

LOGO YAZILIM SANAYI VE TICARET A.S.

CODE OF ETHICS

Logo is a well-established organization which regards commitment to ethical values as a prerequisite for all its activities, and code of ethics as one of the foundation stones of its corporate culture.

Integrity, responsibility, and respect for individual rights are fundamental to the company's affairs with its employees, suppliers, customers, shareholders and all other stakeholders. The Company is aware of its social and economic roles as a corporate citizen and takes economic and social development into account while carrying out its operations.

In this framework, ethical principles our company, that embraces the Corporate Governance Principles, are defined as follows:

Integrity

Integrity is essential to all internal and external affairs and processes of the organization.

Confidentiality

All employees are obliged to keep confidential any information of which they are aware of regarding related parties and other employees. This information shall be used only in compliance with laws and regulations and shared only with authorized persons. This liability shall continue even after the termination of an employee's connection with the company.

All information and documents, trade secrets, financial and other information not disclosed to the public, personnel information, and confidential information included in the agreements signed with third parties are treated as trade secrets to be protected.

Logo shows the ultimate attention to the protection of personal information of all stakeholders. The company does not interfere with the personal lives of its employees. Personal information of staff members shall be used only in case of necessity by authorized persons and within the limits of pre-defined authority.

All official statements shall be simultaneously disclosed to the company's investors, partners, and the public by the authorized persons, in an accurate and understandable manner and in accordance with the principles of equality.

The company shall take the necessary measures to protect all documents and confidential information that employees access due to their positions or in performing their tasks, even after termination of the employment relationship. The company signs non-disclosure agreements with lawyers, independent auditors, tax advisors, credit rating agencies, and other service providers who have access to company information for business purposes.

Conflict of Interest

Possible instances of conflict between individual interests and the interests of the company or its related parties shall be monitored and avoided. Employees must prioritize the interests of the organization above anything else and avoid any action or behavior in fulfilling their responsibilities that could serve their personal interest or the interests of their relatives, using the organization's resources or reputation. Company employees shall make the utmost effort to avoid abusing the organization's resources and to protect the name and reputation of the Company.

Our Responsibilities

The Company shall pay the maximum attention to fulfilling its responsibilities, which are listed below, towards its customers, employees, shareholders, suppliers and business partners, competitors, environment, all its stakeholders and society.

Responsibility for Compliance with Laws and Regulations

The Company, its employees and contractors are obliged to carry out all activities in accordance with the laws and legislations of the country where they operate in, both in-country and abroad. It is forbidden for the Company's employees and contractors to make financial or in-kind political donations or contributions on behalf of the Company in any of the markets they operate.

All forms of bribery are prohibited, under any name.

It is forbidden to conduct payments of any kind to public officials to facilitate and speed up Company's operations.

Abuse of position by the employee for private interests is considered corruption and is prohibited.

Information, documents, and records regarding these operations shall be kept on a regular basis, shall be complete and safely stored. Any type of report, presentation, financial statement, or explanatory notes to be disclosed to the public or presented to authorities by the company shall be prepared accurately and transparently with maximum attention to laws, regulations, and company policies.

Responsibilities Toward Customers

The employees are aware of their responsibilities to meet the expectations of customers and satisfy them with high quality of service. Customers shall be served professionally with commitment to the principles of integrity and fairness. The employees shall strive to understand the needs of customers and assist them with motivation and respect.

Responsibilities Toward Employees

The Company shall treat all employees impartially, fairly, and without prejudice and create a safe, healthy, and efficient work environment. The company provides equal employment opportunities and does not discriminate based on race, religion, gender, task, or title in hiring or career development. The Company seeks to provide personal development opportunities that positively affect employee performance. Employees' rights arising from relevant regulations shall be fulfilled promptly and accurately.

Responsibilities Toward Shareholders

The Company's operations shall aim to increase the value of the Company. Due care shall be taken to strike an optimum balance between profitability and risk management. The Company's operations shall be carried out within the framework of transparency, accountability, sustainability, and integrity. The responsibility of disclosure to shareholders shall be fulfilled accordingly and within the framework of relevant laws and regulations. The Company's resources shall be used in an efficient and effective manner; waste shall be avoided. An optimum balance shall be maintained between short-term goals and long-term performance. The Board members shall not give into demands that are against shareholders' interests, and shall not assume financial benefits.

Responsibilities Toward Suppliers and Business Partners

The Company shall treat its suppliers and business partners with integrity, respect, and in good faith, and shall comply with its legal obligations.

Responsibilities Toward Competitors

Logo takes the utmost care to ensure the development of the sectors in which it operates, to pursue common interests together with all players in those sectors and to protect trust in those sectors. The company avoids unfair competition and acts within the framework of ethical rules and fair competition principles.

Responsibilities Toward Environment and Society

The company operated with awareness toward social benefit and environmental awareness, and aims to reach the highest standards of environmental awareness. The company avoids violation of environmental rules that might damage the health or rights of employees, customers, and people living in the areas where it operates. In all its activities, the company aims to minimize potential adverse effects of its operations on the environment and takes measures to prevent pollution. Consumption of natural resources shall be kept to minimum possible levels. Within the framework of its social responsibilities, Logo supports education and charity campaigns and social responsibility projects, as well as activities to increase environmental and cultural awareness and benefit the public. The Company shall be sensitive to the traditions and cultures of the countries in which it operates, adapt to social structures, and avoid any action that may have a negative impact on the social environment.

ACCEPTING AND GIVING GIFTS

Giving and accepting gifts by the employees and contractors during their duties or related to their duties has been restricted within the scope of the rules set forth by the Board of Directors.

APPLICATION AND COMMUNICATION OF CODE OF ETHICS

The Code of Ethics and the amendments to it are announced to employees by the Human Resources, and are also included in the training programs. The information about education is included in the Sustainability Report. The Code of Ethics is communicated to the contractors, suppliers and agents. Reports regarding possible cases of bribery and corruption are submitted to a system, which ensures the privacy of the submitter. The Company shall not retaliate against or punish employees who refuse to bribe. Violation of the rules regarding bribery and corruption may result in termination of contracts.

ROLES OF ETHICS COMMITTEE, THE EXECUTIVE COMMITTEE AND THE BOARD OF DIRECTORS IN THE PROCESSES CONCERNING CODE OF ETHICS

The Ethics Committee is set up by the Board of Directors, and is composed of independent members from each of the Audit and Corporate Governance Committees, a member of the Executive Committee responsible for the Human Resources, a legal advisor and an employee representative.

The Company's Code of Ethics is established by the Ethics Committee and enters into force upon being approved by the Board of Directors.

Reports by the Audit and Corporate Governance Committees are also assessed by the Ethics Committee in scope of the Code of Ethics.

The report prepared by the Human Resources regarding the implementation of the Code of Ethics is assessed by the Ethics Committee.

The Ethics Committee assesses the totality of information, findings and recommendations included in above mentioned reports, and prepares an Ethics Report to present to the Board of Directors. The report includes results of the assessment as well as information, findings and recommendations. A copy of the report is also submitted to the Executive Committee.

The Executive Committee implements the practices within its authority and submits its opinions on matters that are within the authority of the Board of Directors to the Board.

The Board of Directors monitors the implementation, inspection and auditing of the Code of Ethics within the scope of the reports and processes specified within the Code of Ethics.

The Board of Directors commits to supporting implementation of the Code of Ethics and the fight against bribery.

The aforementioned Code of Ethics shall enter into force after being approved and announced by the Board of Directors.