
	<b>Code of Business Conduct</b>	<b>Document No:</b> TİN-MAD-K-001
		<b>Issue date:</b> 28.10.2017
		<b>Revision No:</b> 02
		<b>Revision date:</b> 03.03.2021

**"TELEKOM INVEST" LLC**

**CODE OF BUSINESS CONDUCT**

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### Appeal of General Director

Dear Colleagues,

the rules, policies and guidelines contained in this document are the leading guidelines for "Telekom Invest" in the conduct and management of business activities. Let's all get acquainted with, analyze and understand these principles and rules. If you have any question about this code or if you have any suggestion for this code, you should ask our Lawyer or Human Resources Specialist for clarification and their opinion.

I am sure that by following the rules and principles set forth in this code, "Telekom Invest" will be able to maintain and strengthen the reputation and trust it has gained over the years.


As the General Director of the Company, I promise to strictly adhere to the requirements of the Code, as well as the principles of anti-corruption, in all my actions and decisions. I expect the same behavior from my employees and workers who are considered as "employees of the Company". The development and prosperity of our Company as a whole and of each of us individually depend on it.

Thank you in advance for your efforts and attention to support this position of our Company.




ANVAR AHMADOV

GENERAL DIRECTOR of "TELEKOM INVEST" LLC

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### 1. What is our code and who should follow it

Our code is a useful tool for informing employees and others, helping them to make decisions in accordance with ethical norms.

Our Code applies to all "Telecom Invest" employees, executives and management representatives. We expect and invite all our suppliers, customers, partners and their employees to act in accordance with our Code.

### 2. Responsible and safe action

For us, there is nothing more important than the health, technical and physical safety of our employees, as well as a responsible approach to the environment. We should be vigilant and disciplined and always take care of each other. Threat, blackmail and violence shall not be tolerated.

- ✓ Do not perform the work that you are not professional in.
- ✓ Stop performing the work if you feel that the work done by yourself or others is dangerous.
- ✓ Fulfill your duties to protect the environment.

### 3. Our employees

The successful activity of "Telekom Invest" is underpinned by our employees. As a company, we achieve our goals when we treat each other with respect and dignity. We all have a role to play in maintaining a corporate culture based on the principles of respect and justice.


We get more achievements when we work in an environment with different specialties and various talents and ideas.

We consider any form of insult or harassment intolerable. Remember that harassment shall not be tolerated in the workplace.

- ✓ Help create a work environment away from all kinds of bullying / harassment.
- ✓ Inappropriate sexual harassment or any other sexual misconduct will be considered intolerable.

"Telecom Invest" respects the privacy of its employees. We may use personal information only when necessary to act effectively or to comply with the law.



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"Telekom Invest" employees should refrain from engaging in relationships that could lead to any actual or potential conflict of interest, or in any case adversely affect their freedom of action or opportunity to put forward an idea while performing their duties at the company.

- ✓ Be aware of the many different situations in which interests may conflict. For example:
  - External affairs and relationships with competitors, customers or suppliers.
    - to cooperate with government officials or their close relatives.
    - Kinship relationships of executives, directors or leading employees with Civil Servants or former Civil Servants.
    - To act as a member of the Board of Directors of another organization.
- ✓ Inform us about situations that could lead to a conflict of interest. If such a situation is known in advance, we shall have a better chance of overcoming it.

To ensure that there is no conflict of interest, once a year all our employees shall complete and submit to our HR manager APPENDIX 2 - CONFLICT OF INTERESTS LIST AND DECLARATION FORM attached to this Code.

#### **4. Our suppliers, partners and customers**

We work with our suppliers, partners and customers on the principles of honesty, mutual respect and responsibility. "Telekom Invest" itself is a reliable partner for other companies.


Our suppliers are of great importance to carry out our activities and meet customer expectations. Therefore, we choose them carefully and refer an objective selection process. In this selection process, the copy of "Appendix 3" QUESTIONNAIRE FOR SUPPLIERS (attached to the code) completed by the relevant supplier is analyzed.

Do not engage in activities that are listed below to avoid behaviors that harm the competition:

- to make false price offers;
- to distribute customers;
- to agree in any form to limit supplies.

#### **5. Work with state bodies**



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"Telekom Invest" shall not pay, offer or allow any direct or indirect payment, gift, and/ or other benefit directly or through any other person for the use or benefit of any civil servant, or any political party or any third party, in cash or in any other way which is deemed to violate any applicable anti-corruption legislation.

"Telecom Invest" should not engage in commercial activities with any person, knowing that any of the terms of the Anti-Corruption Legislation may be violated. Special attention should be paid to agreements with representatives of state bodies. "Telecom Invest" can only reimburse the reasonable and legally permissible costs associated with the proper execution or performance of any contract with with any state body.

Work with state bodies should be carried out in accordance with APPENDIX 4 - RULES OF CONDUCTING WORKS WITH STATE BODIES attached to this code.


We consider any kind of bribery and corruption in our activities intolerable. We comply with anti-bribery laws and regulations, as well as APPENDIX 1 - **ANTI-BRIBERY & CORRUPTION POLICY**, which is an integral part of this Code, and support efforts to eliminate bribery and corruption around the world.

## **6. Our transparency in the field of Finance**

"Telecom Invest" adheres to its confidentiality obligations and strives for transparency and accuracy in all transactions. That is why the executives are responsible for keeping the necessary records of Telecom Invest's activities and business relationships. No false or incorrect or inaccurate records can be included in our accounting books and documents. All monetary transactions must be completely and fully included in our accounting documents. All costs and expenses, incomes and revenues, incomes and expenditures and financial liabilities must be included in the financial statements in a timely, complete and accurate manner and must have the relevant supporting documents submitted in accordance with any existing legislation and the terms of relevant internal control system.


## **7. Sponsorship and donations**

Sponsorships and donations are a great way to grow our business and support the community we serve. We shall always plan them and act in a way that supports our business goals in an ethical way and creates social value.

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Political payments or charity or sponsorship that can be considered a bribe are not allowed. We only offer or accept support that is consistent with our business and sustainability strategy. We always evaluate choices in terms of reputation and corruption risks, document the choices and follow all necessary steps.



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## Appendix 1

### ANTI-BRIBERY & CORRUPTION POLICY

#### 1. Purpose

The purpose of the anti-bribery and corruption policy is to ensure compliance with global anti-corruption rules, ethical and professional principles and legislation.

#### 2. Field of Application

Anti-bribery & corruption policy are applied to:

- ✓ All employees of "Telecom Invest",
- ✓ Our customers,
- ✓ Our suppliers,
- ✓ Our partners and counterparts

#### 3. Basic Concepts

Corruption - is the direct or indirect abuse of official power.

A bribe is a request or receipt of a material or other benefit, privilege or concession for him/herself or for third parties, directly or indirectly, personally or through an intermediary, or accepting an offer or promise in this regard.

#### 4. Scope of functions and responsibility

**4.1** The General Director is responsible for the implementation and enforcement of this Policy and for all employees, stakeholders and business partners to be familiar with this policy and its requirements. is responsible for the approval of this policy every year.


**4.2** The lawyer is responsible for conducting educational activities, trainings and monitoring activities to assist in ensuring policy compliance according to the description provided in this guide.

**4.3** All employees, suppliers, customers and business partners are responsible for compliance with this policy

#### 5. Gift, hospitality, entertainment and travel

We do not accept or offer gifts, hospitality, entertainment or travel in exchange for any business activity, services or confidential information or for the purpose of influencing a decision.



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No gifts or hospitality may be provided for the purpose of making any kind of profit or influencing the outcome of any business decision. "Telekom Invest" employees should not offer/accept gifts, money, debt, invitations or any other form of special attitude any person/from any person involved in business relations with "Telekom Invest", whose main purpose is to influence business decisions, or allow any family member or relative to accept them.

Appropriate behavior in relation to gift, hospitality, entertainment and travel is determined by APPENDIX 5 - GUIDELINES ON GIFT, HOSPITALITY, ENTERTAINMENT AND TRAVEL attached to the "Code of Business Conduct".

Relevant notes on gifts, hospitality, entertainment and travel are made in the APPENDIX 6 - JOURNAL ON GIFT, HOSPITALITY, ENTERTAINMENT AND TRAVEL which is attached to the Code of Business Conduct.

## **6. Bribery and Corruption**

"Telekom Invest" opposes all forms of bribery and corruption and intends to ensure compliance with relevant laws, rules and principles. Regardless of the purpose, accepting or offering bribes is intolerable.


"Telekom Invest" shall not pay, offer or allow any direct or indirect payment, gift, and/ or other benefit directly or through any other person for the use or benefit of any civil servant, or any political party or any third party, in cash or in any other way which is deemed to violate any applicable anti-corruption legislation.

Money laundering is the process of concealing illegal financial assets or attempting to bring them into legal form. This includes the use of legitimate financial resources to support crime or terrorism. "Telekom Invest" does not allow, or support, money laundering at any time.

## **7. Notes, accounting and payments**

No false or incorrect or inaccurate records can be included in our accounting books and documents. All monetary transactions must be completely and fully included in our accounting documents. All costs and expenses, incomes and revenues, incomes and expenditures and financial liabilities must be included in the financial statements in a timely, complete and accurate manner and must have the relevant supporting documents submitted in accordance with any existing legislation and the terms of relevant internal control system.



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## 8. Instructing

Employees and business partners of "Telekom Invest" may get acquainted with anti-bribery and corruption policy through uninterrupted and convenient website. In addition, the basic requirements of this policy should be communicated to all employees through appropriate training and education organized once a year.

## 9. Reporting on violations and suspicious cases and administrative measures for violations

**9.1** All employees are responsible for compliance with this policy.

**9.2** Any employee who has witnessed a violation of this policy should contact our lawyer or human resources specialist immediately.

**9.3** Our lawyer or Human Resources specialist should prepare a report on these violations and submit it to the General Director. This report should be compiled in the FORM OF REPORTING ON VIOLATION OF THE CODE - APPENDIX 7 attached to the Code of Business Conduct and all violations should be kept in the REGISTER OF CODE VIOLATIONS - APPENDIX 8 attached to the Code of Business Conduct.

**9.4** In case of the violation of this policy, the following administrative measures shall be applied:

**9.4.1** Written Notice of Violation

**9.4.2** In case of violations more than twice, the current contract will be terminated in accordance with the National Legislation.