

AĞAOĞLU AVRASYA GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş. (“COMPANY”)

ETHICS AND COMPLIANCE POLICY

1. Core Values

As Ağaoğlu Avrasya Real Estate Investment Trust Inc., we adopt a respectful approach to human rights in the communities where we operate and consider providing our employees with a positive and professional working environment as a fundamental principle. We are fully aware of our responsibilities toward our customers, investors, and society.

2. Why and For Whom Are Our Ethical Principles?

The importance of ethical values in business and society is steadily increasing. Ethical principles go beyond acting solely for profit.

2.1. Why Are Ethical Principles Important?

- **Building Reputation and Trust:** Acting in accordance with ethical values strengthens our company's reputation. Customers, suppliers, investors, and other stakeholders prefer to work with companies that demonstrate ethical behavior.
- **Long-Term Success:** Ethical behavior prioritizes long-term success over short-term gain.
- **Social Responsibility:** Our company considers contributing to the well-being of the communities in which we operate as a core responsibility.

Who Does It Apply To?

- **Employees:** Employees want to work in an environment aligned with ethical values. An ethical culture increases motivation, strengthens loyalty, and enhances productivity.
- **Customers and Consumers:** Customers want assurance that a company operates ethically. Unethical behavior undermines trust and reduces customer loyalty.
- **Suppliers and Business Partners:** Ethical relationships with suppliers and business partners are crucial. Unethical behavior can damage trust and harm business relationships.
- **Investors and Shareholders:** Investors and shareholders expect the company to act in accordance with ethical values. Unethical behavior can erode their trust and negatively affect financial performance.
- **Society:** Companies are expected to fulfill their social responsibilities. Acting ethically enhances societal well-being and establishes a socially responsible corporate image.

In conclusion, ethical principles are fundamental for businesses and institutions. They are important not only in business but also for the overall welfare of society. Acting ethically ensures long-term success, reliability, and a sense of social responsibility.

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Barbaros Mah. İhlamur Bul. F Blok No:4/B İç Kapı No:2 Ataşehir/ İstanbul

Tel: 0 (216) 687 1111 pbx Fax: 0 (216) 687 7126

Mersis No: 0009186281200001

Kozyatağı V.D. 0091862812

3. Principles and Policies

3.1. Respect for Human Rights

Respecting human rights is one of our core values. We believe that every employee is entitled to equal rights and take necessary measures to protect them. No hiring, promotion, training, or other processes are based on race, gender, age, religion, ethnicity, sexual orientation, or any other discriminatory factor. Employees' freedoms, privacy, and personal integrity are protected, and necessary action is taken in case of harassment or mistreatment.

3.2. Compliance with Law

As a company, we fully comply with all applicable laws in conducting our activities. Operating in accordance with legal regulations is essential to protect both the company's and employees' safety and reputation. All employees are expected to understand and act in accordance with legal requirements. Anyone violating laws or regulations will face appropriate legal action.

3.3. Prevention of Conflicts of Interest

Our company places great importance on preventing conflicts of interest. Policies and procedures are in place to ensure employees perform their duties impartially and honestly. Employees must not prioritize personal interests over the company's interests. Any potential conflict of interest must be reported transparently, and appropriate measures are taken.

3.4. Occupational Health and Safety

Occupational health and safety are prioritized in both office and field operations. Risk assessments are conducted, training is provided, and improvements are continuously implemented.

3.5. Anti-Bribery and Anti-Corruption

Our company strictly opposes bribery and corruption. Offering, receiving, or permitting bribes is unacceptable. Employees must fully understand relevant legal regulations and company policies and act with vigilance. Any suspected bribery or corruption is reported immediately, and necessary investigations are conducted.

3.6. Compliance with Tax Regulations

We fully comply with tax regulations and ensure accurate and timely tax filings. Tax evasion or avoidance is not tolerated, and legal action is taken against offenders.

3.7. Confidentiality and Protection of Insider Information

Protecting confidential and insider information is a top priority. Employees are required to maintain confidentiality regarding trade secrets, customer information, financial data, and all other internal information. Unauthorized use or disclosure may result in serious consequences, and violations are met with strict sanctions.

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3.8. Donations, Sponsorships, and Community Investments

We are aware of our societal responsibilities and actively participate in social responsibility projects and community investments. Donations and sponsorships are managed transparently and aim to provide societal benefits.

3.9. Compliance with Competition Law

Fair competition and compliance with applicable laws are fundamental principles.

3.10. Creating a Healthy and Safe Work Environment

Ensuring a healthy and safe work environment is a key priority. Policies are established, risk assessments conducted, and regular training provided. Continuous monitoring and improvements prevent potential workplace hazards.

3.11. Use of Social Media Accounts

Company social media accounts must be used in accordance with established rules. Employees should protect the company's reputation, avoid sharing confidential information, and not post misleading or harmful content regarding the company, employees, or stakeholders.

3.12. Honest and Fair Treatment of Stakeholders

All interactions with stakeholders are guided by honesty and fairness. The company's long-term success depends on strong and reliable relationships. Any conflicts of interest or bias are addressed transparently and corrected promptly.

3.13. Compensation

Ensuring fair and competitive compensation is a company priority. Policies consider employee contributions, experience, and performance. Transparency and fairness guide all decisions regarding salary determination and increases.

3.14. Non-Discrimination

We provide equal opportunities and do not tolerate discrimination based on race, gender, age, religion, ethnicity, sexual orientation, or other personal attributes. Diversity and inclusion policies are implemented to ensure equality and fairness.

3.15. Building Sustainable Relationships

We aim to establish long-term, mutually beneficial relationships with customers, suppliers, business partners, and other stakeholders based on understanding, respect, cooperation, and consensus.

3.16. Freedom of Organization and Collective Bargaining

Employees have the right to organize and engage in collective bargaining. Protecting and supporting these rights is a core part of our company policy.

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3.17. Transparency and Compliance in Donations and Sponsorships

Transparency and regulatory compliance guide all donation and sponsorship activities. Such initiatives align with company values and strategic goals and are carefully monitored.

3.18. Prevention of Harassment and Violence

We do not tolerate harassment or violence. Any incidents affecting employees, customers, suppliers, or stakeholders are addressed immediately, with legal action initiated as needed.

3.19. Protection and Confidentiality of Personal Data

We prioritize the protection of personal data of employees, customers, and stakeholders. All collection, use, storage, and sharing of personal data adhere to privacy and security standards in compliance with relevant regulations.

3.20. Protection of Commercial and Strategic Secrets

Necessary measures are taken to protect commercial and strategic secrets. Confidentiality policies are implemented and employees are responsible for safeguarding such information.

3.21. Careful Selection of Business Partners

Business partners are chosen carefully based on ethics, quality standards, environmental and social responsibility, transparency, fair competition, and long-term collaboration.

3.22. Creating a Fair and Sustainable Work Environment

We aim to provide a fair and sustainable work environment, developing policies that respect workers' rights, occupational health and safety, and work-life balance, while prioritizing employee well-being and satisfaction.

3.23. Employee Responsibilities

Employees are responsible for performing their duties ethically and responsibly, adhering to company policies, collaborating effectively, maintaining open communication, and embracing company values.

3.24. Manager Responsibilities

Managers are responsible for upholding ethical standards, managing operations effectively, implementing policies, motivating and leading employees, managing risks, and ensuring long-term success. They are also responsible for supporting employee development and maintaining the company's reputation.

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