partners comply with the said principles as much as possible.

- **Respect for Individual**

Each of us is a keystone of success. It is important to have employees from different cultural environments. There is no discrimination in our company. We should be open to affect and be affected in our relations. Our communication should be open, frequent, sincere and respectful, and we should value and listen to each other.

We should all contribute to the creation of an environment of confidence in Gözen which is respectful of the private lives of the persons, fair, constructive and open to different ideas. We should develop and implement the career plans of our employees with them so as to ensure their personal and professional developments. We should authorize the persons and provide the instruments and appropriate working environment required to help them be successful.

- **Innovativeness**

Innovativeness is the basis of our difference, success, profitability, improvement and leadership. We should approach constructively to new ideas and creativity and encourage and award them. We should also support risk-taking provided that it is evaluated well, and take up the failure which may arise at the end of the risks taken together.

We should find and implement innovations which will make our products, services, ways of working and processes more efficient and productive both for us and our customers. We should move with our customers and use our innovativeness to meet and go beyond their expectations.





● Team Work

We should work together removing the corporate and geographical borders in order to be a successful company and meet the changing needs of our customers. We expect our employees to give all their skills and knowledge to our company both for individual and team work. We should work as a team as much as possible. We should accept all team members as the leaders who are authorized, responsible and capable of leading us in their fields of expertise.

Thanks to team work, we believe that the targets will be shared, the quality and speed of decision-making process will increase, good decisions will be accomplished, experience and good practices will become widespread, team spirit and feeling of achievement will dominate the company, and we will stand out among our competitors becoming a continuously learning company and persons.

● Leadership

We have devoted ourselves to create leadership opportunities at every level. Leaders are the persons who create and share a vision according to the company's targets and step forward to accomplish the difficult targets, direct the persons and make them competent and encourage them, and reveal the individual and team success.

They ensure that each individual uses his/her unique skills and make others focused on the common goals and settle the disputes. Leaders have good relations with all employees in order to share, support the ideas and extend the best practice procedures within the company and Gözen Holding.

● Productivity

We should endeavor to obtain as many results as possible for the company objectives with the available sources. We should continuously work in order to improve our efficiency and productivity. When we devote ourselves to doing anything, we should complete it in the best, most correct and most productive way possible and on time and try to think of ways to do it better next time.

We should measure our performance fairly and carefully, and set clear, realistic, accessible and high targets and evaluate our performance according to these targets. We should be willing to have our performance seen and evaluated by our superiors and other authorities.

We should believe that high performance will get us to the leadership in the fierce competitive environment. We should work with the persons showing outstanding performance and taking initiative and share our success with them.

- **Confidentiality**

It is highly important for our company that you feel safe for conformity with the company policies and ethical rules. For this reason, confidentiality should be our first priority.

- **“Open Door” Policy**

The basic foundation of the efforts to comply with the policies is the transparent, accessible and open discussion platform within Gözen. Many issues may be solved before they become a problem for the company personnel or the public opinion. “Open Door” policy encourages the company personnel to express their ideas and opinions especially the legal and ethical ideas and the ideas on the business quality, concerns and complaints and to ask questions. All directors are obliged to “keep their doors open” to the persons subordinate to them and the other personnel who like to reach them and support this policy.

- **Information Management and Security**

We all have the responsibility to protect and manage the information of Gözen Security correctly. Gözen’s information is critical in terms of our business. All information from e-mails to our meetings, advertisements to marketing assurance is a company asset which we should efficiently protect and manage. Failure to do this may affect our ability of operating efficiently as well as our brands, revenue and reputation.

We should keep our user ID safe, create strong passwords and use the systems responsibly and take reasonable steps in order to prevent unauthorized access to the information under our responsibility and entrusted to us. Besides, we should protect the information assets of Gözen Security against accidental or unauthorized disclosure and classify all non-public information according to their confidentiality.

The information we create and have should be correct, well-organized and easily accessible. We should elaborate to fulfill, change or eliminate correctly the requirements of access to information when people join the company, are replaced or leave.

It is essential to store certain information we collect for certain periods for business purport according to the laws, bilateral agreements and the arrangements made, and such necessities are specified in the storage plans we should follow.



- **Confidential Information and the Information Subject to Intellectual Property**

Unless being subject to a written confidentiality agreement or confidentiality condition, we should not receive any confidential information from a passenger, direct or indirect customer, visitor, supplier or any other person with a condition of keeping the information confidential or with an agreement in this direction.

We should protect the confidential information of the customers, visitors, suppliers and other persons except in the situations ordered otherwise by the laws.

We should not receive the confidential information of any person, including the persons and organizations we compete with, illegally or unethically.

We should also comply with our confidentiality obligation towards our previous employers or the persons we previously had relations.

As the disclosure, knowingly or unknowingly, of the confidential information of Gözen about its business, financial status, legal status may have negative effects on the financial stability and competitive power of our company, we should protect and not disclose the confidential information of our company.

Products, services, ideas, concepts and other information we produce or develop within the daily course of our affairs are valuable assets and subject of intellectual property for our company. Various laws make it possible to protect the said assets. Among the confidential information and the information subject to intellectual property is marketing plans, sales and marketing information, customer and personnel records, research and development information, technical data, production techniques, price information, strategies and new product and service information.

It is for the sake of Gözen's benefits to protect the confidential information and the information subject to intellectual property and to prevent illegal or unauthorized disclosure of them. For this reason, we should be very careful while using telephone, fax, telex devices, electronic mail and other electronic information sending and storage instruments. We should not speak the confidential information in public places where other people can hear it. We should not give any confidential information to a person outside the company without making a written confidentiality agreement in advance. We should give such information only to the relevant persons in the company and to the extent required.





● Confidentiality of Personal Information

Confidentiality principle is a valid principle not only for the commercial information, but also for the personal information of Gözen's current or previous personnel, job applications, consultants, customers and other shareholders. We should protect and keep confidential all such personal information in the company according to the principles below:

- Personal information is collected, processed, stored and transferred after taking the appropriate measures to provide the confidentiality required. We should allow only the persons having legal and lawful reasons to see or learn such information. We should not share the information of the persons sent to Gözen by the persons applying for a job with others without written consent of that person,
- When required, we should receive the consent of the relevant person to collect, process, store and transfer the personal information.

● Privacy Acts

Protection of personal information is a growing global problem. Technologies emerging and rapidly developing in the field of processing, transferring and using the information bring with them new problems threatening the confidentiality or privacy of the personal information. Besides, there are different expectations in different cultures about which information should be protected and what kind of a price may be paid for it.

Ethical and legal solutions play an important role in terms of the conclusion. Therefore, the countries make various laws for the protection of the personal information or strengthen the existing laws. While these laws aim to entitle the persons to control their information and introduce restrictions to the use of the personal information, they also charge the parties violating the confidentiality of the personal information. We should learn and carefully implement such laws in the countries where we perform our duties.



- **Conflict of Interests**

A “conflict of interests” may occur when we put our personal, social, financial or political benefits before the company’s benefits. Giving such an impression may damage our or company’s reputation. We should share any possible conflict of interest we sense immediately with our superior. When we are asked to show that we know and comply with the standards in these ethical rules, we should explain the possible conflicts of interests, if any. It is possible to settle many conflicts of interest simply and in a manner acceptable by the parties. Below are the examples of some conflicts of interests.

- **Personal Investments or Transactions**

Gözen respects our right to direct our investments as we like and does not want to intervene in our personal lives. However, we are responsible for avoiding possible conflicts between our interests and its interests or any situations which may cause such an impression.

Unnecessary details on this subject include a risk such as limiting the field of application of this policy. The examples of the situations which will clearly result in a conflict of interests are listed below:

- If we or any member of our family have substantial shares in a supplier, competitor or customer company,
- If we or any member of our family are interested in a transaction which Gözen is or is known to be possibly interested,
- If we or any member of our family endeavor to derive personal benefit using the company’s corporate opportunities and possibilities, or
- If we or any member of our family receive wage or commission or any other financial gain from a supplier, competitor or customer company.

- **Working at a Second Job**

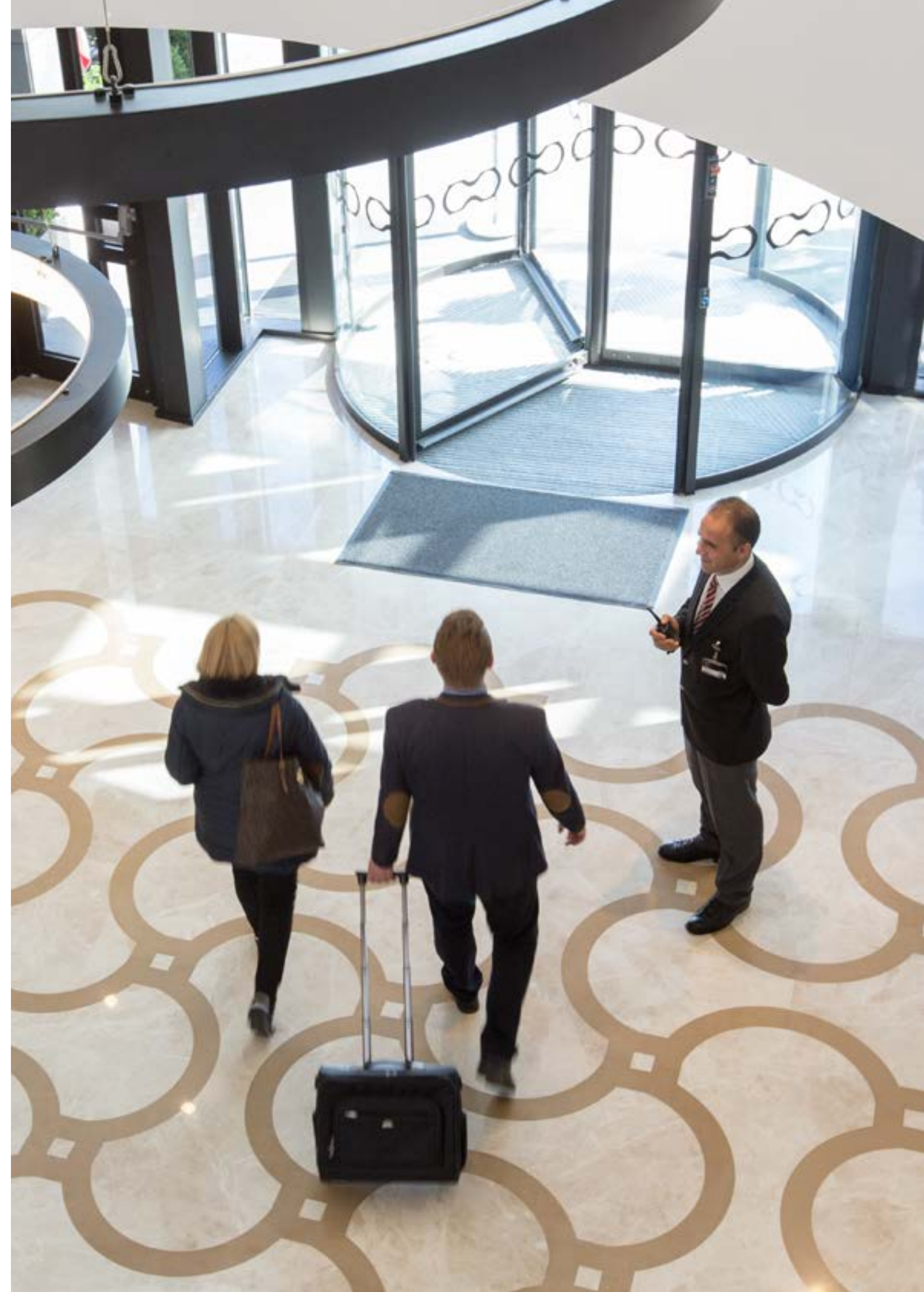
If our work outside or other interests affect our motivation or performance of our work as a Gözen employee, then it means there is a conflict of interest. It is not ethically correct to work at a second job in a competitor company or its affiliate and it is unacceptable. The company does not support us to work at a second job with a customer, supplier company or a supplier of goods and services. Such relations are possible only with the consent of the management. Even if we are allowed to work outside, we should not forget that all confidentiality agreements made with the company are binding for us as an employee.

- **Accepting the Gifts, Invitations, Credits and Other Treats**

We should not give or want, accept, offer, promise or receive anything of value such as loan, services, entertainment, privilege or gifts to or from any person or company directly or indirectly as a condition or result of working with Gözen. We should comply with the relevant standards, policies and procedures of the company regarding the gifts, meals and entertainment.

Gözen policy does not prevent the exchange of gifts of reasonable value between our employees and the persons with whom they do business, normal business dinners and entertainment activities and mutual customary courtesy behaviors and also similar conventional and reasonable expenses intended to increase the general business and the company's value; however, such gifts of reasonable value, dinners and entertainment activities should be accepted provided that they are not offered at regular intervals or frequently.

The expenses and costs of gifts, dinners and entertainment activities offered to the persons with whom we do business should be reasonable and recorded completely and correctly in the company's accounting books.



Personnel Rules

Our employees are our most important sources. Gözen Security aims to be a strong, reliable and steady employer, and supports a relation based on mutual respect and sensitivity. We strongly believe in the connection between the competence of our employees and the result we achieve. Gözen Security endeavors to be a preferred employer offering good working conditions, fair wages and personal development opportunities in order to attract the qualified people.

● Equality of Opportunities

Gözen's policy is to behave honestly and fairly to all its employees or the persons applying for a job regardless of their race, color, religion, sex, age, nation, ethnical origin, marital status, pregnancy, disability or invalidity and to offer equal opportunities for everybody.

Each of us is responsible for the implementation of this policy and explaining it to the employees. Each of us should monitor the performance shown for the equality of opportunities and report the situations and results detected to our superiors or to **Gözen Ethics Line** (0212 370 30 69) and proceed with the corrections and changes if necessary.

● Discrimination and Harassment

Gözen gives great importance to the creation of a working environment made free from any verbal and physical harassment based on race, ethnical origin, religion, physical or sexual or another factor legally prohibited. We should precisely avoid any attitude which makes any criteria regarding the foregoing a precondition of working in Gözen, leading to a working environment full of suppression, intimidation, hostility or aggression or reducing the performance of the employee inequitably.

We should not forget that, if Gözen does not take any measure or make any attempt when it is or should be normally aware of such a behavior, the superiors and directors of the personnel incurring discrimination or harassment will be held responsible as well as the company.

What should we do?

- We should ensure that the individuals or groups do not incur discrimination based on the factors unrelated to their skills required to perform their duties.
- We should not be involved in any type of harassment or abuse or any aggressive, threatening, ill-intentioned or libelous behavior.
- We should support and introduce Gözen's commitment to diversity, individual contribution and a fair and non-harasser workplace.





- **Reporting the Instances of Discrimination and Harassment**

An employee who is involved in an incident of harassment and displays discriminatory behaviors is subjected to various disciplinary penalties including the termination of the labor contract as well as the penalties stipulated by the laws. Directors are responsible for the creation and maintenance of a working environment free from harassment and discrimination.

Gözen aims to establish an open platform for the settlement of the problems, concerns, difficulties and complaints related to harassment or discrimination. In this context, our part is to exchange information with our superiors, other chiefs or **Gözen Ethics Line** (0212 370 30 69) about such situations.

- **Use of Addictive Substances**

While respecting the right of privacy of the personal information, we see the use of the addictive substances as a serious problem threatening the worker's health and work safety. We give great importance to the creating of a working environment free from alcohol, pills and drugs in order to strengthen the health and welfare of the employees and to increase the competitive power of Gözen.

Our policy has been totally designed according to the target of elimination of the drug addiction. In case an employee displays unexpected behaviors or is suspected to take alcohol or drugs, **he/she may be asked to have a test made to determine this.**

In this context, our part is to exchange information with our superiors, other chiefs or **Gözen Ethics Line** (0212 370 30 69) or through "gozensecurity@etikhat.info" online e-mail address about such situations.



● Ethics Line

ETHICS LINE is managed by an appropriate supplier company completely independent from GÖZEN SECURITY. It is a report line where GÖZEN SECURITY employees share their opinions and express their concerns about the ethical subjects such as mobbing, discrimination, harassment, theft, irregularity, misconduct, corruption, conflicts of interests, behavioral problems, abuse.

Said line serves as a report line through the telephone number specially created for GÖZEN SECURITY for the contracted company (0212 370 30 69) or “gozensecurity@etikhat.info” online e-mail address.

Gözen ETHICS LINE serves on official business days between 09:00 – 18:00. A suitable announcement will be activated for the calls outside the working hours and the calling employee shall be informed about the result.

You can call without giving your name if you will feel better. It is not required to reveal your identity information in the calls. If you give your identity information, your information shall be kept confidential unless it is required to be made public in legal formalities or in an administrative investigation. Gözen does not tolerate reprisal to report a problem or support an investigation. Any employee who makes reprisal to a person that reports a concern in good faith shall be subjected to a disciplinary action.

What should we do?

- To immediately report any potential and actual violations of rules, policies, procedures or standards to the department manager or HR team or to raise our voice if we are not sure about what to do in a specific situation, to immediately report the incident violating the ethical rules using the Ethical Line communication channels.

Social Rules

● Work Safety and Protection of the Environment

Each employee should behave in a way encouraging a positive security culture and clearly resisting to unsafe behaviors. Everybody working in our company has duty and responsibility for the environment, health and safety. For this reason, we are expected to:

- Conduct our activities safely and in a way not constituting any problem in terms of the environment,
- Follow the procedures and policies published by our company on "Occupational Health and Safety".
- Intervene in the unsafe behaviors of others in a timely manner and show that they are unacceptable.
- Report the accidents, incidents, failed attempts, unconformities with the regulations and anything which pose a risk in terms of health, safety and security.
- Comprehend the hazards associated with our work and the work of our colleagues, manage the risks responsibly and make sure that the necessary health and safety training is completed.
- Integrate health, safety and security concerns with the daily working activities.
- Inform the necessary departments when a case of emergency occurs at the workplace.
- Make the Environment, Health and Safety standards a part of our workplace and work and contribute to the efforts aimed to protect the natural environment and the working environments.

● Demands from the Media and Public Opinion

Gözen is determined to give correct and reliable information to the media and public. All explanations made to the public including the estimations and foresights, press releases, speeches and other correspondence should be accurate, honest, timely and reflect only the truths. In order to ensure the accuracy and consistency of the information given about our company, the question should be answered only by one person in charge of media relations. As the questions directed to our company by the media and/or other sections of the society should be replied only by the persons authorized by Gözen pursuant to Gözen Information Policy, we should not answer such questions if directed to us.



- **Political Activities**

Gözen encourages the candidacy of the company personnel for various public services when applicable. However, we should make such attempts as a personal process with all responsibilities and results thereof, and should not give an impression that we act on behalf of the company. It is not proper for the company personnel to conduct political activities and use the company sources for this purpose during the normal working hours in Gözen.

- **Social Responsibility**

As an integral part and participating member of our country and society in which we live, we should be sensitive to the needs of the society. It is important for us to improve the living standards in our country and around us and we should all contribute to this.

Taking account of the fact that such contribution will positively affect our success and existence in long term, we should be sensitive to the environmental problems and take the necessary measures in order not to damage the environment with our activities. The company aims at all times to be the number one preference of its customer, to fulfill and maintain its social and environmental responsibilities with the transparent management principles.

It should be our target to use the natural resources and any sources of energy in the most efficient and economic way, to take the waste and noise pollution under control, and to mitigate the negative effects of the activities on the environment and the human health.

Gözen has also adopted as a principle to support the society in which it exists about the storage of the training, equality of opportunities, health and cultural values under the social responsibility awareness.





● Implementing Procedures

It is explained below what kind of a sense of responsibility should be used in any environment in which we work:

- We should learn, live and sustain the company standards. We can be a good example by learning, understanding and implementing the laws related to our business, Gözen policies, procedures and our ethical rules.
- We should learn the laws and not abstain from asking questions, regardless of how difficult they seem. We should learn well the laws regarding the concrete duty we perform and the level at which we are located. If we do not know whether any law or Gözen policy is valid or not in a certain case, and even whether there is a policy on that subject, we should not abstain from asking the authorities.
- We should not make assumptions. It is wrong to make assumptions such as “Top management already knows this” or “management does not engage in this”. We should not fall into an error such as accepting in advance that no transaction will be performed. We should not forget that Gözen management staff exist to increase the legal and ethical behavior standards at all times. Moreover, all management levels bearing responsibility are liable to take into consideration any concerns and complaints of the personnel and to answer them. We should explain everything we consider to be incorrect or unfavorable to our superiors and chiefs.
- We should not ignore the situations contrary to the laws or Gözen policies and the Code of Ethics. We are all required to take the laws and company policies seriously. If we think that somebody breaks a law or code of ethics, we should immediately take action for the correction or examination of the problem.
- We should help the development of the inspection mechanisms and the procedures. It may not be possible to determine some situations which are contrary to the laws and company policies using the available inspection mechanisms and procedures. If we think that they should be developed or if we have such proposal, we should take action without any hesitation.
- We should not feel under pressure. We are not expected to violate any law, company policy or code of ethics, and we should not get the impression that we are encouraged or under pressure in this direction. Even if any action violating the law or general Gözen policy helps to achieve a performance target or raise the level, we should never leave the correctness.



• Questions to be Asked about Fair Behavior

Following questions directed to us may help us decide whether a behavior is ethical or not:

- Do my behaviors comply with the rules of law?
- Do I behave fairly and honestly?
- Would I be annoyed if another person (rival company) did what I did?
- Do I behave according to Gözen values and ethical standards?
- Does not behaving as necessary in this case make the situation worse or cause the continuation of a "mistake"?
- If I was seen on the first pages of the newspapers on a morning, how would my behavior seem to me?
- If I gave a statement in a court, how would I answer when I was asked to explain what I did?
- Could I defend before my family, children or friends what I did?
- Could I bravely advise others to behave like me?
- Does the perceived correspond to the truth in my head? How would my behaviors be understood?

• Questions to be Asked about Potential Conflict of Interests

If your pecuniary or different interests or liabilities outside Gözen affect your job in the company, then there is a potential conflict of interests. Following are some questions which you should ask yourself in order to decide whether there is a potential conflict of interests in a certain case:

- Do I have substantial material benefit in a company working with Gözen?
- Do I spend time for a business I established externally or for my hobbies during my normal working hours in Gözen?
- Do I receive valuable gifts frequently from the suppliers, competitors or customer companies? If I receive, can such gifts affect my decisions in the company or cause to the impression that they affect?
- Am I in a position to employ or be direct superior of my spouse, a relative or a close friend?

Headquarters Office

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İstanbul Atatürk Airport Office

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