

SEMPRO Consultancy, Engineering and Representative Services

POL-008

Code of Ethical Conduct and Application Methods

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Used by	SEMPRO

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1. PURPOSE

The Sempro Code of Ethics described in this document applies to all Sempro employees. All Sempro employees are required to comply with the Sempro Code of Ethics.

These values and ethical principles guide our business operations.

All employees are expected to fully understand this Code of Ethics, to conduct their work ethically and in accordance with company values, and to act in compliance with the law and company policies..

The Sempro Anti-Bribery and Anti-Corruption Policy and Compliance Policy, which have been established to identify and manage bribery and corruption risks, are integral parts of this Sempro Code of Ethics. Employees and business partners are obliged to comply with these rules.

2. RESPONSIBILITIES

With a deep understanding of both legal and social responsibilities, we conduct our business with a commitment to ethical behavior towards all our stakeholders: customers, employees, shareholders, suppliers, business partners, competitors, Turkish society, and the global community.

2.1. Legal Responsibilities

Driven by our commitment to sustainability across diverse sectors and business areas, we operate in compliance with all applicable laws, both domestically and internationally, recognizing the legal framework of the Republic of Turkey and international law.

2.2. Responsibilities to Our Customers

Guided by respect, fairness, courtesy, and a commitment to equality, we prioritize customer satisfaction by precisely analyzing their needs and delivering our services on time and as promised.

2.3. Responsibilities to Our Employees

Committed to our employees' well-being, we foster a culture of open communication and non-discrimination. We invest in their individual development and provide a work environment that respects work-life balance.

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2.4. Responsibilities to Our Suppliers / Business Partners

Building trust and open communication, we honor our agreements with all suppliers and business partners, fostering respectful relationships.

2.5. Responsibilities to Our Competitors

We avoid using our competitors' information unfairly. We compete fairly and ethically, avoiding any misuse of competitor information.

2.6. Responsibilities to Society and Humanity

Our priority is that our activities contribute to society. For this reason, we provide services that contribute to society, and we do not prefer to produce works without added value. We volunteer to support individual activities that reflect Sempro values and benefit the society.

3. DIVERSITY AND RESPECT FOR EQUAL OPPORTUNITIES

For Sempro, the concept of "diversity" means recognizing and valuing the religious, structural and cultural differences of employees, customers, suppliers and other stakeholders.

We keep our beliefs, worldviews and political evaluations separate from our work environment and the duties and responsibilities we fulfill. We do not discriminate; we act equally and fairly. We provide equal employment and development opportunities regardless of gender, age, physical disability, etc.

4. RESPECT FOR INTELLECTUAL PROPERTY RIGHTS

Sempro's trademarks and logos are legally protected. We hold intellectual property rights in high regard, and we comply with all laws and regulations to ensure respect for the intellectual property of our customers, business partners, and competitors.

5. COMPLIANCE POLICY

The related Compliance Policy is available here [\[link here\]](#).

6. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

The related Anti-Bribery and Anti-Corruption is available here [\[link here\]](#).

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7. INFORMATION SECURITY AND MANAGEMENT

Due to the nature of our work, Sempro employees handle and create a wide variety of information every day. Recognizing the importance of information security, we rigorously manage and safeguard all information we create or obtain to ensure its confidentiality and integrity. The Information Security Policy is available here [link here].

8. SOCIAL MEDIA AND WEBSITE

Sempro actively uses social media accounts. Sempro employees are prohibited from making statements and expressing opinions on Facebook, Twitter, LinkedIn, Instagram, etc. on behalf of Sempro, except with the knowledge/approval of the General Manager.

Employees are responsible for the coordination of the preparation and updating of the Sempro website with the authorization given by the General Manager. The content of the website is intended for those who wish to obtain information about the Sempro and is constantly updated.

The majority of the information on the website is provided in both Turkish and English; current information and retrospective news are also available on the website.

The Company's social media accounts and website are as follows:

- Facebook: <https://www.facebook.com/SemproDanismanlik/>
- LinkedIn: <https://www.linkedin.com/company/sempro-dan%C4%B1%C5%9Fmanl%C4%B1k-ltd-%C5%9Fti?trk=biz-companies-cym>
- Instagram: <https://www.instagram.com/semprodanismanlik/>
- Twitter: <https://twitter.com/SemproLtd>
- Website: <https://www.sempro.com.tr/>
- YouTube: [semprodansmanlkmuhendislik7714](https://www.youtube.com/channel/UC7714semprodansmanlkmuhendislik)

Sempro does not have any social media accounts or websites other than these accounts. Information sharing is performed through these accounts.

9. OCCUPATIONAL HEALTH, SAFETY, ENVIRONMENT AND SUSTAINABILITY MANAGEMENT

Occupational Health, Safety, Environment and Sustainability Management policy is available here [link here]

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