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1. SCOPE

This document establishes the basic framework of a Sustainability Management System (SYS) that can be adapted and developed to cover all management processes of our hotel and reveals the policies and practices of our organization.

This document has been prepared for all stakeholders, guests and staff of the hotel. Our system is constantly being developed to suit the size and scope of our hotel.

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2. SUSTAINABLE MANAGEMENT SYSTEM

The basis of our sustainable management system is based on risk analysis. Risk analysis is carried out under the headings of environment, natural disasters, society, culture, economy, quality, human rights, health and security. New headings can be added if necessary.

After the risks are analyzed, we also have a crisis management policy and system that determines what to do if the risks materialize. The annex of this document includes how to conduct risk analysis and crisis management.

SYS includes the implementation of certain policies by all employees on quality, economy, management, environment, culture, human rights, health and safety, setting targets and constantly improving business management processes by monitoring whether the targets are achieved.

If the determined targets are achieved, new targets are determined. If not achieved, our goals, policies and practices are reviewed. In this way, we strive to ensure continuous improvement.

The targets of our hotel's management system and the performance indicators that monitor compliance with the targets are included in the annex of this document.

Regarding sustainability, our hotel is the third member of the Türkiye Sustainable Tourism Program.

It undertakes to fulfill its stage obligations and to continuously improve the sustainable management system to increase sustainability performance.

Our management system is constantly reviewed due to the situation of the sector, environmental, social, technological, economic and cultural risks, changes and updates arising from legislation, and the system and policies are updated if necessary.

The steps mentioned above can be summarized as the Plan-Do-Check-Act (PDCA) approach (Figure 1).

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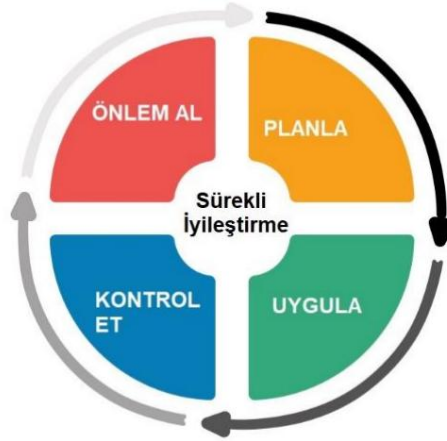


Figure 1. PDCA Cycle

Plan: Our hotel attaches importance to the environment, society, culture, country's economy and management system and sets goals. It plans the road map and actions to be followed in order to achieve the determined goals.

Apply: Our hotel determines its basic policies and practices regarding environmental, cultural, social, human rights, health and security. It monitors, measures and records these at intervals defined by the relevant personnel.

Check: Feedback from both staff and customers is monitored and recorded in our hotel. Corrective measures are taken if necessary.

Take precautions: This is the step where our hotel takes action to correct the problems identified in the check step. Corrective measures and actions are recorded and archived.

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3. LEGAL COMPLIANCE

Our hotel is committed to complying with the applicable laws, regulations and international agreements, keeps an up-to-date list of them, regularly informs its staff about them and provides the necessary training to the staff.

If asked or requested to be presented, our hotel submits all necessary permits, certificates and documents to the relevant persons and institutions.

These documents include: Business Opening and Working License, last month's personnel insurance declaration, tax certificate, emergency action plan, personnel training and certificates, contract with the occupational physician, sewer connection certificate obtained from the municipality, documents regarding pest control and other necessary documents. are documents.

4. STAKEHOLDERS AND COMMUNICATION

Our hotel provides accurate information to all segments of society in its promotion. Always uses real visual material in promotion. Our hotel is transparent and realistic in terms of its products and services on its website, social media accounts and other printed and written promotional channels and marketing communications. It has a structure.

Our hotel also includes its actions and transactions regarding policy and sustainability. It shares openly and transparently with its employees and customers. Our hotel's website is used to do this. Periodic reports about sustainability performance are published on our website. These reports are prepared in periods appropriate to their subject.

Our hotel has a system that aims to receive feedback from our customers, public institutions, municipalities, employees, local people and all other relevant persons and institutions regarding our sustainability performance, policies and practices. We receive feedback from both our staff and customers through this system.

Our system is designed to enable and encourage our customers and staff to provide feedback quickly, simply and effectively.

This system includes survey applications for guests, regular monitoring of social media accounts, e-mail, messaging services and other communication channels for employees, and e-mail communication and regular monitoring of all other stakeholders.

Customer experience: Customer satisfaction is given importance in our hotel. Customer satisfaction includes feedback from the system described above regarding sustainability. The results obtained are analyzed. Negative feedback and responses are recorded and necessary action is taken.

Staff participation: The most important element of our hotel's management system is our employees.

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Our employees know what they need to do in our management system and sustainability-related policies and practices. What our employees need to do is defined in writing, communicated to them, and the necessary training and guidance is provided regularly. Training on this subject is recorded.

Our employees take an active role in the development and continuous improvement of our management system and sustainability performance. We review and improve our system in line with the feedback from our employees.

Including orientation training in line with our sustainability policies and management system; Periodic training programs, on-the-job training, training required in accordance with legal regulations and guidance support are provided to employees regarding sustainability and their work areas. Occupational Health and Safety trainings, Kitchen/service/massage etc. hygiene training for personnel, water and energy saving, chemical substance use rules, fire protection, first aid, etc. We implement annual training plans on subjects.

Our employees have free and open access to all our training materials.

Our hotel undertakes to comply with the relevant provisions of the Labor Law No. 4857 and pays at least the minimum wage to its employees. In addition, our hotel undertakes to comply with the Social Insurance and General Health Insurance Law No. 5510 and the Occupational Health and Safety Law No. 6331.

Our hotel has created a "Sustainability Team" to manage sustainability activities.

5. ACCESSIBILITY

Our hotel is committed to providing accessible tourism services for everyone within its means and informs its customers and stakeholders clearly and accurately about the level of accessibility through its website.

Our hotel also undertakes to fully comply with legal regulations regarding accessibility and to continuously improve in this regard.

6. PURCHASE

Our purchasing policy includes policies for local, environmentally friendly, fair trade and efficient purchasing.

Our goods and service resources are monitored by our hotel. We hold meetings with our suppliers at regular intervals. We check their sustainability-related certificates, information and documents.

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Local purchasing: Our hotel gives priority to local suppliers when purchasing goods and services, provided that they are of high quality and reasonably priced. For this reason, it regularly inspects its suppliers, updates its supplier list and informs its suppliers. The rate of goods and services received from the people of the region is measured.

When purchasing goods and services, our hotel also gives priority to fair trade suppliers, provided that the imported products are of high quality and reasonably priced.

Environmentally friendly purchasing: Our hotel follows an environmentally friendly policy in purchasing and attaches importance to efficient purchasing, energy saving and water saving in order to reduce food and solid waste.

Our hotel gives priority to environmentally friendly products (environmentally labeled products) in its purchases. If there are no environmentally labeled products in the product group to be purchased, it selects the relevant products, production and all other processes from suppliers and manufacturers that do not harm the environment.

In this context, our hotel has sustainability certificates when making its purchases. prioritizes the selection of suppliers. Example certificates that can be sought from suppliers are documents such as ISO14001, ISO50001, ISO14064, ISO20400.

For wood, fish, paper and other foods, environmentally certified (FSC, MSC, EU-EcoLabel, etc.) or products with traceable sources are preferred.

Threatened species and species that are prohibited for sale (fish, trees, plants, game animals, etc.) are not bought or used in our hotel.

The ratio of our purchases from environmentally certified, local producers and suppliers, and fair trade suppliers to total purchases is measured.

Our hotel has goals regarding environmentally certified, local and fair trade purchasing.

In this context, we aim to increase the rate and number of local and fair trade suppliers in our purchases and we pay attention to this.

Efficient purchasing: Our purchasing policy favors reusable, returnable and recycled goods.

Our hotel also gives priority to bulk purchasing and bulk product purchasing. In this way, fewer transportations are made to our hotel and less greenhouse gas emissions are produced.

It is our main priority and preference to avoid unnecessary and excessive plastic, nylon, paper, glass and wooden packaging in the products arriving at our hotel.

When purchasing consumables and amenities, avoid disposable and unnecessary products.

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packaging (especially plastic) is avoided. The purchase and use of consumables and disposable products are monitored and managed.

7. ENVIRONMENT AND ENERGY

Energy saving: Our hotel has an energy saving policy. The policy includes regular measurement, monitoring and reduction of energy consumption and the use of renewable energy.

Our hotel groups energy consumption according to energy type, and energy consumption of different units is monitored.

The total energy used in our hotel is measured by type.

Our hotel identifies activities with high energy consumption, plans and implements corrective measures to reduce energy consumption in these areas and activities (thermal insulation systems, choosing low-consuming devices with energy consumption classes, using LED bulbs instead of high energy consumption lighting such as incandescent, etc.). . Additionally, our hotel uses energy-saving equipment.

Our hotel informs and trains its employees and stakeholders about energy saving.

8. WATER MANAGEMENT AND WASTEWATER

Our hotel has a water saving policy. Our policy includes regular measurement, monitoring and reduction of water consumption.

A water risk situation has been determined in the area where our hotel is located. For this purpose, the Water Risk Atlas prepared by the World Resources Institute is used. The link to the relevant website is located here.

In the risk analysis, water risk was also evaluated and a water management plan was made. This plan includes measurement and monitoring of water use and targets and reporting for reducing water consumption.

Due to our hotel's water use activities, creatures living in waters such as seas and lakes are not harmed. Nevertheless, the possibility of harm to these creatures was evaluated in the risk analysis and necessary precautions were taken.

Our hotel complies with all legal requirements and regulations in the use of water.

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The water comes from a legal and sustainable source.

We measure our water consumption. The total water used per guest or per night is calculated and reported. The file attached to this document is used for measurement.

We have goals to reduce water consumption. For this purpose, our hotel plans and implements corrective measures. Water-saving equipment is used in our hotel. Our hotel uses good practices such as changing sheets and towels upon guest request.

Our hotel informs and guides its employees and stakeholders about water saving. Our hotel uses all its resources to prevent waste water from harming the environment.

Regulations set by the local government are followed for the disposal of waste water. Legal requirements are complied with in this regard.

9. FOOD WASTE AND SOLID WASTE

Our hotel has a Solid Waste Management Plan. The plan includes regular measurement and monitoring of waste production, waste reduction, reuse, recycling and waste disposal.

Solid waste is separated according to types such as food, recyclable, toxic/hazardous and organic, and recycling and reuse situations are taken into consideration while separating.

Our hotel regularly informs and guides its employees and stakeholders about waste management through various visual and communication materials.

In our hotel, solid waste is separated by type and collected by authorized and licensed companies.

Solid waste, including food waste, is measured by type. In our hotel, the amount of solid waste per guest or per night is calculated and reported.

Our hotel has also identified activities and risk areas where solid waste generation is high. Plans and implements corrective measures to reduce food waste and waste.

It is aimed that solid waste disposal will not have a negative impact on the local population or the environment. Compliance with the "Zero Waste Regulation" legislation regarding solid waste management is ensured.

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10. SUSTAINABLE MANAGEMENT SYSTEM POLICIES

ÿ QUALITY POLICY

On the way to achieving our vision;

- To welcome guests at the highest level and to be a leading organization in the sector,
- We create our founding philosophy with all our personnel and ensure continuous improvement and trust in the workplace.
and to provide service that exceeds our guests' expectations,
- In accordance with national and international legislation and conditions; Preventing food safety risks
To provide service with the necessary sensitivity and approach,
- To be an exemplary business for all other organizations in our country and to create value,
- We ensure the health, life safety and work safety of our guests and staff.
these accidents by minimizing all risks that may endanger their safety.
to prevent,
- To make quality measurable, to ensure continuous improvement of the system and to set targets
to determine and ensure the unity of our employees and management,
- To create environmental awareness together with the hotel management and our staff, to protect the future generations.
Leaving a cleaner, healthier and safer environment is our primary quality goal.
between.

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ÿ CULTURAL SUSTAINABILITY POLICY

Presentation of cultural heritage: Our hotel respects the intellectual property rights of local people. Authentic elements of traditional and contemporary local culture are evaluated in our cuisine, design and decoration.

Artifacts: Our hotel does not buy or sell historical and archaeological artifacts, does not mediate their trade, and does not exhibit them.

Promotion of sustainable local gastronomy: Our hotel prioritizes the promotion and consumption of local products. It introduces innovative and creative practices to ensure sustainability in gastronomy in all its activities.

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ÿ ENVIRONMENTAL PROTECTION AND WASTE MANAGEMENT POLICY

We protect the environment in our business, prevent its pollution, and reduce our negative effects on the environment.
We attach importance to reducing and protecting.

For this;

- We comply with legal regulations and try to reduce our environmental impact.
- We manage our waste effectively according to its source, groups and hazard classes.
We take care to separate them.
- Hazardous substances and chemicals should only be used when and where necessary.
The negative effects of using up to
We know that it will reduce
- The materials we purchase in our business are "recycled" and "environmentally friendly"
By choosing those with labels, we contribute to protecting nature. Again
We try to create usage opportunities,
- Disposable materials such as paper, napkins, toilet paper and packaging
We use as much as necessary and take care to leave less waste to nature,
- Stores waste correctly, in separate areas according to its characteristics, and
by delivering it to licensed/authorized companies without exceeding the storage time limits,
We maintain records,
- We try to use water, energy and all natural resources economically. This
We share our sensitivity with our employees, guests and suppliers.
- We measure our performance in environmental management and use this data against targets.
We monitor and try to improve our performance.
- To educate our employees about the environment and increase their sensitivity
We are purposes.

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ÿ CHILD RIGHTS EXPLOITATION AND HARASSMENT POLICY

Children are our legacy to the future. Knowing them as individuals, respecting their rights, all kinds of psychological, physical, commercial, etc. It is our primary responsibility to protect and protect against exploitation.

To ensure this;

- We do not allow child labor in our own institutions and expect the same sensitivity from all our business partners.
- We provide environments/opportunities within the business that contribute to the development of children, where they can easily express their thoughts, wishes and feelings and feel free and comfortable.
- Preventing and detecting child abuse to our employees
We provide training on the subject.
- Children must be under adult supervision in the activities they participate in.
We make sure they are.
- Training to raise awareness about the protection of children's rights
We organize and support related projects.
- When we witness suspicious actions regarding children, we first inform the hotel management and ask for help from official organizations when deemed necessary.

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ENERGY EFFICIENCY POLICY

To protect our world from possible dangers, we use our energy efficiently and set targets to reduce our energy consumption.

For this

- In order to fulfill both our responsibilities towards nature and our legal obligations, we follow national and international standards, laws and regulations, voluntarily carry out studies that will reduce energy use and/or continuously improve our energy consumption performance, and monitor the results of our work.
- We set targets and include energy efficiency in our training programs to ensure the participation of our employees.
- We attach importance to collaborating with all our stakeholders to create common goals and results in energy management. We try to continue our interaction with our guests, employees, visitors and all business partners in order to reach an overall level of awareness and consciousness on these issues.
- Choose suitable energy efficient products, equipment and technology alternatives
We try to research, find, buy and use.
- We aim to document our Energy Management System, disseminate it to all our departments, update, review and continuously improve it when necessary.
- Energy risks or emergencies that may arise such as energy restrictions
We evaluate and plan the measures that can be taken.
- We manage our waste effectively according to its source, groups and hazard classes.
We take care to separate them.
- We know that using hazardous substances and chemicals only when needed and as much as necessary will reduce both the negative effects on the environment and the amount of waste,
- We contribute to protecting nature by choosing materials with "recycling" and "environmentally friendly" labels in the materials we purchase in our business. We try to create reuse opportunities,
- Disposable materials such as paper, napkins, toilet paper and packaging
We use as much as necessary and take care to leave less waste to nature,
- We store wastes correctly, in separate areas according to their characteristics, deliver them to licensed/ authorized companies without exceeding the legal storage time limits, and keep their records,

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- We try to use water, energy and all natural resources economically. We share this sensitivity with our employees, guests and suppliers.
- Measures our performance in environmental management and combines this data with targets.
We monitor and try to improve our performance.
- To educate our employees about the environment and increase their sensitivity
We are purposes.

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İ HUMAN RESOURCES POLICY

In our soul, the most important resource that makes us who we are is our employees. With this awareness, issues such as our employees' social and benefits, performance management, rewards, training and career management, and employee safety are always our priority. Our Human Resources Vision; To create qualified human resources that are highly motivated, protect and raise the corporate image, highlight innovative work, give importance to service and see their job as a part of the whole, and to be a pioneer in the sector and in Turkey with integrated human resources practices.

Our Human Resources Mission;

- To plan and train the human resources that will realize the goals and strategies of the institution, to carry out personnel work and transactions at an optimum level, to have highly self-confident personnel who are specialized in their fields, have the ability to represent the institution and can introduce new expansions in their field.
- To provide strategic support to all companies and departments to improve business results through human resources management, to contribute to the creation of value for all stakeholders by creating and encouraging a high performance culture.
- Our employees know what they need to do in our management system and sustainability-related policies and practices. What our employees need to do is defined in writing, communicated to them, and the necessary training and guidance is provided regularly. Training on this subject is recorded.
- Our employees take an active role in the development and continuous improvement of our management system and sustainability performance. • We review our system in line with the feedback from our employees and we heal.

Fair pricing

- Our employees are informed about the wages they will receive, working conditions, working hours, and when they will receive their wages, etc., before they start working in our facilities.

Education and Career Management

- All of our employees can benefit from the right to training equally. Including legal and professional training required by the hotel industry, as well as orientation training in line with our Sustainability policies and management system; Periodic training programs, on-the-job training, training required in accordance with legal regulations and guidance support are provided to employees regarding sustainability and their work areas. Occupational Health and Safety trainings, Kitchen/service/massage etc. hygiene training for personnel, water and energy saving, chemical substance use rules, fire protection, first aid, etc. We implement annual training plans on subjects.

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- Our employees have free and open access to all our training materials.
- Our hotel undertakes to comply with the relevant provisions of the Labor Law No. 4857 and pays at least the minimum wage to its employees. Our hotel also undertakes to comply with the Social Insurance and General Health Insurance Law No. 5510 and the Occupational Health and Safety Law No. 6331.

Employee and Human Rights

- Ensuring absolute satisfaction of employees is a priority issue.
From this perspective, the employee's legal rights, including some benefits provided by our business as fringe benefits; It is the management's responsibility to ensure the working environment, psychology, self-motivation, performance, in short, all comfort in the workplace. • Although we have a number of foreign employees in our hotels, as a business that caters to guests of different nationalities and provides services at an international level, we do not have any discrimination regarding nationality, race, language, etc. for our guest or guests. Discrimination is against both our hotel management and working principles. Therefore, all personnel matters of our employees from different countries or nationalities are followed in accordance with legal procedures, and all our employees are offered equal opportunities within the hotel, regardless of their characteristics.

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ÿ OCCUPATIONAL HEALTH AND WORKER SAFETY POLICY

In order to protect our workplace, employees, guests and suppliers, create a safe work environment and ensure continuity;

- We comply with all legal and other obligations regarding Occupational Health and Safety.
- We adopt the principle that Occupational Health and Safety and improvement activities are the common responsibility of all employees.
- For participation in Risk Assessment and Risk Level Reduction activities at all levels
We set goals.
- Sustainable "Zero Work Accident" by continuously improving our Occupational Health and Safety culture.
We aim to achieve your goal.
- We carry out our work within the scope of occupational health and safety in order to be a pioneer and an example.
We share it with all our employees and our environment.

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ÿ WOMEN'S RIGHTS AND GENDER EQUALITY POLICY

We attach importance to gender equality in our business.

- Ensuring the health, safety and well-being of all our employees, regardless of gender

We provide.

- We support women's participation in the workforce in all our departments and ensure equal

We offer opportunities.

- We act with the policy of "equal pay for equal work" without discrimination of gender.

- We distribute tasks by taking into account the principle of equality.

- We provide the necessary environment to benefit from career opportunities equally.

- Creates education policies, promotes women's participation and raises awareness.

We will support you.

- We create work environments and practices that maintain work-family life balance.

- We support women to be in company management and provide equal opportunities.

- Women shall not be subjected to any form of abuse, harassment, discrimination, oppression, coercion or slander.

etc. We do not allow it to be exposed to such situations. To the world and our institution

We are always aware of the value they add and support them.

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11. Cultural Sustainability Policy

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İ SOCIAL RESPONSIBILITY POLICY

We believe that all our employees have the right to work in a healthy and safe environment, under working conditions compatible with human dignity. Our primary business goal is to ensure and protect the safety of our employees, with the awareness that they are our most valuable asset.

Beyond legal obligations, our hotel is always ready to implement the best environmental solutions, develop and popularize environmentally friendly technologies, and support initiatives that will increase environmental awareness.

In Istanbul, where we operate, our social and environmental responsibilities towards society; We take care to carry out our work in harmonious cooperation with our shareholders, employees, public, non-governmental organizations and other stakeholders.

We believe that our human resources are the most important element of sustainable growth. We ensure that our employees' personal rights are fully and correctly exercised.

We treat our employees honestly and fairly, and we are committed to a non-discriminatory, safe and healthy working environment.

We make the necessary effort for the individual development of our employees and observe the balance between business life and private life.

We manage the environmental impacts that may arise from all our activities with a sense of responsibility.

Within the framework of the principle of corporate social responsibility, we strive for the development of our society. We support our employees to volunteer for appropriate social and community activities in which they will take part with social responsibility awareness.

We take care to develop approaches to ensure that all our business partners, especially our suppliers, act in the field of social responsibility and to implement these approaches.

Within the framework of occupational health and safety, we have taken all precautions for our employees and are particularly sensitive about providing the necessary on-the-job training by experts within the framework of the annual training program.

We are sensitive to the traditions and cultures of Turkey and the countries in which we operate and act in accordance with all legal regulations.