

LOGO YAZILIM SANAYİ VE TİCARET A.Ş.
CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS

Logo Yazılım Sanayi ve Ticaret A.Ş. (“**LOGO**”) is a well-established company, where ethical rules constitute one of the main pillars of its corporate culture and ensuring compliance with ethical values is a prerequisite for all its operations. Fairness, sense of responsibility and respect for rights are essential principles in all of LOGO’s relationships with its employees, suppliers, solution partners, business partners, customers, investors, and other stakeholders, as well as with the public in general.

As a corporate citizen, LOGO recognizes its role in social and economic life and takes into consideration social and economic development goals in all its operations. LOGO also expects and encourages others to adopt these principles, which involve all third parties with whom it cooperates or from whom it receives services, including consultants, suppliers, solution partners, business partners, and contractors (“**Suppliers**”).

In this context, this Ethical Code of Conduct Guidebook (“**Guidebook**”) prepared on the basis of transparency, fairness and sense of responsibility regulates ethical rules, which apply to all Suppliers doing business with LOGO. The Suppliers shall comply not only with this Guidebook but also with all regulations applicable to them and ensure that their contractors and employees also follow these rules.

LOGO reserves the right to investigate or request information from the Suppliers, to identify if the Guidebook is properly followed by them or not and may request from Suppliers that the relevant training is provided to their employees and contractors.

A. COMPLIANCE WITH REGULATIONS AND LAW

The Suppliers shall comply with all statutes, acts, laws, bylaws, communiqués, guidelines, and other types of legislation including international conventions and official regulations, which are in force and/or applicable to their operations. The Suppliers are not entitled to act on behalf of LOGO against any applicable law or official regulation, and LOGO does not expect them to conduct any behavior in violation of applicable laws or regulations.

B. ANTI-CORRUPTION AND COMPETITION REGULATIONS

The Suppliers shall comply with all anticorruption and anti-money laundering regulations applicable notably in Turkey, in the countries where they operate, and in foreign countries. The

Suppliers are not authorized to make a statement, provide assurance, or enter into commitment, or act in any other way, which would be binding for LOGO.

The Suppliers, their representatives or employees, are not allowed to, directly or indirectly through a third party, give or offer bribe, commission, gift or a valuable item to any government official, public employee, representative of an international organization, customer or prospective customer or their employees or anyone else, reimburse or make an offer in this regard to these persons with the aim of taking or realizing a business opportunity, where LOGO is concerned in any form, or influencing a decision or gaining an unlawful advantage thereto. The Suppliers shall also ensure that the expenses they make or made on behalf of them in relation to their activities (e.g., gifts, business meals or business trips) are in accordance with the ordinary course of things and they shall refrain from bribery or any other improper action.

Local and foreign legislation regulating the Competition Law, particularly the Law on the Protection of Competition aims to protect the end users and consumers, as well as ensure that the commercial actors in the relevant market operate in a fair and lawful manner. Compliance with these laws constitutes one of the top priorities of LOGO. Likewise, the Suppliers shall follow all kinds of local and foreign laws on the protection of competition.

C. EXPORT REGULATIONS

The Suppliers are obliged to comply with the rules and laws on the use of the Internet, all national and international regulations in force, including among others, the laws on exports, regulations and codes applicable in the Republic of Turkey, the USA, the US OFAC, the UK, and the EU. LOGO products or services cannot be used by the entities or exported to the countries, which are prohibited according to these regulations.

D. CAPITAL MARKETS REGULATIONS

The Suppliers accept and undertake to comply with the regulations on insider trading and all other applicable capital market regulations for all sorts of capital market products and securities, particularly for the securities issued by LOGO. In case a Supplier has an insider information during a project carried out with LOGO or LOGO customers, it shall use such information solely for the designated purpose and for no other purposes, and such information cannot be disclosed to third parties. This limitation applies also to the employees, partners, friends, and family members of the Supplier.

E. REGULATIONS ON HUMAN RIGHTS AND LABOR LAW

The Suppliers shall not only respect and comply with the human rights specified in the Universal Declaration of Human Rights, but also follow the labor legislation, occupational health and safety regulations, international treaties, and the regulations of the International Labour Organization (ILO). The Suppliers are obliged to treat all employees objectively, fairly, and in an unprejudiced manner, exercise due care to ensure a safe and productive work environment for the employees and provide equal opportunity and avoid discrimination based on race, religion, gender, duty, or title both in recruitment and career planning. The Suppliers shall protect health and safety of their employees, subcontractors and third parties against the threats arising from work related activities. The Suppliers shall exercise due care to administer the rights of employees, promptly and completely, stemming from the relevant regulations. The Suppliers shall also comply with the fundamental principles such as abolition of child labor, elimination of discrimination, observation of regular workhours, and freedom of association.

F. ENVIRONMENTAL AND SOCIAL RESPONSIBILITIES

The Suppliers shall act in accordance with social interest and environmental awareness in their operations and aim to apply high standards in terms of environmental consciousness. The Suppliers shall avoid violation of environmental rules, which may be harmful for the health or rights of the people in the region where they operate, comply with all environmental regulations in force, aim to minimize the adverse impact of their activities on the environment and take the necessary measures to avoid environmental pollution. The Suppliers shall also minimize the use of natural resources, develop a sustainability policy, and strive to minimize their plastic footprint.

G. FINANCIAL INTEGRITY AND LAWFUL RECORDS

All financial reports, settlements, accounts, and commercial records of the Suppliers shall be complete and represent the truth about their operations.

H. CONFLICT OF INTEREST

All circumstances, which may prevent the Suppliers from operating in an objective manner, particularly in those cases where the individual interests of a Supplier conflicts with those of LOGO or its related parties, constitute a *conflict of interest*. LOGO aims to avoid all sorts of activities, which may infer a conflict of interest in relation to Suppliers' activities. Therefore, the Suppliers shall exercise due care to refrain from any action, which may result in a conflict of interest. If still a conflict or a potential conflict of interest occurs, the Supplier shall immediately notify LOGO.

I. CONFIDENTIALITY AND PERSONAL DATA

The Suppliers shall comply with the Law on Protection of Personal Data, and all other related laws, regulations, and bylaws in force, the decisions and guidelines of Personal Data Protection Authority, regulations on electronic commerce, trade secrets and all other relevant regulations.

The Suppliers shall exercise due care to protect the confidential information of LOGO and LOGO customers at least as much as their own confidential information. They shall keep the confidential information secret, disclose them only to the relevant employees and shall not transfer them to third parties and not use or duplicate the confidential information for a purpose other than the designated purpose.

J. INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

The Suppliers shall not violate, directly or indirectly, intellectual and industrial property rights in relation to LOGO brands, software, services or products, intellectual and industrial property rights of third parties, including LOGO customers and shall comply with all applicable regulations on intellectual and industrial property rights.