

BİM BİRLEŞİK MAĞAZALAR A.Ş

ETHICAL PRINCIPLES

A. PURPOSE AND SCOPE

BİM Birleşik Mağazalar A.Ş (The Company) continues its activities with an honest, reliable and fair approach towards all its stakeholders. Accordingly, the Company has established the ethical principles in this document in order to create a common corporate culture on business ethics and to guide all employees and stakeholders. The principles mentioned here may not cover all scenarios that may be encountered in business life. In these cases, the Company's other policies and procedures or the assistance of other employees should be sought. However, the Company fully believes that its employees will make the most appropriate and ethical decisions within the framework of common sense.

B. BASIC ETHICAL PRINCIPLES

1-Honesty and Trust

All employees are obliged to protect the reputation of the Company, which has established itself in the sector as an honest and safe company. Employees act in a professional, fair and honest manner in all business relations and fulfill their duties within the framework of basic moral and humanitarian values.

2- Legal Responsibilities

Company employees act in accordance with the legislation in force in all business areas. The company adopts a zero-tolerance approach against illegal activities to be carried out for personal benefit or on behalf of the company.

3- Responsibility to Customers

The company offers high quality and safe products to its customers at the most affordable prices, and prioritizes human health and the reliability of the products sold above any financial gain, putting the customer's interests ahead of short-term high profits. The quality assurance department tests the compliance of the products with legal obligations and BİM criteria within the framework of determined policies.

The company develops responsible marketing processes for customer groups that are relatively vulnerable to product marketing abuse, such as children.

4- Relations with the Employees

The company offers equal opportunities to all its employees and employee candidates, rejects all kinds of favoritism among employees, and does not discriminate in human resources policies on any subject such as religion, language, race and gender. It establishes mechanisms to prevent or report the practices of psychological violence (mobbing) in the workplace and does not tolerate the exposure of employees to incidents such as ill-treatment, intimidation and verbal or physical harassment. The company takes the necessary measures in accordance with the relevant legislation and industry standards in order to provide a healthy and safe work environment to its employees.

Company employees cannot make statements on behalf of the company in the press and broadcasting institutions, organizations, and social media, unless they are assigned within the scope of the Information Policy. In addition, employees should not post on social media and similar channels that would constitute a crime or damage the company's reputation.

There are no limitations that prevent employees from engaging in political or other social formations or participating in activities. However, except in cases where there is a contrary provision in the relevant laws and regulations, these activities must be outside of working hours and the resources and the name of the company should not be used. In addition, no issues related to these activities should be shared or brought to the agenda in the working environment.

Employees should make sure that their personal investments or pursuits outside of business activities do not interfere with or hinder the performance of their current duties.

Executives and senior officers who are in a position to make a hiring decision cannot hire their relatives without approval of their senior manager.

In the company, it is essential that the employees who have a spouse and third degree relatives (including in-laws) do not have superior-subordinate relations with each other, do not work in the same department or take part in the same decision-making mechanisms.

5- Responsibility towards Shareholders

It is among the Company's main priorities to make sure that the issues that need to be enclosed to the shareholders and the public about the Company are made on time and correctly and synchronously. Informing the shareholders and the public is managed transparently within the scope of the Company Disclosure Policy.

6- Insider Trading

It is possible for employees and their close family members to carry out investment transactions with BIM shares in the stock exchange, under the conditions specified in the Capital Markets Board regulations. Employees are aware that it is a legal crime for them and their close family members to try to obtain any commercial interest (insider trading), including directly or indirectly trading shares from stock exchanges, by using all kinds of confidential information belonging to the Company or by giving them to third parties, and they certainly do not attempt to do so.

7- Resigned Employees being in a Business Relation with the Company

Ex-employees and their close family members can not do business with the Company as a seller, contractor, consultancy, brokerage, representative, dealership or similar ways by establishing a company or by becoming a partner in a company. Members of The Executive Board has the authority to evaluate and approve exceptional cases.

8- Relations with the Suppliers and Business Partners

The Company acts professionally, fairly and honestly in all its relations with suppliers and business partners; does not provide commercial advantages through illegal or unethical means and does not engage in activities that would violate the competition law.

The Company supplies its products from companies with a safe and healthy production environment and regularly checks whether these standards are maintained. The Company supports improvements in the policies and practices of companies in the supply chain, including health and safety.

The Company expects all business partners to act in accordance with applicable legislation.

If the employees or their relatives have an interest in another company with which they have a commercial relationship, they inform their relevant senior manager.

9- Responsibility to Environment and Society

The Company takes the necessary measures to keep the environmental impact of its activities at a minimum and to comply with the relevant legislation and industry standards. It focuses on energy efficiency and invests in renewable energy to combat climate change. Within the scope of waste management, the Company works to prevent packaging and food waste. It also works with the aim of protecting the environment and contributes to the awareness of consumers.

The Company contributes to society through donations, volunteering and philanthropy activities within the framework of its Donation and Aid Policy and responsible citizenship.

10- Protection of Personal Data

The Company takes the necessary measures to protect the personal data of its customers and other personal data obtained during its activities.

11- Fight against Bribery and Corruption

The Company has a zero-tolerance approach against bribery and corruption. By this means it is prohibited under any circumstances to accept or give bribe and corruption in the Company. It is essential that employees do not accept gifts from persons, companies and institutions with whom the Company does business or may have a business relationship. Employees should avoid conflicts of interest, and should promptly report all relevant facts to their managers if they believe there is a potential conflict of interest.

*For detailed information, refer to the “**Anti-Bribery and Anti-Corruption Policy**”.*

C. COMPLIANCE WITH ETHICAL PRINCIPLES AND REPORTING OF NON-COMPLIANCE

All company employees are obliged to act in line with the principles contained in this document in business life and to notify the relevant manager of situations that they think are contrary to these principles. This obligation includes employees to be in good faith and not to make false accusations when reporting. The Company undertakes to take the necessary measures to prevent retaliation by any Employee, Manager and Business Partner against its employees who make a report. The Company undertakes that the notifications made in this context will be kept confidential unless otherwise required by law and that the highest level of confidentiality will always be provided.

*For detailed information, refer to “**Non-compliance Reporting Policy**”*