

INVEO YATIRIM HOLDING A.Ş. CODE OF ETHICS

Inveo Yatırım Holding Code of Ethics is a guide for Inveo Yatırım Holding directors and officers, employees, and Business Partners.

Inveo Yatırım Holding attributes great importance to honesty and accountability in all of its activities. It is every employee's (of Inveo Investment Holding and its subsidiaries) duty to maintain a culture of honesty and respect, and to oppose behaviors which might contradict the Inveo Yatırım Holding's ethical standards. All Inveo Yatırım Holding and its subsidiaries' employees are bound by and shall comply with the regulations of countries where Inveo Yatırım Holding operates, as well as Inveo Yatırım Holding Code of Ethics. Inveo Yatırım Holding subsidiaries may determine their own ethical principles as long as they do not contradict with Inveo Yatırım Holding Code of Ethics, and they may adopt stricter rules and principles provided that such rules and principles are in conformity with Inveo Yatırım Holding Code of Ethics, and the relevant policies and comply with the applicable regulations.

Inveo Yatırım Holding and its subsidiaries comply with the following ethical rules:

- › Maintains worthy-reputation; Inveo Yatırım Holding acts in accordance with laws and relevant company policies, in all the countries operated in.
- › Complies with all applicable laws, regulations, and restrictions due to the nature of its activities.
- › Carries out its activities within the framework of the principles of equality, transparency, accountability and responsibility.
- › Respects and defends the interests of its stakeholders, and ensures that they are kept informed as to the company's position as necessary.
- › Takes every precaution to prevent conflicts of interest.
- › Makes the utmost effort to ensure that the information created by the business, shared with the public, and submitted to regulatory agencies is entirely accurate, whole, intelligible, and timely.
- › Considers every employee as equal within the company and provides a fair and safe working environment.
- › Protects the personal dignity and legal rights of all employees.

Employees of Inveo Yatırım Holding and its subsidiaries comply with the following ethical rules:

- › Act in accordance with the laws and internal regulations.
- › Adopt and protect the name and prestige of Inveo Investment Holding.
- › Behave moderately and carefully in their relations with each other, with their subordinates and superiors.

- › Avoid any circumstances that might prevent objectivity, offer benefits to themselves or their relatives, as well as any situations where personal interests and obligations to Inveo Yatırım Holding might conflict when making decisions in accordance with their roles and responsibilities.
- › Avoid conflicts of interest or gains.
- › Strive to increase their professional knowledge and experience and improve themselves.
- › Act consciously of their responsibility to maintain the confidentiality of company information.
- › Use the company's resources and assets properly.
- › Responsible for alerting management in any situation where the standards are broken.