



GÜN + PARTNERS
AVUKATLIK BÜROSU

UN GLOBAL COMPACT
COMMUNICATION ON PROGRESS
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GENERAL

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Gün + Partners is a full-service institutional law firm with a strategic international vision, providing transactional, advisory and dispute resolution services. It is one of the oldest and largest law firms in Turkey and is internationally recognised among the top tier legal service providers in the country. The Firm is based in Istanbul, with working and correspondent offices Ankara, İzmir and the major commercial centres in Turkey. The Firm advises a large portfolio of clients in numerous fields of activity, including life sciences, energy, construction & real estate, logistics, technology, media and telecoms, automotive, FMCG, chemicals and the defence industries. All lawyers work in Turkish and English and majority of them also offering fluency in German and French.

Statement of continued support

01/10/2018

To our stakeholders:

I am pleased to confirm that Gun + Partners Law Firm reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Mehmet Gün

Founding Partner of Gun + Partners

I. HUMAN RIGHTS PRINCIPLES

- **Principle 1:** *Businesses should support and respect the protection of internationally proclaimed human rights; and*
- **Principle 2:** *make sure that they are not complicit in human rights abuses.*

Assessment, Policy and Goals

Gun + Partners prides itself on promoting and showing deference to international standards, especially the Universal Declaration of Human Rights and the European Convention on Human Rights. We believe that it is important to implement the principles that we passionately stand for in our statements and petitions. Therefore, we make sure that all our employees are equal before the law and are entitled without any discrimination to equal protection of the law.

Additionally, our founding partner Mehmet Gün founded the “Better Justice Association” and contributed to the establishment of the “Istanbul Arbitration Association” supporting the principles of equal protection of the law and a right to a fair trial in Turkey.

The Better Justice Association was established to reform the legal and administrative structure of the Turkish Republic, strengthening the state of the rule of law, reinforcing Turkish Judiciary and making positive their effects on the business and social environment. Better Justice Association publishes and follows up policies on “the Proposal for the Establishment of a Higher Judicial Council Structure to Ensure the Independence of the Judiciary”, “Opinion of the Draft Law on Court Appointed Experts” and “Full and Frank Disclosure in the Turkish Civil Procedure”. The idea for the “Better Justice Association” was first introduced in 2014 by Mehmet Gün in his autobiographical book “From Bozkır to the World: Becoming a Lawyer”. Subsequently Mehmet Gün revisited the ideas of judicial independence and accountability of the judiciary, as well as the need for reform in accordance with the Rule of Law, in his book entitled “Turkey’s Issues with Middle Democracy and the Solutions Thereof: Judiciary, Accountability, Fair Representation” published in April, 2018.

In a similar manner, the Istanbul Arbitration Association (ISTA) aims to explain the advantages of Istanbul as an “arbitration centre”, to improve on these advantages and to help popularize arbitration throughout Turkey. In order to stimulate Istanbul’s great potential, ISTA is pursuing various promotional and networking efforts such as collaborations, country guides, and international arbitration activities with broad participation, an effective list of arbitration practitioners and a website. ISTA has also assumed an important mission for fair, honest and speedy adjudication by leading the charge on establishing ethical codes and qualification criteria for arbitration law in Turkey. It aims to contribute to relieving the commercial litigation workload imposed on the Courts by way of encouraging settlement of commercial disputes through arbitration. Finally,

ISTA aims to support investment in Turkey by providing the opportunity for good dispute resolution. According to the calculations made by ISTA, the popularization of arbitration and bringing Istanbul to the fore as an arbitration centre could bring back an approximately 1 billion US Dollar that is spent abroad on international arbitration.

Finally, Mehmet Gün has co-authored the book titled “How Unconstitutional is the Privileged Immunity of Experts?”, wherein he and his colleagues challenged the regulations concerning legal immunity and exclusion of liabilities as granted to the panel of experts and criticised the dominant position of experts as a legal institution in Turkey.

Implementation

In order to promote an environment where employees feel their freedom of expression is protected, Gun + Partners implements the speak-up system in which there are designated speak-up delegators and the lawyers of our firm can “speak-up” to them about any matter they feel is against their personal rights or rights as an employee. This setting of healthy communication is emphasized through the convening of Common Wisdom Meetings in which every single employee of our firm, despite their seniority and including secretaries and staff is given a platform to share their views or comments regarding the upcoming policies and goals of our firm.

As the Chairman of the Executive Board of the Better Judiciary Organization, Mehmet Gün made a presentation regarding the Proposal for the Establishment of a Higher Judicial Council Structure to Ensure the Independence of the Judiciary during the “Independence of Judiciary Following the Constitutional Amendment” panel dated 15 November 2017. The presentation pointed out the *de facto* dependence of the Supreme Board of Judges and Prosecutors (“HSK”) on the executive powers, such as the Minister of Justice, in performing its supervisory functions; as well as proposing an alternative to the competence of the executive by introducing a Higher Judicial Council. This proposed council is envisaged to have an inclusive election process, ensuring the representation of all segments of the society.

As mentioned above, Istanbul Arbitration Association (ISTA), the founding chairman of which is Mehmet Gün, focuses its activities on ensuring that arbitration practices in Turkey are conducted in a fair, efficient and productive manner, and in conformity with high ethical values. For that purpose, ISTA Arbitrator Ethics Rules were introduced to bridge an important gap and these Rules were adopted as a pre-condition for acceptance to the list of ISTA Arbitration Practitioners. Additionally, ISTA continues its activities to make a comprehensive list of arbitration practitioners. It has determined and announced the required qualifications. This list is aimed to bring visibility, high recognition and credibility to the arbitration practitioners both from Turkey and overseas countries. Furthermore, ISTA conducts activities so that arbitration is preferred for settlement of disputes and particularly İSTAÇ and other arbitration organizations based in Istanbul are preferred for arbitration services. ISTA carries out relevant activities through its commissions; namely,

“Arbitration and Training”, “Activities and Publications”, “Promotion and Cooperation”. All members are welcome to take part in the Commission activities.

Measurement of Outcomes

Our employees report feeling that their freedom of expression is respected, owing to the Common Wisdom Meetings. These meeting did not only raise awareness in creating a democratic model of business but also shown the needs and requirements for our firm in an efficient manner. The speak-up system was also a great success both for the employees and the development of the firm and it has propelled us to prepare and implement a firm policy with regards to the holidays with pay to make sure that our employees enjoy their "right to respect for private and family life".

When it comes to the ISTA, we are proud to say that it has effectively brought arbitration specialists under the same roof with options of individual, institutional and international membership and is currently offering significant advantages to both its members and other arbitration practitioners who do not prefer to become a member. It also offers its members and other practitioners the opportunity to be among those who lead arbitration as a rapidly flourishing sector in Turkey.

II. 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 labor;*
- ***Principle 5:*** *the effective abolition of child labor; and*
- ***Principle 6:*** *the elimination of discrimination in respect of employment and occupation.*

Assessment, Policy and Goals

Gun + Partners has continued to address labor rights within our internal policies. We are a firm that does not condone child labor or discrimination in any work place. Although the legal sector is infamous for lengthy working hours, our firm gives utmost importance to the separation between work and private life and keeping both at the same level. We know that our firm cannot exist without our lawyers and other employees; therefore we give utmost importance to their social and economical welfare.

Regardless of seniority of their position, the majority of our employees are female, who are paid equally as their male colleagues for their work of equal value. Accordingly, our firm takes necessary steps to make their maternity leaves and breastfeeding breaks as convenient and flexible as possible.

Implementation

In order to comply with the UN Labor Principles, we have implemented several different models, systems and activities, the examples of which are provided below:

- We have continued implementing a 360-degree feedback system for our performance evaluations, where the employees are given performance reviews from their subordinates, supervisors and peers as well as providing a self-evaluation
- We provide a discount with a gym, which we have agreed on a yearly basis, for preserving our employees' health.
- We have expanded our Human Resources team within the firm.
- We have allocated matters with regards to labor to two of our partners within the firm.
- We have continued to prepare outing and motivation events for all employees.
- We have provided occupational health and safety educations to all our employees.
- We have agreed with an occupational doctor to be present at the firm one day a week.
- We have implemented the policy of scholarships within the firm, to the lawyers in their master's degrees

Measurement of outcomes

Together with all the improvements stated above, we have become one of the most applied law firms in Istanbul and this shows that we start to be one of the favored law firms in Turkey. Our employees have stated their positive approach to the implemented systems and activities, and we will continue to implement better systems and organize better projects. The 360-degree feedback system has created further clarity and foreseeability for our employees in terms of their performance evaluations and an overall healthy communication in the workplace.

III. ENVIRONMENT

- **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

GUN + PARTNERS continues to take the initiative to protect the global environment and prioritize environmental consideration and awareness. We are committed to meet the standards and comply with any all legislation in this regard. We understand that we must raise awareness among our employees in order to minimize our damage to the natural resources.

Implementation

We have trained all employees in order to raise their awareness with regards to environment. We have calculated our employees' entire carbon footprint by hiring a professional team and we determined ways to reduce the overall carbon footprint of our firm. Accordingly, we have reduced our electricity usage and compensated our carbon footprint by financially supporting the Climate Volunteers-Yuntdağ Wind Power Plant. We have recycling points within our office and with the help of the municipality; we give all our recyclable waste to recycle facilities. We understand that our profession is unfortunately still very much paper-based; however, we try to counteract this disadvantage by urging our employees to reuse paper/documents as much as possible.

Measurement of outcomes

Our carbon footprint has substantially decreased as a result of the above-mentioned measures. Since our training program has significantly raised awareness, we have increased recurrence of the trainings.

IV. ANTI-CORRUPTION

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

Assessment, Policy and Goals

Accountability, efficiency and objectivity are our main principles, both within and outside of our firm. Our clients' success is at the heart of our own success and therefore it is very important to be transparent to our clients. We have a zero-tolerance policy for corruption, bribery and extortion. As we act as the intermediaries of our clients in Turkey and we are subject to relevant advocacy legislations, all of our employees are aware of the risks and sanctions. In the long run, our company goal is to minimize the risk of corruption, bribery and extortion in all areas.

In the recent years, Gun + Partners has also expanded its Business Crimes and Anti-Corruption practice departments which now consist of 3 partners, 2 managing associates and 6 qualified lawyers. These departments provide expertise in anti-bribery & corruption, anti-money laundering, white collar crime, investigation, sanctions and compliance matters and deal with both internal and external investigations. Our firm has Insurance and Reinsurance, Life Sciences, Energy and Natural Resources, Technology, Media and Telecom, Construction and Real Estate, Competition practice groups who deal with implementation and audit of regulatory compliance structures in more a specialized manner.

Implementation

- We have a strict and high-level policy on accountability, therefore and intermediaries of our clients, we sign FCPA and UK Bribery Act declarations showing that GUN + PARTNERS has fully in compliance with the relevant legislation.
- We have implemented a billing system in which we send our statements together with the spreadsheets showing how much time and expense were put into the relevant work/business in the most transparent way.
- We have implemented an expense-reporting system in which it is not possible to show expense without its invoice or other documents in the same nature.
- We continue to provide trainings with regard to the above to all our employees.
- As part of our legal services regarding Compliance, we assist our clients to carry out their internal investigations, and more importantly, give compliance trainings to raise awareness within the organization. We also provide proactive legal assistance in order to comply with regulations in regulated markets and provide insights about extraterritorial effect of laws such as FCPA and UKBA. Given our strong ties with

reputable big law firms in Europe and USA, we team up with UK and US based law firms to handle that kind of matters.

Measurement of outcomes

As a result of our success in the practice area of Anti-Corruption, Gun + Partners has become a Tier 1 law firm under “Compliance” according to the Legal 500 rankings.

While the current implementation of our anti-corruption policies are valid, when it comes to fighting corruption, we know that taking measures are never enough, unless they are implemented to their core. Therefore, we repeat these trainings to every new employee of our firm and document the trainings.

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