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Nusr-Et Corporate Code of Conduct





DEAR COLLEAGUES,

We draw strength from our unity, turning uncertainties into predictable outcomes, transforming challenges into success stories, and continuing to set an example for our community through our efforts.

Ethics, business integrity, and social responsibility are fundamental priorities for our organization, and our commitment to these principles is the key to our long-term success. In this context, we have compiled the Nusr-Et Corporate Code of Conduct, which brings together the responsible behaviors we already demonstrate in our work.

This document is built upon core ethical principles such as integrity, respect, confidentiality, equality, fairness, social responsibility, and collaboration. These principles are crucial for supporting the sustainable growth of our organization and its employees.

We believe these ethical guidelines will provide a solid foundation for the future of our organization. By considering the commitment of all our employees to these values, we are confident that we will move towards a more ethical and successful future together.

Best regards,

PREFACE

As a global brand, Nusr-Et is driven by an entrepreneurial spirit and a strategic vision. With a comprehensive approach and carefully made decisions, it is an organization that strives for 'the very best,' creates unique experiences, and grows on its way to becoming an inspiring brand worldwide.

The Nusr-Et offers its guests the perfect blend where quality, originality, and taste come together and create unforgettable moments. While continuing its mission of providing superior quality and delivering creative service to its guests on a global scale, the organization places great importance on the personal and professional development of its employees. As a result, it aims to contribute to society and its guests by fulfilling its social, environmental, economic, and ethical responsibilities. Through this, Nusr-Et aims to become a symbol of trust, consistency, and respect for its guests, shareholders, employees, suppliers, and all stakeholders, both locally and globally.

The Nusr-Et Corporate Code of Conduct is designed to guide Nusr-Et employees and all stakeholders in understanding the values they should uphold and the behaviors they should demonstrate when making decisions. All employees of Nusr-Et must follow the principles outlined in the Nusr-Et Corporate Code of Conduct. All business partners are expected to comply with business ethics rules and the implementation principles that support these rules. The Nusr-Et Corporate Code of Conduct must be communicated to all employees, ensuring that they attach the necessary importance to these rules and comply with them.

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1. OUR VALUES AND WORK ENVIRONMENT

In our company, we aim to act in accordance with the business code of conduct and values and shape our work environment in this regard.

We build our work culture by focusing on the following core values.

- **Guest Focused:** We place our guests' satisfaction and experience at the heart of everything we do, striving to meet and exceed their expectations in collaboration with our business partners.
- **Quality Focused:** We aim for the highest standards in every aspect of our business, strive for continuous quality improvement embracing a sustainable approach to excellence.
- **Act as Owner:** We not only embrace our individual responsibilities, but of the entire operation as if it were our own. We identify and address critical issues that are vital for the sustainable success of our company, ensuring we fulfill our roles to the highest standard.
- **Team Spirit:** We prioritize achieving our shared goals in partnership with all stakeholders. We act as one cohesive team, supporting each other and celebrating our collective successes.
- **Continuous Improvement:** We embrace learning through experimentation and experience, sharing our insights and knowledge with our business partners as we grow. Our focus is on enhancing our business and personal development.
- **Diversity and Inclusion:** We are an open, respectful and inclusive work environment locally and globally, embracing individual differences and promoting diversity.
- **Integrity and Fairness:** We are committed to acting fairly in all matters by adhering to ethical principles. This allows us to create a trustworthy business environment and ensures sustainable success.



1. OUR VALUES AND WORK ENVIRONMENT

We act in accordance with the core values, vision, and procedures of the Nusr-Et. Our top priority is to ensure full compliance with the law in all our activities. We commit to maintaining a high standard of business ethics, working with integrity, and embracing ethical principles.

In line with the value of Diversity and Inclusion, we do not tolerate any form of discrimination among employees based on age, gender, race, color, belief, ethnicity, nationality, language, religion, sect, marital status, location, disability, philosophical and political views, sexual orientation, gender identity, or any other grounds protected by law. We provide all our employees with a collaborative work environment that respects diverse beliefs, thoughts, and views. In accordance with this principle, we do not consider age, gender, religion, language, or similar factors as evaluation criteria in human resources processes such as recruitment, promotion, training, compensation, and rotation, in line with the principle of equal opportunity. All decisions regarding these processes are made based on legitimate job-related factors and objective criteria including qualifications, experience, skills, and performance. Additionally, we maintain the confidentiality of every employee's personal information, respect differences, and treat our colleagues fairly.

We listen to our internal stakeholders as much as our external stakeholders and value their ideas and opinions. Each employee plays a role in shaping the processes, projects, and decisions within their respective areas of work. Therefore, we are committed to building a working culture where our employees produce and create value together, encourage sharing and act with common sense.



1. OUR VALUES AND WORK ENVIRONMENT

We take care to ensure that the relevant people are informed about all our activities regarding working life and all matters relating to our business by communicating in a timely and open manner. We place great importance on informing our employees first about any changes and updates related to Nusr-Et. We keep employees updated about our strategies and goals through meetings in which management participates. With our open-door policy, all employees are encouraged to consult with managers or human resources on any matter and share their opinions. This way, we prevent gossip and misinformation from harming our work environment.

We perform our duties within the framework of fundamental human values and high standards. We embrace an approach that prioritizes environmental sustainability and societal benefit. By minimizing risks in the workplace, we provide appropriate conditions for our employees to work in a safe and healthy environment. We consistently provide training and raise awareness on health and safety matters.

We conduct our competition in full compliance with legal and ethical standards. We make sure to establish honest and trustworthy relationships with our group companies and the organizations we collaborate with.



2. EMPLOYEE RIGHTS AND OBLIGATIONS

2.1 The Duty of Care and Loyalty

Under Labor Law, we are obligated to act with loyalty and duty of care in business processes. Working responsibly from the office or remotely, preserving the employer's identity, protecting trade secrets, and avoiding attitudes and behavior that may cause unfair competition against the employer during the business relationship are included within the scope of this obligation. Ensuring that the legal and commercial reputation of the employer is not harmed outside of business hours is another aspect of this obligation. The Duty of Care and Loyalty is an essential legal requirement of respecting the employer and business.

2.2 Using Company Time and Assets

We regard company time as a company-owned asset. We are responsible for protecting company assets and using them only for the benefit of the company. We do not use any company resource to obtain non-business benefits and/or for illegal activities.

2.3 Working Outside of Nusr-Et

We can become members of associations, foundations, unions, cooperatives, sports clubs, and professional chambers or engage in activities for social benefit through NGOs or Do Volunteers outside of business hours, provided that we fulfill our duties and responsibilities at Nusr-Et. In addition, we can participate in seminars and conferences as speakers and give lectures at universities to improve our business and employer brand as long as the management is informed of such engagements.



2. EMPLOYEE RIGHTS AND OBLIGATIONS

2.4 Conflict of Interest and Unfair Advantage

We do not enter any business relationship that would create a conflict with Nusr-Et's interests. We work to serve the best interest of our company and do not abuse our positions to secure special favors through business relations for ourselves, our families, relatives, suppliers, customers/guests, colleagues, partners, and competitors. We ensure that our relations do not damage the reputation of Nusr-Et in any way. We take care not to seek personal benefits in Nusr-Et and under no circumstances do we allow any benefits to be provided to relatives and third parties.

2.5 Receiving Gifts

Exchanging gifts or participating in various activities with friends may strengthen our business relations and are considered well-intentioned behavior. However, in cases that violate company principles & policies and applicable laws & regulations, such exchanges may damage our company's reputation and even lead to legal and criminal action. When we are in situations where we may need to accept invitations, gifts, or attend events due to our work, we need to think about and consider the perception of such an offer on third parties rather than its monetary value. When we send business gifts or invite clients or suppliers to events, we know that we shouldn't use our personal resources to pay for it. We recognize that such activities must be funded from the company budget with management approval. In cases where we must accept the gift, we inform the senior management of this situation. We never accept a gift that we cannot report or repeated gifts. We also know that we should not accept gifts in cash or similar forms.

2. EMPLOYEE RIGHTS AND OBLIGATIONS

We consider the following questions when receiving or giving gifts and hosting for representation purposes: “Is there a possibility that the gift I receive/give will prevent me from making objective business decisions and affect my objectivity? Would offering a gift or hosting make the recipient feel obligated or forced? Would accepting a gift or hosting put me and my company in a difficult position?” Event tickets for advertisement and promotion purposes, attending dinners or cultural or sports events and invitations to such activities are also regarded within this scope. For the acts of giving and accepting gifts to be of an acceptable nature, they must comply with laws and regulations, and the following criteria:

- The act should not be against the will of the other party.
- The gift should not be used as cash or money (gift checks, cards, etc.). It should not have a material value that may cause third parties to be uneasy or suspicious (It is not appropriate for us to accept gifts from the same person or institution in a calendar year, the value of which exceeds the amount determined by our company). Our manager should be informed of such gifts.

2.6 Bribery and Corruption

Offering or accepting bribes or kickbacks, which constitute a criminal offence, is strictly prohibited in our business processes. When faced with such a situation, we immediately report it to our manager and/or a senior manager. Furthermore, we never ask for personal loans or special concessions or discounts from our customers/guests, suppliers, and third parties other than those offered to all.



2. EMPLOYEE RIGHTS AND OBLIGATIONS

2.7 Political Activities

We respect the political views and activities of our colleagues. We do not allow our personal views and political engagement choices to influence or interfere with our job and company activities. We do not promote our political views within the company.

2.8 Media Communications

In our company, press and media relations duties are carried out by persons appointed by the management as employer spokespersons. In media relations, we act in accordance with the communication protocol, and we must obtain approval from management before giving statements to any media organization, participating in interviews, or speaking at seminars, conferences, or similar events.

2.9 Using Social Media

When expressing personal opinions in public spaces or through various online platforms, such as social media channels (Instagram, Facebook, Twitter, blogs, etc.), we understand that speaking on behalf of the company violates our Corporate Code of Conduct. We only share content in our own name and must not forget our identity as “Nusr-Et Employee.” We do not tag the company in personal posts, and we avoid making any posts that could harm the company’s reputation.

We follow the social media accounts of the company. We are informed about the latest news and the corporate view of our company on various situations. We share our celebrations, exciting new business and product developments on social media.



2. EMPLOYEE RIGHTS AND OBLIGATIONS

We are aware that our social media posts are public and can be seen by employees, customers/guests, suppliers, or the press, and we act with this sense of responsibility. We recognize that our right to freedom of expression should not infringe on the rights and freedoms of others.

2.10 Remote Work

At Nusr-Et, we can work flexibly within certain rules with a performance-focused culture keeping the sustainability of the business at the forefront. We recognize that certain roles that require working in the physical setting are excluded from this rule to ensure operational continuity and as a necessity of the job.

When working remotely, we comply with data privacy and occupational health and safety requirements, obligations specified in our employment contracts, and the employer's relevant guidelines. We are always available and accessible during business hours.



3. HUMAN RESOURCES

3.1 Recruitment of Relatives and Acquaintances

Family members and acquaintances of employees can only be hired based on their qualifications, performance, skills, and experience, as long as they are part of different legal entities. However, in such cases, there must be no direct or indirect reporting relationship between the employee and their relative or acquaintance.

Fair Employment Principles are applied among relatives and acquaintances and equal treatment is given to individuals in all employment processes, such as salary, promotion, and transfers, based on the company's evaluation criteria. Furthermore, these principles will remain applicable even if the relationship develops after the employee joins the company.

Employees must notify the company in writing within one month at the latest if they have a relative within the company.

3.2 Sexual Harassment and Workplace Violence

We know that sexual harassment, defined as a sexual crime according to law, means, in the simplest terms harassing an individual in various ways with sexual motivation, and we never engage in such conduct, verbally or physically. Furthermore, we never allow anyone who attempts such harassment, and we report it to our managers immediately. We know that remaining silent and not reporting the perpetrator is also a violation.

We do not tolerate threats, harassment, hostile or abusive words, and behaviors while driving company vehicles or in our work environment or any



3. HUMAN RESOURCES

building or office belonging to our company. In addition, we do not engage in conduct that could damage company assets. When such a situation occurs, we impose disciplinary measures specified in the company policies and procedures, ranging from terminating employment to taking legal action.

We are responsible for providing a healthy and safe workplace, free from all kinds of violence and threats. We recognize that domestic violence, which could also threaten this environment, is not limited to private life but also affects business life. Therefore, we prioritize creating a safe work environment, providing guidance for our employees and raising awareness about domestic violence, encouraging respect and trust-based relationships among our employees, and informing them about reaching out to the relevant units that can intervene in a possible case of violence. Furthermore, we strive to ensure that employees who have been subjected to domestic violence feel safe at work and do not hesitate to seek support and help.

Such behavior is unacceptable and will be taken seriously, investigated immediately, and reported with respect for confidentiality and support. By reporting these incidents, we contribute to the organization's effective efforts in addressing and combating such issues.

3.3 Protection of Human Dignity

We provide dignified jobs and working conditions for all our employees. Our top priority is to provide a safe and healthy work environment for our employees, to approach all our employees with equal opportunity principle and to create an environment where they can express themselves freely.



3. HUMAN RESOURCES

We implement occupational health and safety measures in all working locations of our company.

3.4 Drug Abuse and Gambling

We are responsible for providing a safe and healthy work environment for our employees, and any behavior that could disrupt this environment is considered a violation of the Nusr-Et Corporate Code of Conduct. Our employees must not possess or use any illegal substances, drugs, addictive materials, or substances that impair mental or physical faculties, or pose a risk to workplace safety and health. This includes any items that could affect job performance, create hazards in the workplace, or endanger the health and safety of employees.

During working hours, we avoid activities like playing games on gambling or betting websites operating within the framework of the legislation. Employees are prohibited from participating in, facilitating, or supporting illegal gambling activities, including participating in or promoting unauthorized games of chance, betting, or any similar activities. This includes facilitating the purchase or sale of tickets for such activities, organizing prize-based lotteries, or engaging in any form of gambling or betting. Engaging in these activities for personal gain or creating opportunities for others to do so is strictly forbidden and will not be tolerated.

Additionally, when using company vehicles or during working hours, we make every effort to ensure that our attention is fully focused and that we meet the necessary conditions to maintain a high level of vigilance.



4. SUPPLIER AND GUEST RELATIONS

4.1 Supplier Relations

We act with fairness, goodwill, and understanding in all our relationships with suppliers, partners, and consultants to ensure mutual benefit.

We expect the suppliers and business partners we collaborate with to adopt our values and comply with the law in all our business relationships.

In our supplier selection process, we evaluate our suppliers objectively based on performance, quality, and cost criteria.

In accordance with our high standards of business ethics and principles of integrity, we always behave with honesty, respect, and fairness towards our suppliers and business partners.

We do not share information about contracts and business processes with suppliers or partners or third parties outside the company.

When dealing with suppliers and business partners, we must consider the value of any offered gifts and their potential impact on third parties. In our relationships with suppliers, we avoid abusing our titles and authorities to gain personal benefits for ourselves or our close ones.

4.2 Guest Relations

We provide our guests with complete, clear, and accurate information regarding the services and products we offer. We avoid providing inaccurate or incomplete information about our products and services.

While addressing our guests' needs and requests, we deliver our services



4. SUPPLIER AND GUEST RELATIONS

under the agreed conditions and work with a guest-focused approach. In accordance with our superior business ethics and principles of integrity, we always treat our guests with respect, fairness, and honesty.

We carefully consider and evaluate the feedback we receive from our guests and work on providing solutions.

We ensure that our guests' information is protected in accordance with relevant laws. We do not use or share our guests' information for any external activities.

4.3 Relations with Competitors

Our approach to business is based on ethical, fair, and effective competition. Adhering to this principle, we conduct our activities in accordance with the regulations on competition law and encourage strong competition.

We avoid any agreements or actions, either directly or indirectly, that aim to distort, obstruct, or restrict competition, or that may have such effects.

When gathering information about competitors, we refrain from using methods that are not in line with competition law. In case of doubt about the methods, we consult the Legal Department.

4.4 Public Relations

We remain impartial towards all public institutions, civil society organizations, and political parties, without expecting any personal gain, and fulfill our responsibilities with this sense of accountability.



4. SUPPLIER AND GUEST RELATIONS

In our relationships with public institutions and organizations, we do not make any facilitative payments, offer gifts, or provide commitments aimed at influencing decisions in violation of laws and regulations. Similarly, we do not make donations to political parties, their members, or related organizations. We act by taking legal regulations into account in our business relations with public officials and we pay attention to the transparency of these relations.

4.5 Media Relations

Our company's relations with the press and media are handled by individuals appointed by management as employer spokespersons. In media relations, we act in accordance with the communication protocol, and we must obtain approval from management before giving statements to any media organization, participating in interviews, or speaking at seminars, conferences, or similar events.

When expressing personal opinions in public spaces or through various online platforms, such as social media channels (Instagram, Facebook, Twitter, blogs, etc.), we understand that speaking on behalf of the company violates our Corporate Code of Conduct. We only share content in our own name and must not forget our identity as "Nusr-Et Employee." We do not tag the company in personal posts, and we avoid making any posts that could harm the company's reputation. We are aware that our social media posts are public and can be seen by employees, customers/guests, suppliers, or the press, and we act with this sense of responsibility. We recognize that our right to freedom of expression should not infringe on the rights and freedoms of others.



5. PRIVACY

5.1 Protecting Privacy

We are responsible for the confidentiality of the information we obtain due to our job, and we act accordingly. We do not disclose any information, document, image, picture, or file related to the company on any portal, forum, and social media without the approval of senior management.

- Personal Data and Protection of Personal Data

a) Data privacy

We process and protect personal data as follows:

- We process and protect personal data in accordance with the law on protection of personal data.
- We run processes in compliance with the law on protection of personal data.
- We run processes that comply with the law on protection of personal data to collect and process the personal data of our own employees and data subjects such as customers and suppliers.
- We anticipate communication channels that would enable the data subjects to exercise their legal rights specified in the law on protection of personal data.

b) What do data protection laws regulate?

- When and to what extent can personal data be collected?
- How can it be used and when should it be deleted?
- What notifications should be provided?
- When and what kind of permissions should be obtained?
- How to differentiate when personal data may be disclosed or shared with third parties.

5. PRIVACY

- How to know when it can be transferred abroad.
- How to protect the data subjects' rights regarding their personal data.

At Nusr-Et, we process personal data with integrity in accordance with the law and on a “need to know” basis.

Regarding personal data shared with us by data subjects, we inform them about who (department/unit) collects and processes it for what purpose. We run processes that respect data owners' rights such as access and correction. We do not use personal data for reasons other than the primary processing purpose. In addition, we use personal data in pseudonymized and/or anonymized form to the extent possible.

As Nusr-Et, we store data in accordance with the policies and procedures regarding personal data storage and destruction. Once the purpose of collection is no longer valid, we destroy personal data in accordance with relevant policies and procedures. At Nusr-Et, we take technical, administrative and physical measures to protect personal data.

c) What is personal data?

Personal data is any type of information that could make a person known or identifiable, e.g., ethnic origin, health information, credit card details, email address, mobile phone, address, images, and videos. At Nusr-Et, we ensure that data processors, who process personal data on our behalf and by our instructions, take all legal and technical measures to protect this personal data and act in accordance with data protection legislation. In addition, we take necessary security measures against



5. PRIVACY

data breaches, unlawful access to personal data, disclosure, and loss.

More information on personal data is provided in the Personal Data Protection Policy on the web pages of Nusr-Et.

- Non-disclosure of Confidential Information

We disclose confidential information that we acquire as part of our job only with authorized individuals. Compensations, benefits, and personal information are confidential and are not disclosed to anyone other than the authorities. We do not discuss confidential information in public places such as dining rooms, cafeterias, elevators, or service areas. We keep passwords and usernames used to access company information confidential. We do not make false statements about individuals or organizations and avoid all gossip.

- Not Using Company Information for Personal/Commercial Reasons

We do not use company information for personal or other commercial purposes.



6. ENVIRONMENTAL RESPONSIBILITY

We are aware of our responsibility to keep the environment clean, use resources carefully, and protect the environment in line with the principles we have adopted. In this regard, we carry out our activities in a safe and environmentally friendly manner, while considering the legal requirements of the business.

To ensure environmental sustainability, we aim to guide our operations in a way that minimizes environmental impacts, uses energy and resources efficiently, promotes recycling, and protects the natural environment for future generations.



7. SUSTAINABILITY

At Nusr-Et, our aim with our Sustainability Policy is to align our performance in economics, environment, social responsibility, and governance with global goals, while guiding our approach to key issues based on our corporate values, core principles, and ethical standards.

With our Sustainability Policy, we base our approach on the following principles:

- We ensure the efficient and effective use of resources,
- We develop solutions for energy efficiency and establish the necessary infrastructure,
- We implement high-impact social projects and long-term solutions to social issues, contributing to societal development,
- We assess the environmental and social impacts of our activities to ensure the protection of public health,
- We create a work environment where employees can develop themselves and work in safety, enhancing employee engagement and well-being,
- We prevent any form of discrimination in our work environments and, accordingly, provide equal rights in areas such as employment, career management, compensation, and performance evaluation,
- Believing in the power of women, we support the development of women's employment at all levels of our work environments and their qualified active participation.



8. CORPORATE SOCIAL RESPONSIBILITY

At Nusr-Et, our Corporate Code of Conduct, prepared and implemented within the framework of Corporate Social Responsibility Principles, serves as a guide in the way we do business.

The core principles we base our social responsibility practices on are as follows:

- We do not accept any form of discrimination based on language, race, color, gender, political opinion, belief, religion, age, physical disability, or similar reasons among employees within the organization.
- We create a cooperative, positive, and harmonious working environment, preventing conflicts, and ensuring that people with different beliefs, thoughts, and views work together in harmony.
- At Nusr-Et, we believe that all our employees have the right to work in conditions that respect human dignity, in a healthy and safe environment. Our employees are our most valuable asset, and ensuring their safety is our top priority.
- We believe that our human resources are the most important element of sustainable growth. We ensure that the personal rights of our employees are exercised fully and correctly. We approach our employees with integrity and fairness, and commit to providing a non-discriminatory, safe, and healthy working environment. We make the necessary effort for the individual development of our employees and ensure a balance between work life and personal life.



8. CORPORATE SOCIAL RESPONSIBILITY

- We develop and ensure the implementation of approaches to ensure that all our business partners, especially our suppliers, act in line with the corporate social responsibility standards of Nusr-Et.
- We are sensitive to the traditions and cultures of Turkey and the countries where we operate. We act in compliance with all applicable legal regulations.

