

GLOBAL INVESTMENT HOLDINGS

HUMAN RIGHTS POLICY

Revision	Date of Release
V.2	June 2019

GLOBAL INVESTMENT HOLDINGS

HUMAN RIGHTS POLICY

June 2019 V.2

1. PURPOSE and SCOPE

INTRODUCTION

Global Yatırım Holding Anonim Şirketi ("GIH") and its affiliates (unless stated otherwise, "Company" covers GIH and all its affiliates (subsidiaries, jointly controlled entities and associates)) commits to lead all activities in compliance with the Universal Declaration of Human Rights.

According to this declaration; all peoples and all nations, to the end that every individual and every organ of society, will strive for progressive measures in training and education to promote respect for human rights and freedoms and by progressive measures, nationally and internationally, to secure their universal and effective recognition and observance, both among the peoples of UN Member States themselves and among the peoples of territories under their jurisdiction.

The Company works toward minimizing its environmental and social risks in its activities. For this purpose, in accordance with the Guiding Principles on Business and Human Rights framework formed by the United National Human Rights Council, the Company aims to refrain from causing negative impact, to intervene when such impacts occur and to prevent negative impact of its activities, products or services, even if the Company does not directly contribute to such impacts on human rights.

PURPOSE

The purpose of this Human Rights Policy is to declare our respect for the fundamental human rights in our activities as a company, show the value we place on our employees, as well as to explain our commitments and communication channels.

SCOPE

As the Company, we expect all our affiliates and joint ventures to act in compliance with the Human Rights Policy. This Human Rights Policy covers our fundamental principles on human rights.

This Human Rights Policy covers the following:

- The Company's Board Members,
- Company executives and employees,
- The Company's subsidiaries, jointly controlled entities and affiliates including their employees,
- The third-party service provider companies, consultants, lawyers, persons and institutions working for or with the Company, including external auditors, contractors, agencies and similar parties.

This Human Rights Policy is an integral part of the Anti-Bribery and Corruption Policy, Code of Ethical Conduct, Environmental Policy, Occupational Health and Safety and employee code of conduct regulations, directives and/or policies that have been approved by the Board of Directors and disclosed to public.

2. DEFINITIONS

Following are brief definitions for the special terms, phrases and abbreviations used in this Human Rights Policy:

GIH: Global Yatırım Holding Anonim Şirketi (Global Investment Holdings)

Company: Global Investment Holdings and its affiliated companies (subsidiaries, associates, joint ventures having 50% or more share in the management)

Senior Management: Members of the Company's Board of Directors and the managers.

Employees: Employees of the Company.

Service Provider: Companies (suppliers, agencies, contractors, clients etc.) offering services to the Company and/or receiving services from the Company, including their employees.

GLOBAL INVESTMENT HOLDINGS

HUMAN RIGHTS POLICY

June 2019 V.2

3. RESPONSIBILITIES

Board of Directors

The Board of Directors is responsible of approving and -in case of non-compliance- notifying, reviewing and supervising the determination of sanction mechanisms of the Human Rights Policy.

Senior Management

Senior Management is responsible for preparing, developing, executing and updating the Human Rights Policy. Senior Management reports to the Board of Directors about formation, publication, necessary updates and termination of the Human Rights Policy.

The implementation and supervision of the practices related to the Human Rights Policy is under the liability of the Senior Management. Senior Management is responsible for taking the necessary measures to ensure employee, supplier and contractor compliance and for notifying the Compliance and Internal Audit Department to review issues against this Policy.

Senior management consists of the General Manager and Department Heads/Directors.

Legal Department

The Legal Department evaluates the Human Rights Policy for updates and improvements when deemed necessary and makes recommendations to Senior Management.

Employees

Employees are responsible for

- adhering to and acting in line with the Company's policy, regulations and procedures,
- working in compliance with the legislation in force,
- notifying the Compliance and Internal Audit Department when facing a behaviour, activity or practice contrary to this document.

Suppliers and Business Partnerships

Suppliers and Business Partnerships must comply with the principles declared in this Human Rights Policy, as well as other related regulations. Our relations with individuals and institutions that fail to respect these principles will be terminated. Subcontractors, suppliers, clients, joint ventures and other partners are expected to respect to the human rights while doing business. Compliance audits of the implementation of this Human Rights Policy and related legislation are essential.

Corporate Communications Department

This Policy is published in the corporate portal and its publication is under the responsibility of the Corporate Communications Department.

Human Resources Department

The Human Resources Department is responsible for distribution of this Policy to all employees within the Company.

Investor Relations Department

Within the framework of this Policy, the Investor Relations Department is responsible for organising the relations between the Company and corporate investors, portfolio managers, analysts, current and potential shareholders and the simultaneous and transparent public disclosure of practices to all parties concerned. The Investor Relations Department is responsible for the dissemination of the prepared document on the company website.

GLOBAL INVESTMENT HOLDINGS

HUMAN RIGHTS POLICY

June 2019 V.2

4. OUR COMMITMENTS

As the Company, we adopt and comply with the human rights regulations defined in the Constitution of the Republic of Turkey, the Universal Declaration of Human Rights (UDHR), the International Labor Organization's Fundamental Conventions ("ILO"), the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, the OECD Guidelines for Multinational Enterprises and the international declarations, fundamental rules, conventions and principles where Republic of Turkey is a signatory, in all our activities. In this respect, we give importance to respecting the rights of our employees.

As the Company, to support our Human Rights Policy, we develop necessary working methods in order to create a work atmosphere where human rights are respected and complicity in activities that might directly or indirectly violate human rights is prohibited. As the Company, in all of our business processes, we are mindful of implementing compliance to the Universal Human Rights Declaration and legislations of countries where we operate.

For this purpose, as the Company;

- We respect and implement the internationally recognized fundamental human rights defined in the Universal Declaration of Human Rights and in Declaration on Fundamental Principles and Rights at Work by ILO, such as non-discrimination, elimination of child labour and forced labour, freedom of association, and rights to collective bargaining and agreements.
- We signed the United Nations Global Compact and we adhere to all of its principles within our Company.
- We started the documentation process to obtain the SA8000 Social Responsibility Standard.
- We work in compliance with all legal requirements and we respect human rights and dignity of everyone.
- We treat our employees equally and offer them equal opportunities regardless of their religion, language, race, age, skin colour, nationality, social background or gender and we do not allow discrimination.
- We perform our human resource selection, recruitment, placement, training and compensation processes by taking into account our employees' qualification, performance, talent and experiences.
- We are sensitive about offering equal and competitive compensation aligned with market conditions to our employees.
- We guarantee to provide our employees a secure workplace that is far from any kind of mistreatment, discrimination, harassment, exploitation, abuse and violence.
- We develop a workplace setting in line with the Occupational Health and Safety Legislation and we value raising awareness of our employees.
- We support our employees' freedom of association, meeting, assembly and collective bargaining agreements within legally recognized unions.
- We do not accept forced or compulsory labour.
- We do not allow child labour at the Company. We maintain our activities in compliance with the forced labour and child labour articles of the International Labor Organization's Conventions and according to the strictest legislations in the countries we operate.

GLOBAL INVESTMENT HOLDINGS

HUMAN RIGHTS POLICY

June 2019 V.2

- We do not make illegal discrimination and we respect the freedom of expression at the workplace.
- We set preventive rules for protecting the personal information of our employees.
- This Human Rights Policy covering all core labour areas of ILO and the human rights practices laid out in the Code of Ethics are communicated through the Company's internal communication channels and training programs. All of our employees are involved in this communication process globally and participate to the trainings.
- We encourage our contracted suppliers to comply with the principles stated in this policy declaration.
- We respect the rights of local communities that are affected by our activities. We take necessary measures to identify the negative impacts on human rights and to prevent, minimize and/or mitigate them.
- We contact the government authorities in our operation regions or countries, in case the human rights are under risk.
- We respect the rights of the local communities in the regions or countries where we operate.
- We declare that we set target for 100% compliance to our Human Rights Policy until 2017.
- In the case that a violation or complaint arises relating to our Human Rights Policy, we will ensure that an internal inspection according to the Disciplinary Code and Compliance and Internal Audit Code is conducted and we will cooperate in internal audit activities.
- Failure to comply with this Human Rights Policy will be submitted to the Disciplinary Code, and may result in disciplinary penalties or penal proceedings.

5. MONITORING, AUDIT and IMPROVEMENT PROCESS

This Human Rights Policy is reviewed by the **Corporate Governance Committee** at least once a year in certain intervals and the practices are regularly monitored. Matters related to human rights are included in the general risk evaluation processes and risk evaluations are conducted annually.

The Human Rights Policy is part of the Compliance and Internal Audit Department's annual programmes. Compliance and Internal Audit Department presents a sample report of the audit results to the Corporate Governance Committee and contributes to the activities of the Corporate Governance Committee upon its request.

In case there are any gaps and/or risks that arise from the human rights risk and impact evaluations, internal monitoring/control processes or from the stakeholder feedbacks, including the international and local non-governmental organisations, received through open stakeholder dialogue, the Corporate Governance Committee is responsible for improving the process and reviewing the Human Rights Policy.

E-mail address to notify us about issues regarding the Human Rights Policy: etik@global.com.tr. Furthermore, you can reach the contact points listed below.

GLOBAL INVESTMENT HOLDINGS

HUMAN RIGHTS POLICY

June 2019 V.2

6. ENFORCEMENT

This Policy was adopted by the Board of Directors resolution, no:901 and dated 30 May 2016.

CONTACT POINTS

Legal Department:

Uğur Aydın

Telephone: 90(212) 244 60 00

E-mail: ugura@global.com.tr

Compliance and Internal Audit Department:

Mert Taşpolat

Telephone: 90(212) 244 60 00

E-mail: mertt@global.com.tr

Human Resources Department:

Göknıl Akça

Telephone: 90(212) 244 60 00

E-mail: goknila@global.com.tr