



As a law firm, we are devoted defenders of the rights stipulated in the Declaration, especially the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights (Art. 8), the equality to a fair and public hearing by an independent and impartial tribunal (Art. 10), the presumption of innocence (Art. 11), the right to own property (Art. 17), the right to freedom of opinion and expression (Art. 19), the right to social security (Art. 22), the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment (Art. 23), and the right to rest and leisure (Art. 24).

## **Implementation**

### **Description of concrete actions to implement Human Rights policies, reduce Human Rights risks and respond to Human Rights violations.**

In addition to contributing to the effective exercise of the aforementioned rights by our clients when and where applicable as lawyers, ELIG, Attorneys-at-Law respects and abides by these rights in its own conduct and operations. The lawyers and employees working together at ELIG, Attorneys-at-Law enjoy the rights stipulated in Articles 19, 22, 23 and 24. The human resources practices we have in place emphasize and apply the universally accepted principles of human rights.

## **Measurement of outcomes**

### **Description of how the company monitors and evaluates performance.**

The performance of the implementation of the Principles 1 and 2 are closely monitored by the two Managing Partners, five partners and one of counsel of ELIG, Attorneys-at-Law.

There are no investigations, legal cases, rulings, fines or other relevant events related to Human Rights regarding, including or against ELIG, Attorneys-at-Law.

## **Labour Principles**

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation

## **Assessment, Policy and Goals**

### **Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities).**

### **Description of written policies, public commitments and company goals on labour rights.**

ELIG, Attorneys-at-Law strives to raise awareness among our clients with regards to the freedom of association, the right to collective bargaining, elimination of forced, compulsory and child labour and elimination of discrimination of employment and occupation.

We recommend to our clients, when and where applicable, that they incorporate labour-related provisions in their agreements with third parties in order to expand the application of these principles, to prevent forced labour, child labour and discrimination in respect of employment and occupation and to promote the freedom of association and the right of collective bargaining. These provisions refer to the Turkish labour legislation which is in line with the universal labour principles.

## **Implementation**

### **Description of concrete actions taken by your company to implement labour policies, reduce labour risks and respond to labour violations.**

ELIG, Attorneys-at-Law provides internal trainings to its lawyers and employees on a regular basis. These trainings include the topics of labour law and labour policies. All of our lawyers and employees are provided with the compulsory Social Security insurance as well as with a more comprehensive private health insurance. Our offices are regularly inspected by workplace safety professionals to prevent all kinds of accidents that may occur in a workplace.

We profoundly respect the opinions of our lawyers and employees. Our lawyers and employees are encouraged to express their suggestions and opinions freely and directly to their senior associates and senior managers in an open and friendly environment.

Our remuneration practice strictly excludes any kind of discrimination and all lawyers and employees receive proportionate remuneration for comparable work.

The performance of the implementation of the Principles 3, 4, 5 and 6 are closely monitored by the two Managing Partners, five partners and one of counsel of ELIG, Attorneys-at-Law.

## **Measurement of outcomes**

### **Description of how the company monitors and evaluates performance.**

ELIG, Attorneys-at-Law has never faced any labour-related investigation, rulings or fines since its establishment in 2005. While as a law firm, we employ Turkish-qualified lawyers able to practice law in Turkey, we encourage non Turkish-qualified colleagues to work at ELIG, Attorneys-at-Law as counsels for the sake of diversity. We do not discriminate in any form whatsoever between our Turkish and non-Turkish colleagues. 32 men and 44 women work together at ELIG, Attorneys-at-Law.

At ELIG, Attorneys-at-Law, we pay utmost attention and take into consideration the opinions of our lawyers concerning our labour policies received during periodic performance reviews to ameliorate our colleagues' working conditions.

External workplace safety audits are carried out periodically and we comply with the recommendations of the auditors at all times.

### **Environmental Principles**

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies

### **Assessment, Policy and Goals**

**Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.**

ELIG, Attorneys-at-Law allocates part of our annual income to contribute to the protection of the environment. We have contributed to the creation of the İzmir Urla Memorial Forest by donating 2000 young trees to TEMA (the Turkish Foundation for Combating Soil Erosion, for Deforestation and the Protection of Natural Habitats) and 2000 young trees to the Middle East Technical University forest.

Each individual office at ELIG, Attorneys-at-Law premises has a paper recycling box, in addition to the glass recycling boxes located at our premises. Our lawyers and employees are encouraged and periodically reminded to dispose of their paper and glass waste using these recycling boxes.

ELIG, Attorneys-at-Law ensures that its lawyers and employees are conscious of their use of all valuable resources such as water, paper and electricity. This is a permanent policy of our firm.

We are looking forward to making more donations for the reforestation of Turkey in the upcoming year and we are also aiming to reduce our consumption of valuable resources to the largest extent possible.

### **Implementation**

**Description of concrete actions to implement environmental policies, reduce environmental risks and respond to environmental incidents.**

We pay utmost attention to select environment-friendly office supplies and equipment. We keep the number of office printers low to the largest extent possible.

Our lawyers and employees are periodically reminded to reduce their paper, electricity and water consumption and the recycling opportunities mentioned above are in place.

The performance of the implementation of the Principles 7, 8 and 9 are closely monitored by the two Managing Partners, five partners and one of counsel of ELIG, Attorneys-at-Law.

### **Measurement of outcomes**

#### **Description of how the company monitors and evaluates environmental performance.**

With our abovementioned contributions, we played a role in the reforestation of Turkey.

Using environment-friendly office supplies and through awareness-raising among our lawyers and employees, we significantly reduced our rate of consumption.

The performance of the implementation of the Principles 7, 8 and 9 are closely monitored by the two Managing Partners, five partners and one of counsel of ELIG, Attorneys-at-Law and periodically reminded to our lawyers and employees.

### **Anti-Corruption Principles**

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

### **Assessment, Policy and Goals**

#### **Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.**

ELIG, Attorneys-at-Law takes pride in our clean conduct commitment. As a law firm, we publish the highest number of anti-corruption and anti-bribery articles in Turkey (both in English and Turkish) and we ensure these articles are circulated widely through all channels available to us. A list of our publications can be found attached.

Our commitment to clean conduct is published on our website and can be found below.

### **Declaration on Promotion of Clean Conduct**

“ELIG, Attorneys-at-Law fully understands and notes the importance of abiding by local laws and international conventions to fight corruption, which is damaging to legitimate legal interests. In that respect, ELIG, Attorneys-at-Law values its reputation for top quality legal services. The firm warrants and represents that all transactions engaged by its lawyers and employees on behalf of ELIG, Attorneys-at-Law, or its clients, are in full compliance with the relevant regulations, that none of its employees offer, promise, authorize, solicit or accept any undue pecuniary or other advantage (or imply that they will or might do any such thing at any time in the future) in any way connected with any of its transactions with public officials and that it has taken reasonable measures to prevent its agents or any other third parties, subject to its control or determining influence, from doing so.

ELIG, Attorneys-at-Law also warrants and represents that it is committed to the highest standards of transparency and accountability, and renders its legal services in a responsible,

open and transparent manner. All employees working at ELIG, Attorneys-at-Law, or to be hired by ELIG, Attorneys-at-Law, agree and acknowledge to fully abide by the law firms' ethical conduct policy and its efforts at transparency and to report any possible offer, solicitation and/or action violating these policies to the managing partner immediately. Everyone at ELIG, Attorneys-at-Law has an obligation to act with integrity and understand and comply with this policy. ELIG, Attorneys-at-Law is committed to the absolute prevention of bribery and corruptive practices in order to reassure our clients, attorneys and judiciary, and has a zero tolerance policy on bribery and corruption issues. We take pride in our reputation and the values of our law firm, the ethical values of each of our attorneys and our collective commitment to acting with integrity. We encourage Turkish law firms and businesses to make this declaration public on their own behalf, and thereby take a step in the direction of a cleaner, more transparent and merits-based future.”

All persons recruited by ELIG, Attorneys-at-Law are briefed this declaration at the beginning of their employment.

As ELIG, Attorneys-at-Law, we provide consultancy to the largest industry and business association in the fight against corruption in all forms. We are proud members of the International Bar Association Anti-Corruption Committee, Ethics and Reputation Association and Corporate Governance Association of Turkey. We cooperate with Transparency International's Turkish branch to promote transparency and therefore to reduce corruption.

We promptly provide our new clients and their employees with an anti-corruption and anti-bribery training and repeat the same with our existing clients on a regular basis.

As the founding partner of and head of the Regulatory Affairs at ELIG, Attorneys-at-Law, our Founding Partner, Att. Gönenç Gürkaynak, Esq. is proudly acting as the co-chair of the Anti-Corruption Task Force of the B20 Summit 2015 presided by Turkey.

## **Implementation**

### **Description of concrete actions to implement anti-corruption policies, reduce anti-corruption risks and respond to incidents.**

We provide anti-corruption compliance training to our lawyers and employees as well as the employees of our clients on a regular basis.

The Regulatory and Compliance department of ELIG, Attorneys-at-Law closely monitors the implementation of our abovementioned policy.

ELIG, Attorneys-at-Law works in close coordination with the leader industry and business associations, and other civil society organizations, in promoting collective action on anti-corruption.

## **Measurement of outcomes**

### **Description of how the company monitors and evaluates anti-corruption performance.**

By providing anti-corruption consultancy and trainings, and publishing articles on anti-corruption on many platforms, we contribute to raising anti-corruption awareness among businesses, employees and the society in general. This way, we aim at creating a clean conduct environment in Turkey and therefore support the fight against corruption.