

HALK GAYRİMENKUL YATIRIM ORTAKLIĞI

CODE OF ETHICS

Contents

Introduction	1
1. Relations with Customers	2
1.1. Know your customer	2
1.2. Equality	2
1.3. Informing customers	2
1.4. Customer data confidentiality	2
1.5. Customer transactions	3
1.6. Customer complaints	3
1.7. Customer power of attorney and account agreements	3
2. Competition	4
2.1. Actions that contravene competition law	4
2.2. Fair competition	4
2.3. Relations with suppliers and competitors	4
3. Data Security and Confidentiality	5
3.1. Information about Halk GYO	5
3.2. Prohibition on information trafficking	5
3.3. Information systems	5
3.4. Electronic and other data confidentiality	5
4. Employees' Responsibilities	6
4.1. Managers' responsibilities	6
4.2. Protecting Halk GYO's assets	6
4.3. Relations with public and regulatory authorities	6
4.4. Workplace behavior and personal appearance	6
4.5. Intellectual and commercial property rights	7
4.6. Insider Trading	8
4.7. Conflicts of interest	8
4.8. Personal finance standards	8
4.9. Print or visual media and the use of social media	9
4.10. Activities outside employment	9
5. Gifts and Promotion	11
5.1. Acceptance of gifts and personal benefits	11
5.2. Giving gifts and other benefits	11
6. Halk GYO's Responsibilities Towards Its Employees	12
6.1. Employee rights	12
6.2. Impartiality in hiring, assignment, and promotion	12
6.3. Working hours	13
6.4. Prevention of psychological harassment	13
6.5. Protection of Personal Space	14
6.6. Occupational Health & Safety	14
7. Anti-corruption policy	15
8. Code of Ethics implementation	15
8.1. Code of Ethics Training	15
8.2. Reporting Code of Ethics Violations	16
8.3. Enforcement	16
9. Execution and Review	16

The Code of Ethics is a set of principles and work rules with which the employees of Halk Gayrimenkul Yatırım Ortaklığı. (Halk GYO) must comply during the fulfillment of their duties. The underlying goal of this manual is to prevent any and all manner of disputes and conflicts with respect to such matters that might arise among Halk GYO, its employees, its shareholders, its customers, and its other service providers.

Halk GYO's employees must comply with the Code of Ethics, the governance of which is rooted in the notions of fairness, integrity, honesty and social responsibility.

The following principles are fundamental to the implementation of the Code of Ethics:

- Aware that they are the members of a team, employees TRUST Halk GYO, their colleagues, and their supervisors in the conduct of their work.
- Mindful of and complying with the requirements of laws and of the Halk GYO's internal regulations, employees are PRUDENT and HONEST in the conduct of their work.
- All employees treat stakeholders EQUAL and behave in an IMPARTIAL manner while serving products and services.
- When relating publicly-disclosed information to stakeholders, employees are TRANSPARENT and recognize that Halk GYO's actions are guided by the principle of ACCOUNTABILITY.
- In both their professional and their private lives, employees are SOCIALLY and ENVIRONMENTALLY AWARE and they avoid displaying any behavior or attitudes that would injure Halk GYO's reputation.
- With its sense of SOCIAL RESPONSIBILITY, Halk GYO engages in corporate activities that are beneficial to the health, wellbeing, and happiness of society and it voluntarily takes part in supports socially responsible efforts and projects for the sake of a better society and environment.

The Code of Ethics is essentially a set of unwritten laws which people have agreed to abide by among themselves. The most important difference between "ethics" and "morals" is that moral behavior is rooted in the values of a particular society whereas universal human values are what underpin ethical behavior.

universal
human
values

Fairness, integrity, honesty and social
responsibility in governance

professional integrity

Employees deal with customers as professionals who are at all times guided by the principles of respectfulness, trustworthiness, integrity, and honesty.

1. Relations with Customers

1.1. Know your customer

In their dealings with customers, employees must behave as professionals who are at all times guided by the principles of respectfulness, trustworthiness, integrity, and honesty. Employees know their customers by gaining knowledge of the customers' businesses and activities, and offer customers products and services that are compatible with their financial needs.

Besides reducing and managing money-laundering and terrorism-financing risks, the "Know Your Customer" rule also makes it possible to identify transactions that are associated with illegal activities. It is much easier for Halk GYO that is sufficiently aware of its customers and their activities to spot when a transaction is suspicious. Finally, effective adherence to this rule helps protect Halk GYO's national and international reputation.

1.2. Equality

All of Halk GYO's products and services and all of its publicly-disclosed information must be provided equally to all customers without making any distinctions among them with respect to language, religion, race, gender, or anything else. When pricing Halk GYO's products and services, employees must comply with Halk GYO's internal rules and with applicable laws and regulations.

1.3. Informing customers

When communicating with Halk GYO's customers, employees must refrain from providing them with any information that is false, misleading, or exaggerated.

Whenever an employee is asked for information that is not about one of Halk GYO's standard products or services but is in the nature of professional investment advice, the customer should be directed to a specialist who is authorized to deal with such matters.

Employees that do not have authorization from their customer should not sign them up to unwanted products or include them in campaigns that they do not qualify for.

1.4. Customer data confidentiality

Information about customers must be divulged only to parties who are explicitly authorized by law to receive such information, only if the limits of such divulgence are explicitly defined and only with the customer's approval. This rule applies equally to former employees who no longer work for Halk GYO. The possibility of releasing customer-specific information to outside parties must be presented to customers as an option and the customer's choice on this matter is fundamental.

Employees may not make use of any customer- or supplier-related information they may have access to except for the performance of their jobs. They must avoid accessing information or documents pertaining to the customers of Halk GYO unless such access is directly related to the nature and scope of the task they have been assigned or of the job they are expected to do.

1.5. Customer transactions

Employees must execute customer transactions completely and in the least amount of time possible. Customer transactions must be performed as required by applicable laws and regulations. No employee may be a party to any customer transaction unless the transaction is conducted through Halk GYO; neither may an employee provide a customer with guidance on such matters. Customers are not allowed to use any equipment, vehicles, hardware, software, or other Halk GYO-owned assets which have been assigned to an employee.

Customer requests that are contrary to laws and regulations must not be complied with.

1.6. Customer complaints

Procedures and channels have been devised for customers to report their complaints to Halk GYO. All customer complaints must be processed and responded to as described in Halk GYO's publicly-disclosed Disclosure Policy applicable to such matters.

1.7. Customer power of attorney and account agreements

Employees may not, whether directly or indirectly, act as the heirs or custodians of customers except in cases where the customer is a family member or close relative of the employee. Except in the case of portfolio management agreements, no employee may act on a customer's behalf as their legally-empowered custodian or deputy; neither may an employee accept any power of attorney that grants them control of a customer's accounts. Employees may not open joint accounts with customers.

Customer transactions must be performed as required by applicable laws and regulations and within the least amount of time.

duty of care in customer transactions

Equal treatment of all customers in the presentation of products, services, and information

2. Competition

protection of competition

Employees comply with the requirements of law, with the decisions of competent authorities, and with Halk GYO's internal regulations pertaining to the protection of competition

2.1. Actions that contravene competition law

Employees must not under any circumstances enter into understandings with competitors or engage in behavior that would affect pricing and/or marketing policies.

Employees must not engage in any act or behavior that could be interpreted as being manipulative.

2.2. Fair competition

Employees must not engage in any act or behaviour that would damage a competitor's reputation; must not access competitors' information or documents in an unethical or unprofessional manner; must not make use of information or documents unethically or unprofessionally obtained to secure an unfair competitive advantage.

2.3. Relations with suppliers and competitors

Employees must comply with the requirements of law, with the decisions of competent authorities and with Halk GYO's internal regulations pertaining to the protection of competition. Employees must not make disparaging statements about competitors or their officers in the press or media or on social media platforms if such statements could unmistakably be associated with a particular competitor. Employees must not collude with competitor firms in attempts to boycott any supplier or customer. Employees who procure goods and services from suppliers must do so competitively and transparently. Employees must not collude with competitor firms in attempts to prevent new competitors from entering the market, to fix product or service prices, or alike. When accessing information about other firms or REITs, employees must not have recourse to unethical or illegal methods and must prevent other employees from doing so. Only information which other REITs have publicly disclosed through such means as websites, price schedules, advertising, publications, etc. may be used for analytical or other business purposes.

Ethical and professional behavior

3. Data Security and Confidentiality

Basic principle:

Any and all manner of information belonging to Halk GYO is of a proprietary and confidential nature and must not be divulged to outside parties or used for commercial purposes. The rules governing information confidentiality are equally binding on former employees even after they no longer work for Halk GYO.

3.1. Proprietary information about Halk GYO

All information about Halk GYO is confidential and belongs exclusively to Halk GYO. This includes but is not limited to trade secrets, financial data, and customer and employee data; it also encompasses both knowledge about materials, programs, documents, IT and telecommunications systems, software, hardware, and all other arrangements and practices which employees may have access to and any business, contracts, or products etc. they may have been associated with during the performance of their duties. No such documents, information, or anything else may be used in any way whatsoever other than for the purpose for which they were intended as required by the performance of one's job at Halk GYO; neither may they be used for personal or private gain or for the benefit of any outside individual or organization. This prohibition applies both while an employee is working for Halk GYO and afterwards. Halk GYO owns the patent rights on its employees' inventions and discoveries.

3.2. Prohibition on information trafficking

Employees who have access to information of a confidential nature about Halk GYO, its customers, or the transactions and operations of either must not under any circumstances make use of such knowledge for personal gain as in, for example, the buying and selling of stocks and other financial instruments; neither may they convey such information surreptitiously or by other means to outside parties. This prohibition on information trafficking applies to all knowledge that employees may become aware of while they are employed by Halk GYO.

3.3. Information systems

Without proper authorization and permission, no software, hardware, or other component of any IT system developed within Halk GYO or procured from outside Halk GYO may be used or copied for any reason whatsoever, even if such use or copying is work or personal related.

3.4. Electronic and other data confidentiality

Employees should not use Halk GYO-owned equipment, systems, or servers (including email servers) to prepare, store, or send/receive their personal or private information. If they do use them, they will be deemed to have disavowed the confidentiality of such personal information and to have granted those who are responsible for Halk GYO's auditing and security functions the right to examine that information.

Employees are obliged to fulfill transactions of customers complete and as soon as possible.

Care in costomer transactions

exemplary behavior

All managers are responsible for fully complying with Halk GYO's code of ethics and for behaving as exemplars of Halk GYO's professed values.

4. Employees' Responsibilities

4.1. Managers' responsibilities

Besides fully complying with the Code of Ethics and behaving as exemplars of all of Halk GYO's other professed values, all managers are responsible for:

- Making sure that other employees are aware of Halk GYO's code of ethics and of other relevant rules and procedures;
- Establishing a workplace environment that encourages the ethical discussion of issues;
- Fully complying with procedures specified by Halk GYO for dealing with all employee complaints and notifications.

4.2. Protecting Halk GYO's assets

Employees must protect Halk GYO's properties and assets, avoid waste, and make productive use of Halk GYO's resources. Employees are subject to the penalties of law and of Halk GYO's internal regulations in situations where they misuse, steal, embezzle, or otherwise misappropriate Halk GYO's properties and assets. Employees may not use any of Halk GYO's properties or assets for personal purposes; neither may they remove them from Halk GYO's premises without the knowledge and approval of their supervisor.

Employees should exercise maximum care when using Halk GYO-provided work-related resources such as internet, telephone, and email connectivity and access to ensure that they are not used for personal purposes unless absolutely necessary. Personal use within limits is acceptable but such use should be kept to the minimum and must not in any case give rise to situations that are injurious to Halk GYO's reputation.

Employees must be careful and attentive in their use of Halk GYO-supplied vehicles and they should not allow the vehicles to be driven by other persons apart from very exceptional situations. Employees must obey traffic laws and rules when driving Halk GYO-owned vehicles and they will be liable for the payment of any traffic fines they may incur.

4.3. Relations with public and regulatory authorities

Relations with public and regulatory authorities must be conducted as prescribed by relevant laws and Halk GYO regulations. All information demanded by official agencies must be provided truthfully and in a timely manner.

4.4. Workplace behavior and personal appearance

Employees' behavior and personal appearance should be such as to reflect on Halk GYO in the best way possible. Adherence to this principle is extremely important from the standpoints of enhancing Halk GYO's prestige and interacting effectively with its stakeholders. Within this framework, employees must:

- Keep up with, be considerate of, and comply with Halk GYO rules governing workplace behavior and discipline;

- Dress themselves in a manner that is appropriate to a place of business, is unostentatious yet stylish, and is reflective of Halk GYO's seriousness;
- Not to use too loud tone of voice when speaking with their colleagues or on the telephone while at the workplace or onboard company-provided transport; avoid behavior that might disrupt others' concentration or motivation.
- Refrain from using the workplace as a platform for discussing political, social, or religious opinions or for advancing personal causes;
- Respect gender equality, be mindful of cultural differences, behave in accordance with public morality and generally-accepted social values;
- Not to take narcotics or make use of any other illegal substance; not to come to work intoxicated or consume alcohol during working hours;
- Not to bring any weapons or other injurious implements to the workplace unless authorized to do so by law and by Halk GYO's internal regulations;
- Not to gamble or engage in any business of their own at the workplace;
- Receive or entertain guests and visitors in places designated for such purposes and/or in appropriate communal areas.
-

Employees' behavior and personal appearance should be such as to represent Halk GYO in the best way possible.

representing Halk GYO

4.5. Intellectual and commercial property rights

Halk GYO's logo, trademark, imagery, corporate identity, and/or name must be used only in the context of performing one's job and only in keeping with Halk GYO-internal regulations pertaining to the use of its intellectual and commercial property rights. Employees must not use anything that can be associated with Halk GYO, such as its logo, trademark etc., on any platform or occasion when they are expressing a strictly personal opinion that is not attributable to Halk GYO.

No materials such as briefing statements, studies, reports, presentations or alike which have been expressly created for Halk GYO and which bear

Protecting and making effective use of Halk GYO's assets and resources

4. Employees' Responsibilities

debtor/creditor relationships

Employees comply with the legal regulations related to protection of competition, competent authorities decisions and Halk GYO regulations.

Halk GYO's identifying mark may be reproduced or disseminated without Halk GYO's permission.

4.6. Insider Trading

Information which an employee learns during the conduct of her/his work must not be used for any purpose other than Halk GYO's own business and never for the personal gain of the employee, or of other employees, or of any outside party. Any precaution is taken against this possibility of use.

4.7. Conflicts of interest

A conflict of interest may arise or appear to arise in situations where the personal interests of employees or of their position at Halk GYO are at odds with Halk GYO's interests; where the interests of two or more customers are at odds with each other; or where Halk GYO's interests are at odds with those of a customer. Such conflicts frequently arise on account of roles played or duties undertaken by employees or their relatives or by individuals, companies, or organizations with which they may be associated.

Employees must abstain from involvement in matters that could be interpreted as creating a conflict of interest and they must also refrain from influencing anyone who is in a position to make decisions on such matters.

Employees who think they are confronted by a situation in which a conflict of interest may arise must discuss the issue with their supervisor. If there should be any doubts as how to deal with the risk, the matter should be taken up with the Ethical Practices Team.

While it is permissible for a member of Halk GYO's board of directors to serve as a board member, manager, or consultant at another company, such service is contingent on the situation's not leading to a conflict of interest and on its **impede on the member's performance of his duties at Halk GYO**. This includes competing REITs and companies with which HALKGYO competes (REITs and other construction companies).

4.8. Personal finance

Employees may only borrow from companies and organizations that are authorized by law to extend credit and to grant loans.

Employees must not enter into debtor/creditor or surety relationships with Halk GYO's customers, suppliers, business partners, or similar related-party stakeholders. Debtor/creditor and surety relationships among employees are also disallowed as being uncondusive to a good workplace environment.

Employees must not incur debts in excess of their ability to service them. Employees should refrain from expenditures and from surety and other debtor relationships that might lead to their insolvency. Any employee

who becomes seriously indebted or who goes into default or insolvency must notify his supervisor of the situation.

4.9. Media statements, public appearances, participation in social media

Requests for interviews, statements, and the like that are to be published (newspapers, magazines, etc.) or broadcast (TV etc.) must be responded to only in coordination with the relevant department. No statement by a employee may appear in any media outlet except with such departmental permission. Employees may not speak, submit papers, or act as panelists at gatherings such as congresses, conferences, seminars, and the like which have not been organized by Halk GYO except with the permission of their unit's manager at the very least. No articles or other written materials or images or other visual materials in which an employee's position at Halk GYO is revealed may be used except with such departmental approval.

Employees' social media profiles and contributions must not be incompatible with Halk GYO's corporate identity. Employees contributing to social media platforms must not behave in ways or make statements which would defame or disparage Halk GYO, or its shareholders, or its customers, or its employees.

Employees are at liberty to express their own views and opinions but they must do so without mentioning that they are **employees of the company** and without implying in any way whatsoever—including but not limited to using written or visual materials that they are connected with Halk GYO.

4.10. Outside employment and other activities

Except in a few special cases, employees may not, whether directly or indirectly, engage in other paid work outside Halk GYO be it on weekdays, weekends, or holidays or during their annual leave.

Requests for interviews, statements, and the like that are to be published or broadcast must be responded to only in coordination with the related department.

media relations

Social media participation must be compatible with Halk GYO's corporate identity

4. Employees' Responsibilities

volunteer work

Employees may do volunteer work on conditions that such work does not impede their duties and responsibilities at Halk GYO or impair their job performance.

If an employee is a partner of any company, she/he cannot be appointed for a managerial duty. Employees acknowledge that Halk GYO's business relationships with such a company are subject to the provisions of Halk GYOing Act: specifically, Halk GYO may not enter into a credit relationship with any company in which an employee has a controlling interest and if such a relationship already exists, it must be terminated within six months of the date on which Halk GYO becomes aware of it.

Employees are at liberty to undertake duties outside Halk GYO as advisors, instructors, etc. for which they may be paid; however before they take up such positions, they must first obtain the written consent of the Human Resources Department.

Employees are at liberty work to as volunteers in legally-established charities, associations, non-governmental organizations, and alike on the condition that such work does not impede their duties and responsibilities at Halk GYO or impair their job performance.

Employees may freely exercise their legal right to join political parties however **they must engage in political activities only outside working hours, off Halk GYO premises, as individuals without making any use of Halk GYO-owned resources**, without making any reference to Halk GYO and without in any way compromising their professional integrity or Halk GYO's political neutrality. No leaflets, posters, or banners etc. of a political nature may be produced, duplicated, distributed, or displayed nor may political stances be advocated on Halk GYO premises. No Halk GYO-owned resources or premises may be used for the conduct of political activities; neither may Halk GYO personnel be employed for such purposes.

Members of the Board of Directors may undertake duties at Halk GYO itself as well as in Halk GYO's subsidiaries and affiliates; however they may not be partners in or managers of any company that serves as a supplier to Halk GYO.

Gifts and favors must not create conflicts of interest

5.1. Acceptance of gifts and personal benefits

While it is both natural and acceptable for Halk GYO employees to engage in social relationships with Halk GYO customers, it is important that such relationships do not lead to conflicts of interest. For this reason employees must neither request nor accept any form of personal benefit, payment, or gift from any outside party that does business with Halk GYO nor by their behavior suggest that they are doing so.

This rule does not apply to plausibly-valued gifts of a promotional nature which are consistent with the ordinary rules of hospitality or with commonly-accepted business practices which do not give rise to conflicts of interest. Under no circumstances however should employees accept gifts in the form of cash and/or cash-equivalent assets such as cheques, credit cards, or precious metals.

The Ethical Practices Team should be consulted whenever there are doubts as to how one should proceed in such matters.

5.2. Giving gifts and other benefits

Employees must be certain that gifts or other benefits that are given in the context of Halk GYO's business relationships do not lead to conflicts of interest among the parties involved. The following rules apply to such gift-giving.

- Gifts may be given at New Year's and on special occasions in line with Halk GYO-specified principles and provided that the gifts do not create conflicts of interest.
- With the exception of gifts that are customarily given on special occasions and during celebrations by persons acting on behalf of Halk GYO, no gifts in the form of cash and/or cash-equivalent assets such as cheques, credit cards, or precious metals may be given. Gifts must not be given and benefits must not be provided with the intention of influencing any party with which Halk GYO has entered or intends to enter into a business arrangement.

Subject to the rules outlined above and for the purpose of increasing staff motivation, managers may give their subordinates gifts, take them to theatrical performances, sports events, and alike, or host special dinners etc. for them.

Employees must neither request nor accept any form of personal benefit, payment, or gift from any outside party that does business with the company.

personal
benefit

6. Halk GYO's Responsibilities Towards Its Employees

whistleblowing

Whistleblowing is the reporting of illegal or unethical behavior or actions on the part of an organization by insiders of that organization to internal or external authorities with the power or mandate to deal with such behavior or actions so as to prevent such behavior or actions from causing harm to others whether inside or outside the organization itself.

Basic principle:

Rules and regulations governing work should be implemented and employees' beneficial loyalty to the company should be developed within the framework of mutual goodwill. All policies and practices (including but not limited to opportunity equality, performance evaluation, compensation, and fringe benefits) pertaining to personnel, their recruitment, and their employment are formulated by the Human Resources Department as required by applicable laws and regulations and they are implemented, unless otherwise contractually stipulated, in accordance with Halk GYO's internal personnel regulations.

6.1. Employee rights

Halk GYO takes care to ensure that employees are kept up to date about their rights under the rules to which they are subject and that these rights are provided to them in full and in a timely manner. All employees enjoy equal rights and opportunities on all issues such as training that will discover and/or enhance their potential and capacity, performance evaluation, fringe benefits, and workplace health & safety.

It is an essential principle that employees who report (whistleblowing) policy breaches will be dealt with confidentially and that such employees will not be prosecuted, discriminated against, or subjected to any unjust treatment on account of their having made such a report.

6.2. Impartiality in hiring, assignment, and promotion

Decisions pertaining to employees' hiring and promotion processes are based entirely on professional abilities, competencies and on no other considerations such as language, religion, race, creed, origin, gender, personal preference, or physical disability.

**Abilities and competencies are the
fundamental considerations in employees'
hiring, assignment, and promotion processes.**

Those who are involved in making hiring decisions must notify the Human Resources Department in situations where any candidate is a relative. No spouse or any first or second-degree relation of any person who is subject to this Policy may apply for a position which, whether hierarchically or functionally, reports directly to that person. Such individuals may however apply for other positions on condition that they will be given exactly the same consideration and treatment as all other candidates.

While kinship in and of itself does not rule out a person who is otherwise qualified for a position, it is an essential requirement that spouses are not to be employed in any department in which each has a first-degree power of signature. In situations where marriage contracts are entered into after the parties' hiring dates, the Human Resources Department must be notified. The Human Resources Department is authorized to make the final decision in all cases involving these and similar issues.

6.3. Working hours

Care is given to ensure that the number of people employed at a task is sufficient to the task's demands, that employees are assigned so as to maximize their productivity during working hours, and that employees do not work overtime unless it is necessary and that their overtime work entitlements are satisfied if they do.

6.4. Prevention of psychological harassment

Psychological harassment, also known as "mobbing", refers to any display of malicious, deliberate, and unconstructive workplace attitudes and behavior by one or more individuals against another individual or individuals which persists systematically over a period of time, whose aim is to intimidate or demoralize the victim(s) and force them out of the workplace, which is injurious to the victims' professional position, social relationships, and/or physical and psychological health. Such behavior may target one's subordinates, superiors, or peers.

Employees must refrain from any form of workplace mobbing, including but not limited to deliberately and systematically: humiliating, belittling, or ostracizing any colleague; maligning any colleague's character or reputation; bullying any colleague on account of their race, language, religion, gender, or disability.

Any employee who is a victim of psychological harassment should first of all try to remain calm and refrain from directly confronting the perpetrators. They should refer the matter to their superior, unless the harassment is being perpetrated by that superior, in which case they should report the problem to the Ethical Practices Team. Employees are advised to retain copies of all evidence (correspondence, notes,

Employees must refrain from engaging in any form of workplace mobbing that targets any of their colleagues.

refrain from
mobbing

¹ First and second degree relatives: Mother, Father, Child, Brother, Sister, Grandchild, Grandmother, Grandfather

6. Halk GYO's Responsibilities Towards Its Employees

personal space

Personal space begins at 50 cm from an individual and extends to the distance of one meter in every direction. People who know each other and be friends maintain this space at the workplace and invitations.

message, emails, etc.) capable of supporting their claim of being the target of harassment.

6.5. Protection of Personal Space

Maintaining a sufficient amount of interpersonal space in the workplace is important for employees' ability to perform their jobs comfortably and effectively. As a rule, one square meter is considered to be a reasonable amount of space for each employee to work in and to call their own. This is their "personal space". This interpersonal distance between employees is an essential feature of Halk GYO's workplace culture and needs to be observed. Care should be given to respecting employees' personal space so as not to cause them discomfort not only inside but also in places outside Halk GYO where they are engaged in Halk GYO's work.

The space less than 50 cm immediately around an individual is their "private space". While intimate acquaintances like family members and close friends may be admitted to one's private space, it should not be encroached upon by others. Employees who feel that their private space is constantly and deliberately being violated by other employees and who are upset by this may report the situation to the Ethical Practices Team by email on etik@halkgyo.com.tr.

6.6. Occupational Health & Safety

Providing a workplace environment that is safe and secure according to the nature of the work being performed in it is a component of Halk GYO's human resources policy. As required by the Occupational Health & Safety Act (Statute 6331), Halk GYO strives to:

- Prevent employees from having accidents at work;
Provide a workplace environment that will minimize the risks of work-related illnesses;
- Maximize employees' social, psychological, and physical wellbeing by making workplace conditions more conducive to their health;
- Protect employees against any harmful effects arising from the workplace environment, make employees and their work compatible with each other, safeguard the wellbeing of customers and visitors while they are on Halk GYO's premises;
Take all necessary measures to deal with issues that are deemed to be unsafe or to have health-related risks.

As required by Statute 6331, an Occupational Health & Safety Committee has been set up at Halk GYO. Employees should be mindful of the health and safety of their colleagues and of customers and visitors while on Halk GYO's premises as well as their own and they should report any situations that they feel may have safety and/or health risks to the Human Resources Department (OHS Committee on isg@halkgyo.com.tr)

7. Anti-corruption Policy

Employees must comply with Halk GYO's anti-corruption policy. The Türkiye Halk Gayrimenkul Yatırım Ortaklığı A.Ş. Anti-Corruption Policy was approved by the Board of Directors pursuant to resolution 00-000 dated 00 September 2019 and is published on Halk GYO's corporate website.

mandatory
compliance

8. Code of Ethics Implementation

The Board of Directors is responsible for determining and Hak GYO's Code of Ethics. Implementation of the Code of Ethics is the responsibility of the Human Resources Department (Ethical Practices Team)

training

Code of Ethics applies to all full-time and part-time personnel up to and including members of senior management.

Extraordinary cases involving the implementation of the Code of Ethics must be reported to the Ethical Practices Team for their consideration.

8.1. Code of Ethics Training

An e-announcement concerning the Code of Ethics is sent out annual to the entire organization.

E-training resources concerning the Code of Ethics and related issues are available for all employees. Such training is mandatory for newly-hired personnel and for personnel seeking a promotion. Additional training requirements requests should be sent to the relevant department for consideration.

8. Code of Ethics Implementations

code of ethics violations

Employees who are aware of violations of Code of Ethics and ethical standards but fail to duly report them will be considered to be in breach themselves.

8.2. Reporting Code of Ethics Violations

Every employee who becomes aware of any violation of this Policy must notify:

- i. Their immediate supervisor, unless they are certain that is not an appropriate respondent, in which case
- ii. The Ethical Practices Team (etik@halkgyo.com.tr), unless they are certain that is not an appropriate respondent, in which case
- iii. The Halk Gayrimenkul Yatırım Ortaklığı. Corporate Governance Committee.

8.3. Enforcement

The circumstances of any employee who is ascertained to have violated the Code of Ethics will be considered within the framework of Halk GYO's Internal Control System and action will be taken accordingly. Employees who are aware of Code of Ethics violations but fail to duly report them will be considered to be in breach themselves and therefore subject to such disciplinary action as may be appropriate.

9. Execution and Review

The Halk Gayrimenkul Yatırım Ortaklığı. Code of Ethics was approved by the Board of Directors pursuant to resolution 203-385 dated 19 September 2019. Ethical Principles Board (Human Resources Deputy General Manager, Human Resources and Administrative Affairs Manager, Legal Counseling Staff (Lawyer), Internal Audit Risk Management and Compliance Manager and Corporate Communications and Investor Relations Manager) responsible for executing the Halk Gayrimenkul Yatırım Ortaklığı. Code of Ethics on behalf of the Board of Directors.

