

INOGAR Coop

Code of Business Ethics and Conduct

The processes in this document were taken by the Board of Directors of the Sınırlı Sorumlu İnoğar Sosyal Kalkınma Yardımlaşma İnovasyon ve Proje Danışmanlığı İşletme Kooperatifi on 01.03.2021. Unless a different decision is taken by the Board of Directors, the processes in the document are valid.

In the scope of its ethics and values, INOGAR works with partners who are committed to the values of democracy, free markets, and good governance. INOGAR programs reflect the needs and the aspirations of its partners, respect their priorities and approaches, and promote the role of the private sector in building and strengthening democratic institutions and advocating economic reform.

The following are INOGAR's core values:

Integrity - INOGAR commits to being honest and forthright in its communications and to honor its commitments.

Openness - INOGAR operates in a transparent manner and makes available information on its programs and materials pertinent to the understanding of democratic and economic reform.

Fairness - INOGAR offers equal opportunity for participation in its programs and activities consistent with its stated policies and procedures.

Respect - INOGAR affirms the right of self-determination and the dignity of people and the roles they play in democratic development.

Human Rights - INOGAR employees, partners, contractors or any related project employees are prohibited from engaging in any and all forms of trafficking, procuring commercial sex acts, or using forced labor in the performance of the agreement.

Employment - INOGAR is committed to fostering a work environment in which everyone is treated with respect, and which promotes equal employment opportunities.

Accountability – INOGAR pledges to hold itself to the exacting standards outlined above.

INO GAR Cooperation strives to embody the highest standards of ethical behaviour and transparency in both its internal and external dealings, and is committed to act at all times in a manner consistent with Turkish law and regulations and internationally-accepted standards. INOGAR Code of Business Ethics and Conduct sets forth the standards for *all INOGAR employees and partners* with respect to ethical behavior, legal compliance, and business and professional conduct. INOGAR employees and partners are expected to perform their duties in good faith, with honesty and integrity, and in furtherance of the goals, mission and purposes of the organization. The reputation of INOGAR depends on its employees' and partners' adherence to these standards and values, and to the principles and standards set forth below.

Compliance

- 1.) Employees and partners have a responsibility to understand and follow the Code and may be required to certify periodically that they have reviewed it. In the event of a violation of the Code, INOGAR management will determine the appropriate action to be taken, which may include disciplinary action up to and including dismissal. The Code may be revised from time to time with notification to employees and partners.
- 2.) Employees and partners should refer any questions they have about compliance with this Code to one of the Executive Board Members, who will serve as INOGAR's designated Ethics Officer, or to the Human Resources Department (HR).

Reporting Violations

An employee or partner who becomes aware of any suspected, planned or actual violation of laws, regulations, financial or accounting standards, ethical practices, or company policies, including this Code, by an officer, director, employee or any other person connected with INOGAR, should report their concerns in written. Employees and partners are expected to cooperate fully with any investigation by INOGAR or any governmental agency into such violation or suspected violation.

General Principles

The following General Principles form the basis for the Standards and Guidelines which can also be found in the INOGAR Operational Manual. **INO GAR employees and partners are responsible for familiarizing themselves with all parts of the Code, including those in the Manual.** While the Code seeks to address the major ethical and legal challenges employees or partners may face, it cannot anticipate every situation. In circumstances not covered by this Code, employees and partners should conduct themselves in accordance with the principles set forth below, and use them as guides in determining proper conduct.

- 1.) **Compliance with Laws** - Employees and partners are expected to adhere to all laws, regulations, and other official directives governing their own or INOGAR's activities in Turkey and abroad. In the case of conflict or discrepancy between the Turkish law and another country, employees or partners should seek guidance from the Executive Board Members.

- 2.) **Loyalty** - Employees and partners must at all times place loyalty to INOGAR and its mission above private gain and avoid any act or omission that might tarnish INOGAR's reputation.
- 3.) **Impartiality** - In the selection of vendors and program partners and the assessment of their performance under contracts, employees and partners should act fairly and impartially, making decisions solely on the merits and without improper bias.
- 4.) **Integrity and Transparency** - Employees and partners are expected to deal ethically, honestly, and transparently with INOGAR's program partners and funders, board members, partners and fellow employees, making sure that information shared and representations made are complete, accurate and clear.
- 5.) **Respect for Company Property** - Employees and partners are responsible for the proper use of INOGAR's resources and property.
- 6.) **Financial Stewardship** - Employees and partners are responsible to account accurately and fully for INOGAR's funds and other resources.
- 7.) **Duty to Report** - Employees and partners must report any illegal, unethical, or wasteful activity of which they become aware in the manner directed by INOGAR policies.
- 8.) **Striving for the Highest Ethics** - Employees and partners should avoid actions creating even the appearance of violations of any laws, ethics or standards of conduct in this Code.

I have read and agree to follow the INOGAR Code of Business Ethics and Conduct, including these General Principles and the Standards and Guidelines in the INOGAR Operational Manual.

Employee/Partner Name:

Employee/Partner Signature:

Date: