

General

Period covered by your Communication on Progress (COP)

From: February 2018

To: May 2019

From: ELIG Gürkaynak, Attorneys-at-Law

To: UN Global Compact

Statement of continued support by the Chief Executive Officer (CEO)

Please provide a statement of your company's chief executive expressing continued support for the Global Compact and renewing your company's ongoing commitment to the initiative and its principles (Please include name and title of the chief executive at the bottom of the statement).

Statement of continued support

10.05.2019

To our stakeholders,

I am pleased to confirm that ELIG Gürkaynak, Attorneys-at-Law 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 share this information with our clients using our primary channels of communication.

Sincerely yours,

Gönenç Gürkaynak, Esq.

Founder and Partner of ELIG Gürkaynak Attorneys-at-Law

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

Description of the relevance of human rights for the company (i.e. human rights risk-assessment). Description of policies, public commitments and company goals on Human Rights.

ELIG Gürkaynak Attorneys-at-Law supports the Universal Declaration of Human Rights (“Declaration”).

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 Gürkaynak Attorneys-at-Law respects and abides by these rights in its own conduct and operations. The lawyers and employees working together at ELIG Gürkaynak 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.

We ensure that there is no discrimination during our recruitment processes. We support gender equality. Currently there are 72 women and 31 men working at ELIG Gürkaynak Attorneys-at-Law. Of the 12 partners and counsels, 7 are women and 5 are men.

Our founding partner, Gönenç Gürkaynak, Esq., is one of the founding members of Yanındayız Association, an association established in 2018, aiming to achieve gender equality in Turkey based on the principles of the Universal Declaration of Human Rights through a mentality and behavioral change.

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 one founding partner, six partners and five counsels of ELIG Gürkaynak 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 Gürkaynak Attorneys-at-Law strives to raise awareness among our clients with regards to the freedom of association, 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 Gürkaynak 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 also have a routine reporting mechanism on potential near – accidents that could have occurred to take the necessary steps to prevent those. Our lawyers receive routine trainings on workplace safety, from authorized professionals. We have a doctor visiting our premises periodically to provide consultancy on health related issues of our employees.

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, counsels and partners 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 one founding partner, six partners and five counsels of ELIG Gürkaynak Attorneys-at-Law.

Measurement of outcomes

Description of how the company monitors and evaluates performance.

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 Gürkaynak 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. 72 women and 31 men work together at ELIG Gürkaynak Attorneys-at-Law.

At ELIG Gürkaynak 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.

Each individual office at ELIG Gürkaynak Attorneys-at-Law premises has a recycling box to be used for paper, plastic, glass and metal recyclables. Our lawyers and employees are

encouraged and periodically reminded to dispose of their recyclable waste using these recycling boxes.

ELIG Gürkaynak 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 also aiming to reduce our consumption of valuable resources to the largest extent possible.

ELIG Gürkaynak Attorneys-at-Law is also one of supporters of Mediterranean Conservation Society.

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 have commissioned office pens and pencils made of bio plastic raw material, which dissolves in nature, recycled paper and non-toxic ink. The pencils also have capsules attached to them, which contain black pine seeds so that the users of the pencils may plant the seeds at their convenience.

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 one founding partner, six partners and five counsels of ELIG Gürkaynak Attorneys-at-Law.

Measurement of outcomes

Description of how the company monitors and evaluates environmental performance.

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 one founding partner, six partners and five counsels of ELIG Gürkaynak 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 Gürkaynak 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. Our publications on anti-corruption related matters can be reached at: https://www.gurkaynak.av.tr/publications/articles-and-periodicals?practice_area=anti-corruption-white-collar-irregularities.

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

Declaration on Promotion of Clean Conduct

“ELIG Gürkaynak 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 Gürkaynak 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 Gürkaynak 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 Gürkaynak 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 Gürkaynak Attorneys-at-Law, or to be hired by ELIG Gürkaynak 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 Gürkaynak Attorneys-at-Law has an obligation to act with integrity and understand and comply with this policy. ELIG Gürkaynak 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 Gürkaynak Attorneys-at-Law are briefed this declaration at the beginning of their employment.

As ELIG Gürkaynak Attorneys-at-Law, we are proud members of the Ethics and Reputation Society, Transparency International Turkey and Corporate Governance Association of Turkey. We cooperate with Transparency International’s Turkish branch to promote transparency and therefore to reduce corruption. Since 2016, our founding partner Gönenç Gürkaynak, has been serving in the national advisory group of the Transparency International Turkey initiative Business Environment Integrity Assessment which aims to create a relevant body of evidence related to business integrity.

In 2018, our founding partner, Gönenç Gürkaynak, Esq and our counsels in the Regulatory and Compliance department gave numerous speeches at multiple conferences and forums under the auspices of various organizations such as Transparency International, on anti-corruption matters. ELIG Gürkaynak is also an active participant in Ethics and Reputation Society’s study group Third Party Risks and Transparency International’s Pharma Sector Cooperation Program. ELIG Gürkaynak Attorneys-at-Law aims to raise awareness and initiate intellectual discussions with regard to topics such as transparency, corruption and freedom of speech. As, ELIG Gürkaynak Attorneys-at-Law, we perceive the anti-corruption field not just as a practice area, but also as a mission to raise general awareness of the Turkish society with regard to corruption.

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

Implementation

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

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

ELIG Gürkaynak Attorneys-at-Law closely monitors the implementation of our abovementioned policy.

ELIG Gürkaynak 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 international and national 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.