OneIngage Ethical Principles

The term “OneIngage” refers to and encompasses OneIngage Pazarlama ve Teknoloji Çözümleri A.Ş., Intechno360 Pazarlama Teknolojileri A.Ş.,Ingage Dijital Pazarlama Hizmetleri A.Ş., OneIngage International Media Marketing ve Technology Solutions FZ-LLC and Digital Panorama Bilgi ve İletişim Teknolojileri Sistem ve Hizmetleri A.Ş

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Message of Management

Dear Colleagues,

Esteemed Stakeholders,

We aim to be the most sensitive to the voice of the customer, the most desired global, new generation marketing consultancy and solutions partner that offers end-to-end services in the fields of media, data, technology and e-commerce in line with the vision we have determined as OneIngage, with the professional human resources trained in the sector.

We have a management approach that is accountable to our business partners, employees, customers, in short, to all our stakeholders, and that we carry out within the framework of transparent, concrete and fair principles.

As we continue to grow by increasing our business verticals, we work on the purpose of existence, culture and values, and we strive to maintain OneIngage's transformation and change.

The change in local and international regulation brought about by globalization makes the adoption of universal approaches more and more of a priority. Our internal operations, working principles and communication are always based on the Code of Ethics, and we adopt a people-oriented and socially conscious approach. Therefore, the adoption and implementation of OneIngage Ethical Principles and Compliance Policies are of great importance as part of our business conduct and working principles.

We accept our main goal to always comply with the laws and ethical rules within the framework of fairness, good faith, honesty, respect, equality and transparency in all our relationships and business processes with the OneIngage Code of Ethics and related policies. In this respect, I know that you will all be sensitive about the implementation of OneIngage Ethical Principles and Compliance Policies and I would like to thank you for the collaborative environment you have created.

Best regards,

Pınar Ercan Tursun

General Manager

1. Our Core Values

OneIngage is guided by the goals and principles of the late Vehbi Koç, and we fulfill our duties in the light of these principles.

Integrity, honesty, responsibility, trust and respect are our core values that guide our decisions and actions. As all OneIngage employees and management, we exhibit attitudes and behaviors that will ensure cultural integrity within the framework of these values.

2. Our Ethical Principles - Why and For Whom?

OneIngage Code of Ethics has been created to guide OneIngage managers, employees and our Business Partners (suppliers, customers, contractors, consultants, all kinds of representatives acting on behalf and account of the company, etc.). All OneIngage employees are required to comply with the OneIngage Code of Ethics, as well as the legal regulations of the countries in which the company operates or has a business relationship. OneIngage also takes necessary measures to ensure that its Business Partners comply with the OneIngage Code of Ethics and its affiliated policies, to the extent relevant.

While compliance with the OneIngage Code of Ethics is the duty of all OneIngage employees, OneIngage senior management is expected to show leadership in this regard.

Our Code of Ethics is based on the following three operational pillars of the Compliance Program:

• Prevention - We aim to embed and promote a culture of honest work at all levels in all countries where we have operations.

• Identification - We encourage our people to report non-conformities and be a voice for our values.

• Response - We report violations, investigate them in a proper and fair manner, impose relevant sanctions if necessary, and work to continuously develop and improve our own system.

In cases that are not explicitly included in the OneIngage Code of Ethics or policies, we act in accordance with the spirit of our Code of Ethics and in line with fundamental ethical values. When in doubt about anything, we consult OneIngage's Legal Counsel and Compliance Officer.

For detailed information, please review the OneIngage Compliance Policy.

3. Our Principles and Policies

3.1 Respect for Human Rights

As OneIngage, we aim to be the ideal organization that will ensure sustainable growth, create added value, consist of the most successful and competent professionals and that everyone is proud to be a part of.

We embrace the United Nations Declaration of Human Rights and aim to ensure that our Code of Ethics and related policies are in line with these principles.

We take great care to treat all our employees equally and fairly, and we expect the same attitude from all our stakeholders.

- We look for suitability for the job and merit as the only criteria in recruitment, regardless of gender, sexual orientation, gender identity, language, religion, race, color, ethnic origin, age, nationality, difference of opinion and assets.
- We reward success through fair and competitive wage policies, effective and objective performance evaluation systems and practices.
- We aim to increase the loyalty of our employees to the company by providing equal opportunities in appointments, promotions, rotations and rewards, regardless of any characteristic of the person mentioned above.
- We provide equal opportunities for the training, guidance and development of our employees.
- We create a transparent and mutually respectful working environment where cooperation and solidarity are paramount.
- We do not tolerate any form of discrimination.
- We provide our employees with clean, healthy and safe working conditions,
- We respect the unionization and collective bargaining rights of our employees.
- We do not tolerate any form of violence and harassment.
- We do not tolerate child labor, slavery, human trafficking and forced labor.
- We use company resources responsibly.

3.2 Compliance with the Law Under All Circumstances

In every country where we do business, we act in accordance with the law, and where the law is unclear, we act in accordance with the OneIngage Code of Ethics and, where necessary, in consultation with the competent authorities.

At OneIngage, we see intellectual and industrial property rights as an important tool for achieving sustainable competitive advantage and the best business results. In this context, our basic principles in this area are to protect our distinctive innovations and strong brands in the markets where we do business, to create value from our portfolio, to be open to collaborations in this context and to respect the intellectual and industrial property rights of third parties.

We act in accordance with legal regulations in the processing of personal data and take the necessary measures. In this context, as OneIngage, we act in accordance with the local and international legislation we are subject to and the principles determined in the processing of personal data under all circumstances.

We record all our commercial activities and records in a complete and clear manner in accordance with the applicable legislation, and ensure that agreements with third parties are clear and comprehensible in accordance with the legislation, our Code of Ethics and policies.

We provide our employees with the necessary training, but we expect them to know when to seek support from their managers or Legal Counsel and Compliance Officer.

We recognize that failure to comply with the law will affect not only the employee or department concerned, but also OneIngage and OneIngage Shareholders. We recognize that they may need to comply with local legislation as well as international regulations under OneIngage's contractual obligations. We recognize that non-compliance can have many consequences, including administrative fines, and that individuals can be held personally liable.

3. 3 Anti-Bribery and Anti-Corruption

At OneIngage, we conduct everything we do and every decision we make in accordance with the highest ethical standards. In line with the United Nations Global Compact, we resolutely take the necessary measures to combat corruption and bribery.

In addition, OneIngage complies with the relevant legal regulations in force in the Republic of Türkiye and all other legal regulations that OneIngage is required to comply with, including but not limited to the UK Anti-Bribery Law and the US Bribery Prevention and Foreign Corrupt Practices Act.

In line with our Code of Ethics and related policies, it is strictly prohibited to provide an interest to domestic or foreign government officials and other third parties, regardless of whether they are public officials, to obtain an illegitimate benefit. This prohibition includes providing, offering, promising or accepting anything of value to, or accepting anything of value from, any third party directly or indirectly related to OneIngage's business activities for the purpose of influencing their decisions.

All our employees are obliged to comply with local and relevant international anti-bribery and anti-corruption legislation and relevant OneIngage policies and we expect all our Business Partners to act in accordance with the relevant regulations.

3.4 Gift and Hospitality

Our gift and hospitality practices within OneIngage must comply with the following rules:

- It must comply with the legislation.
- It must be within the limits set out in policies and procedures, within reasonable amounts and must be a rare practice.
- It must be symbolic and nominal.
- It must not be cash and cash equivalents.
- It must be recorded openly and transparently in our books and records.
- It must be done in accordance with accepted commercial practices.
- It must not affect the decision-making process in any of our business relationships.
- It must be of a nature that would not harm OneIngage's reputation if it were to become publicly known.

OneIngage avoids transactions and activities that may be considered as gift and hospitality practices with public subsidiaries or affiliates, public institutions or publicly owned institutions, and any institution that has administrative and financial autonomy but has public legal personality.

3.5 Preventing Conflicts of Interest

As OneIngage employees, in the decisions we will make according to our roles and responsibilities, we take care not to be in any situation that may prevent us from being impartial, that may benefit ourselves or our relatives, or that may create the impression of such a situation, or that may create the potential for such a situation, where our personal interests and our responsibilities to OneIngage may conflict.

In case we are in a situation that may be considered a conflict of interest, we share the matter with our managers and Legal Counsel and Compliance Officer to avoid any damage that this situation may cause to us and our company. To avoid potential conflict of interest situations:

- We refrain from abusing our titles or authorities to obtain benefits for ourselves or our relatives.
- We take due care to ensure that our personal investments outside of work do not prevent us from devoting the time and attention necessary to fulfill our duties at OneIngage and do not create a conflict of interest.
- In the event that we are related or otherwise close to the persons in the primary decision-making position in our Business Partners' business activities related to OneIngage, we inform our manager and OneIngage's Legal Counsel and Compliance Officer.

3.6 Compliance with Economic Sanctions and Export Controls

The process of integrating the proceeds of illegitimate means into the financial system in order to make it appear as if they were earned through legitimate means is called laundering of proceeds of crime. As OneIngage, in compliance with local and international legislation, we avoid any commercial transactions that may be seen as laundering of proceeds of crime, therefore, before entering into a business relationship with third parties, we conduct the necessary due diligence to get to know the relevant party. As OneIngage, we do not enter into business relations with third parties about whom we do not have sufficient information or about whom there is negative intelligence, or who pose a risk or create suspicion for these and similar reasons.

As a globally operating company, we take effective and necessary measures to comply with regulations related to economic sanctions and export controls.

In this context, we do not establish commercial relations with persons on embargo and sanction lists, and if it is necessary to establish direct or indirect contact, we always obtain approval from OneIngage's Legal Counsel and Compliance Officer before establishing contact.

3.7 Confidentiality

We know that it is prohibited to use or share personal, commercial, financial, technical, legal and/or similar confidential information belonging to our Company, our employees or our Business Partners for the benefit of ourselves or third parties, and we take the necessary measures to protect the confidential information we are aware of as required by our roles and responsibilities.

We use the information we obtain only for the work we are obliged to do as per our job description. We act in accordance with the relevant legislation and our contractual obligations in sharing trade secrets and other confidential information.

We protect the confidential information we obtain even if we leave OneIngage and do not share it with third parties.

3.8 Donations, Sponsorship and Community Investments

We make donations to support social development in the geographies where we operate and sponsor activities in line with our principles. We conduct donation and sponsorship processes in a transparent manner, taking care to ensure that these activities do not conflict with OneIngage values or commercial interests.

We do not donate or sponsor any activity that violates human and animal rights, promotes tobacco, alcohol and drugs, or harms nature. We do not donate to or sponsor the activities of organizations that discriminate on the basis of gender, sexual orientation, gender identity, language, religion, race, color, ethnic origin, age, nationality and difference of opinion.

3.9 Social Investments

We invest in environmental and social issues by developing long-term collaborations in line with the needs of the geography in which we operate. We care that our social investments are in line with our business priorities and that they are realized in cooperation with specialized institutions or individuals.

3.10 Political Activity

We do not donate to political parties, politicians or political candidates. However, we respect and do not limit our employees' voluntary participation in legitimate political activities. OneIngage resources (vehicles, computers, e-mails, etc.) cannot be used for political activities or personal donations for this purpose. Demonstrations, propaganda and similar activities for political purposes are not allowed within the OneIngage working areas.

3.11 Compliance with Competition Law

As OneIngage, we act within the framework of legal regulations and our company policies in all countries where we operate, in a manner befitting our reputation. We do not take part in any practice that would be contrary to the rules of competition law.

Our basic principles under competition law are as follows:

- To comply with regulations related to competition law
- Except for the limits permitted by the legislation, not to engage in agreements and behaviors with competitors or other persons or organizations, directly or indirectly, with the aim of preventing, distorting or restricting competition or that have or may have this effect
- To obtain information on competitors only through methods stipulated by legislation and case law and to use it in all relevant documents by citing the source
- To avoid behaviors that may be considered as abuse for our companies that are in a dominant position in the market in which they operate

- To avoid all kinds of meetings and communications that may lead to the above-mentioned situations or that may be characterized as such in other private or professional meetings and interviews that bring together competitors such as associations, councils, chambers, professional unions meetings and conferences, and fairs attended on behalf of OneIngage
- To deal with issues that may be contrary to competition law within OneIngage with the same care and diligence

3.12 Creating a Healthy and Safe Work Environment

As OneIngage, one of our biggest goals is to create a healthy and safe work environment for our employees and to ensure that our Business Partners such as our agencies and dealers also create such a work environment. For this purpose, we take all kinds of measures and try to increase awareness in this area by providing trainings within the scope of occupational health and safety.

We carry out our activities in a healthy and safe manner without putting our employees, contractors, dealers and the community at risk. To realize this, we use facilities with safe design, work with competent people and prioritize safety in our processes.

At OneIngage, human life comes first and no work is too important to be done without safety and health precautions. Our employees comply with all legal regulations on Occupational Health and Safety and our Group policies and immediately report any unsafe working conditions to our communication channels. We report any accidents, injuries or unhealthy conditions immediately. We identify our emergency scenarios and make appropriate preparations; we know what to do in case of an emergency. We do not come to work under the influence of drugs and alcohol.

3.13 Use of Social Media Accounts

As OneIngage, we continue to take part in social media, which has a strong growth trend in the world and in our country in recent years, in accordance with our OneIngage ethical principles and brand values. We know that personal social media accounts are everyone's private spaces and we respect their sharing preferences.

On the other hand, we recognize the benefits that can be gained from the proper use of social media, but also the significant reputational risks it can bring to OneIngage. For this reason, when sharing on social media, we refrain from sharing content that may cause disagreements and uncertainties on corporate issues, as well as information and photos that violate the privacy rules of companies. In our social media posts, we always ensure that we comply with legal regulations and the OneIngage Code of Ethics and related policies. We know that offensive, devaluing and exclusionary elements of the posts made on social media platforms against OneIngage, its Business Partners, employees and Stakeholders will constitute a violation of OneIngage Ethical Principles and related policies.

3.14 Acting Honestly and Fairly in Relations with Our Stakeholders

Stakeholders refer to all parties affected by OneIngage's activities and whose activities affect OneIngage, and our basic principles in our relations with our stakeholders are stated below:

- We use objective criteria in our selection of suppliers, customers and brands, and we pay attention to be in business relations with parties that attach importance to human rights, take anti-bribery and anti-corruption principles into account and fulfill their legal obligations.
- We keep our communication channels with our stakeholders open and always take their complaints and suggestions into consideration.
- We always comply with confidentiality rules in our visits and audits to our stakeholders.
- We expect all our stakeholders to comply with the relevant laws and regulations at all times.
- We refrain from expressing personal opinions to the public, and when it is necessary to provide information to the public within the scope of the Disclosure Policy, we only make statements on behalf of OneIngage by authorized employees.

We always provide honest and reliable information to the public and media. We do not make statements in press releases that contradict OneIngage's ethical values.

- We protect the rights and interests of shareholders as determined by law.
- We make every effort to create value in return for the resources they provide, and we distribute the resulting profit to shareholders or invest it in accordance with the laws and regulations.
- We ensure that OneIngage is managed within the framework of the principles of trust and integrity that have been in place since its establishment, aiming for sustainable growth and profitability, and utilize the resources and assets of our companies and

4. Voicing Our Concerns

As OneIngage, we know that violations of the legislation and our Code of Ethics threaten the general interests of individuals, companies and society; cause injustice, material and moral damages; and that it is a conscientious duty to inform the competent authorities to end it when such situations occur.

OneIngage places great importance on integrity and accountability in all its dealings. It is our duty to maintain a culture of honesty and respect, and to oppose behavior that may be contrary to OneIngage ethical standards. Therefore, as all employees, we act in accordance with the OneIngage Code of Ethics and our Company's policies. In case of any doubt, we will consult OneIngage's Legal Counsel and Compliance Officer.

To best manage OneIngage's reporting mechanism, those who witness or suspect any misconduct or unethical behavior are expected to raise their concerns. Managers are also required to report any misconduct reported to them to the notice reporting address.

- Notifiable matters include, but are not limited to, the following:
- Crimes such as theft and fraud
- All kinds of discrimination (race, religion, language, color, gender, age, etc.)
- Violation of ethical rules, laws, moral values and legal regulations
- Threat to the safety or health of the community
- Inappropriate use of community equipment
- Fraud in accounting records
- Giving or receiving bribes
- Revealing community secrets
- Laundering of proceeds of crime
- Environmental damage
- Harassment
- Mobbing

You can make your notices and notifications via the link "https://oneingage.com/ihbarbildirim".