



innovative
fast
accurate

2019

...as should be

GÜLER DİNAMİK
COMMUNICATION
ON
PROGRESS



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CEO's STATEMENT

Sustainability and integrity are the highest priorities of our corporate culture

I am pleased to confirm that Güler Dinamik (GD) reaffirms its support of the ten principles of the Global Compact with respect to human rights, labour, environment and anti-corruption.

The Company's inherent value system and principled approach to conducting business in an ethical manner reflects its commitment to corporate sustainability, and pledge to adopt good practices and deliver on its fundamental responsibilities in areas of human rights, labour, environment and anti-corruption.

We believe that the pursuit of excellence also means shaping a more sustainable future for the world and we have the responsibility to align our activity with this ambitious goal.

For this purpose, our Code of Ethics sets out our highest commitments to human rights, labour standards, the environment and the fight against corruption.

We constantly work to integrate these commitments into our activities, with the aim of adding value both within GD and for all external stakeholders.

GD's business strategies, policies and procedures collectively establish a culture of integrity and set the basis for ensuring long term success whilst upholding its basic responsibilities to people and planet.

In 2017 we continued to increase our efforts in terms of sustainability, both internally for key functions and processes and externally in our services and projects. Our twin goals are to minimize the impacts of our operations and support customers by generating positive impacts for their business.

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 the information with our stakeholders using our primary channels of communication

Kenan Güler
Güler Dinamik Gümrük Müşavirliği A.Ş.
Chairman and CEO



GD's APPROACH TO INTEGRITY AND SUSTAINABILIT



GD is evolving and growing rapidly.

We therefore have a constant need to look at sustainable solutions and take a structured approach in the conduct of our business. This allows us to develop and deliver new services that have a positive impact on society as well as the environment.

We are committed to embed sustainability as one of the key drivers of our business strategy and to ensure this approach is reflected in the services we deliver to our clients. We actively support the 10 Principles of the UN Global Compact relating to human rights, labour standards, the environment and the fight against corruption. We report and communicate annually to our stakeholders on progress made to implement these principles.

Our path towards sustainability involves a number of internal initiatives designed to increase awareness of more sustainable ways to approach our business and carry out our activities, as well as to develop innovative services that generate positive impacts for our stakeholders and for our customers' projects and businesses.

We have enhanced our approach to integrity, through our ethical culture of doing business, formalised in four pillars: Governance, People, Planet and Innovation.

We want our stakeholders to feel confident that we do our best to manage our social, environmental and economic impacts. We maintain a proactive and transparent dialogue with our stakeholders to better understand their expectations and build shared values.

The integrated Enterprise Risk Management (ERM) framework that we have adopted takes into account strategic, financial, operational and compliance risks as well as environmental, social and governance (ESG) criteria. The aim is to drive continuous improvement in each of these areas.

GD is engaged in rule development processes within a number of technical associations, committees and working groups, at both the national and international level, with the purpose of sharing research, results, technical knowledge and best practices.

At the nucleus of our corporate integrity programme is...

RESPECT

RESPECT

We respect our corporate culture by:

- integrating sustainability into our global business activities;
- creating long-term value;
- increasing returns for investors and shareholders;
- ensuring the highest level of integrity;
- fighting against any form of fraud and corruption;
- following fair and correct business practices;
- following international best practices.

We respect our people by:

- respecting human rights in our organisation and supply chain;
- respecting labour organisation principles;
- meeting health and safety regulations;
- creating a safe, participatory and inclusive workplace;
- banning any discrimination in respect of employment and occupation;
- considering diversity as an opportunity and meritocracy as a must.

We respect our planet by:

- meeting environmental protection regulations;
- increasing energy efficiency;
- reducing CO2 emissions;
- minimising and mitigating any environmental impacts;
- creating value in local communities;
- sharing social values with our stakeholders.





ABOUT THIS REPORT

This report reflects our self-assessment on how we work to continuously meet the UN Global Compact Active Level criterion.

It includes some of our initiatives to ensure a sustainable business-oriented approach.

GD is committed to communicating on an annual basis its advancements and developments towards the goals' realisation. The report is publicly available on the GD website: www.gulerdinamik.com.tr

GD welcomes questions, comments and feedback from all its stakeholders.

Please contact www.gulerdinamik.com.tr

The 17 Sustainable Development Goals (SDGs) define global sustainable development priorities and aspirations for 2030 and seek to mobilise global efforts around a common set of goals and targets.

The SDGs call for worldwide action among governments, business and civil society to end poverty and create a life of dignity and opportunity for all, within the boundaries of the planet.



SUSTAINABLE DEVELOPMENT

17 GOALS TO

1 NO POVERTY

A white icon of a family consisting of two adults and two children, one of whom is using a cane, set against a red background.

2 ZERO HUNGER

A white icon of a bowl with three wavy lines above it representing steam or heat, set against a gold background.

3 GOOD HEALTH AND WELL-BEING

A white icon of a heartbeat line with a heart symbol at the end, set against a green background.

7 AFFORDABLE AND CLEAN ENERGY

A white icon of a sun with a power button symbol in the center, set against a yellow background.

8 DECENT WORK AND ECONOMIC GROWTH

A white icon of a bar chart with an upward-pointing arrow, set against a maroon background.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

A white icon of three stacked cubes, set against an orange background.

13 CLIMATE ACTION

A white icon of an eye where the pupil is a globe of the Earth, set against a dark green background.

14 LIFE BELOW WATER

A white icon of three wavy lines representing water above a fish, set against a blue background.

15 LIFE ON LAND

A white icon of a tree, two birds in flight, and a path, set against a light green background.

SUSTAINABLE DEVELOPMENT GOALS

TRANSFORM OUR WORLD

4 QUALITY EDUCATION



5 GENDER EQUALITY



6 CLEAN WATER AND SANITATION



10 REDUCED INEQUALITIES



11 SUSTAINABLE CITIES AND COMMUNITIES



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



17 PARTNERSHIPS FOR THE GOALS



SUSTAINABLE DEVELOPMENT GOALS



GD AT A GLANCE



Güler Dinamik Gümrük Müşavirliği Anonim Şirketi (Guler Dinamik Customs Consultancy Inc. Co.) | GD gives customs consultancy and foreign trade consultancy services within the scope of the legal rights stated in the Customs Regulation and Customs Law numbered 4458 via its 33 Customs Brokers, 119 Assistant Customs Brokers, 106 Candidates for Associate Customs Brokers (Intern) and 112 employees in other departments in total 370 employees.

Güler Dinamik, headquartered in Istanbul, has 24 branches and liaison offices in 11 provinces.

Güler Dinamik, adopting the principles for sustainability of the behavior as well as sustainability of the services and solutions;

Signatory of United Nations Global Compact, Member of Turkish Ethics and Reputation Society (TEID) and Signatory of "Membership Declaration of TEID"; Member of Istanbul Customs Brokers Association (IGMD) and Signatory of Customs Brokers Declaration of Ethics; has TRACE Certificate, which has a significant role in conducting the transparent trade and the international validity within the scope of ethics and adaptation and anticorruption approaches, and ISO 37001 Anti-Corruption Management System Certificate; In parallel with the Ethics and Harmonization studies, the experiences of Güler Dinamik, "Integrity-building experience of Guler Dinamik Customs Consultancy Inc." have been published in the Regional Report of 2016 OECD.

Güler Dinamik, has the systems that meet most of the Industry 4.0 Principles today, thanks to the studies managing for many years. G&D continues to raise the service quality by keeping the technology at top with the time saving applications for the customers by producing the best solutions.

Güler Dinamik has adopted the standards of "Integrated Management Systems" in order to maintain the provided services in accordance with the International Quality Management Systems conditions.

- ISO 9001 Quality Management System Certificate,
- ISO 14001 Environmental Management System Certificate,
- ISO 22301 Societal Security & Business Continuity System Certificate,
- ISO 27001 Information Security Management System Certificate,
- ISO 20000-1 IT Service Management System Certificate,
- OHSAS 18001 Occupational Health & Safety Certificate and
- ISO 37001 Anti-Corruption Management System Certificate.
- ISO 10002 Customer Satisfaction Management System Certificate,

There are available A and C Class of Occupational Safety Specialists within the Directorate of Management Systems for follow-up and coordination of works related to Occupational Health and Safety within the scope of Occupational Health and Safety Law Numbered 6331 and OHSAS 18001 Standard.

Güler Dinamik, taking part in the afforestation activities managed by Tema Foundation by donating saplings for the future generations who will protect the natural assets of our country, has donated 31.793 saplings from 2015 to 2017 within the scope of ISO 14001 Environmental Management System.

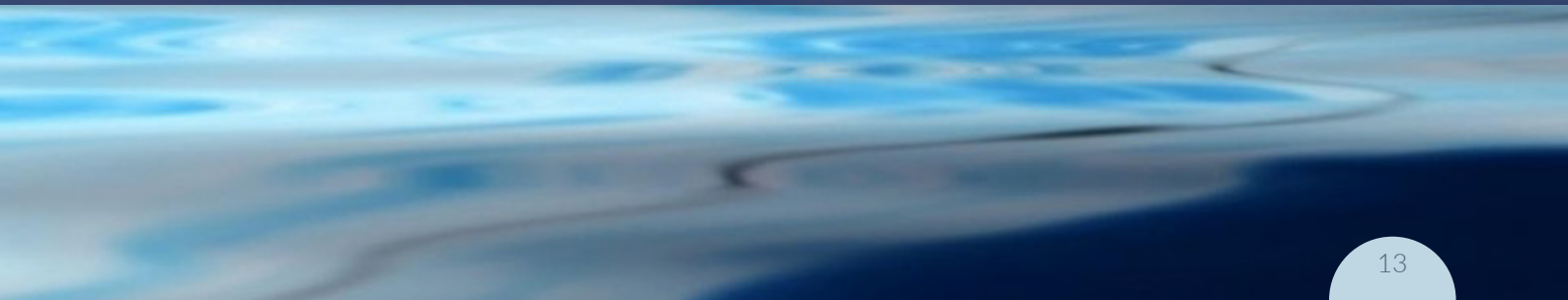
Güler Dinamik is a member of;

- IGMD (Istanbul Association of Customs Consultants)
- IZMGMD (Izmir Association of Customs Consultants)
- AGM (Ankara Association of Customs Consultants)
- BUGUMDER (Bursa Association of Customs Consultants)
- MERGUMDER (Mersin Association of Customs Consultants)
- BCCT (British Chamber of Commerce Turkey)
- TGSD (Turkish Association of Clothing Industries)
- TEID (Turkish Association of Ethics & Reputation)
- TEDAR (Supply Chain Management Association)
- Industry 4.0 Platform and
- DIGIT4TURKEY Digitalization and Industry 4.0 Association.

Continues to add value both to Customs Brokerage Profession and to our Country with its dynamic energy.



THE UNGC 10 PRINCIPLES



HUMAN RIGHTS

Businesses should support and **RESPECT THE PROTECTION** of internationally proclaimed human rights; and make sure that **THEY ARE NOT COMPLICIT** in human rights abuses.

LABOUR

Businesses should uphold the freedom of association and the effective recognition of the right to **COLLECTIVE BARGAINING**; the elimination of all forms of **FORCED AND COMPULSORY LABOUR**; the effective abolition of **CHILD LABOUR**; and the **ELIMINATION OF DISCRIMINATION** in respect of employment and occupation.

ENVIRONMENT

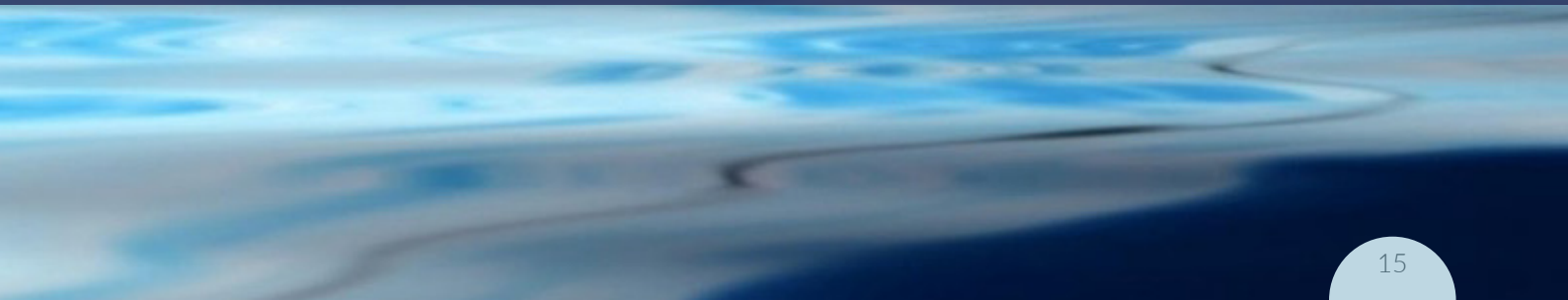
Businesses should support **A PRECAUTIONARY APPROACH** to environmental challenges; undertake initiatives to promote **GREATER ENVIRONMENTAL RESPONSIBILITY**; and encourage the development and diffusion of **ENVIRONMENTALLY FRIENDLY TECHNOLOGIES**.

ANTI-CORRUPTION

Businesses should work **AGAINST CORRUPTION** in all its forms, including extortion and bribery.



OUR COMMITMENT



Human Rights Principles

Principle 1: Business should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuse.

Policy & Goals

GD actively supports the Universal Declaration of Human Rights. We do not engage in business with any countries or organisations where human rights fail to be respected and unacceptable methods are used e.g. exploitation, torture, politically motivated disappearances, slavery and child labour.

Our Directors ensure we protect the human rights of our employees through establishing and implementing various policies that support our company values.

GD has an Ethical Employment Policy which provides a working environment that protects the rights of all employees and individuals. The Policy is designed to encourage, value and manage diversity and to ensure everyone is treated with respect and dignity.

GD is committed to promoting and valuing diversity in all areas of recruitment, employment, training and promotion. It strives to maintain an environment that is based on merit and inclusiveness. It guards against all forms of discrimination and harassment and is committed to ensuring all employees can develop their full potential, irrespective of race, gender, marital status, sexual orientation, disability, age, political opinion, religion, and belief, ethnic or national origin.

GD has a Combatting with Bullying and Harassment Policy and is committed to ensuring that all employees are treated fairly and with respect. GD forbids all forms of harassment in the course of employment including that committed by third parties and seeks to ensure that the working environment is comfortable for all its employees.

Implementation

GD has a Human Recourse Policy which reflect our pro-active state on human rights. Staff consultations are conducted where organisational changes are being implemented to ensure staff are informed and have an opportunity to influence outcomes. GD's Ethics Code covers policies concerning our employee rights which are founded on sound business practice and legislative requirements.

Every effort is made to ensure that our third parties re to comply with the Universal Declaration of Human Rights. We evaluate all partners and suppliers against a set of defined principles, policies and guidelines.

Measurement

All policies are reviewed for suitability, sustainability and effectiveness on an annual basis or sooner should a significant change occur. These reviews are formally recorded.

GD has never been subject to any investigation, legal cases or incidents involving Human Rights violations.

Labour Principles

Principle 3: Business 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

Policy & Goals

It is GD's policy to provide employment, training, promotion, pay, benefits and other conditions of employment without regard to race, gender, marital status, sexual orientation, age, political opinion, religion, belief, ethnic or national origin or disability unrelated to an individual's ability to perform essential job functions. It is also the company's policy to conform to all employment standards by law.

GD affirms with its "Fight with Child and Forced Labor Policy" its support of the International Labour Organisation (ILO) Core Conventions and will not do business with any organisation that uses forced or child labour, and within its own business promotes opportunities for people of all genders to obtain decent and productive work, in conditions of freedom, equity, security and dignity.

All GD employees are issued with a contract of employment which clearly states their terms and conditions including pay rates, holidays and sickness entitlement.

All employees are issued with a Company Handbook which includes information on standard terms and conditions of employment, company benefits, company rules, grievance and disciplinary procedures.

GD also has a robust induction program which introduces employees into the ethos of the company, including its commitment to Corporate Social Responsibility and the importance of the 10 Principles of the UN Global Compact.

In addition, GD provides detailed guidelines on Health and Safety items such as risk assessments, identified hazards and the procedures in place to reduce or eliminate risks.

Implementation

GD is ISO9001 – Quality Management and ISO37001 certified and has a wide range of policies supporting best practice in terms of labour and employment including; Equality and Diversity Policy, Performance Appraisal Policy and Whistleblowing Policy, Code of Ethics, Ethical Employment Policy.

To enable seamless integration of new and emerging standards across the business GD has developed an Integrated Management System which incorporates all policies, processes and procedures required to support key compliance requirements including ISO9001 and other ISO standards, best practice guidelines and other industry requisites.

Formal meetings regarding all compliance and Health and Safety matters are held bi-annually to review cur-

rent policies and discuss any issues or concerns.

The meetings are formally recorded and the minutes are available for all to read.

Measurement

GD consults with staff on a regular basis through: annual reviews where staff are encouraged to define their own objectives and goals, through annual internal staff suggestion surveys where feedback is gathered about various aspects of the business including HR Policies, and through annual company updates where the CEO and executive team members provide an update on the past business year, achievement made and business projection for the following year.

GD has not been involved in any investigations, legal cases or other relevant events related to the contravention of the Global Company Labour principle.

GD has not been subject to any health and safety statutory notices or prosecutions.

Environmental Principles

Principle 7: Business should support a precautionary approach to environmental changes;

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

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Policy & Goals

GD is ISO14001 – Environmental Management accredited and has a wide range of policies supporting best practice in terms of environmental management and minimising any adverse environmental impact.

GD promotes the use of environmentally sound resources, discourages wasteful and damaging practices and continues with initiatives to promote greater environmental responsibilities through implementation of a detailed and comprehensive Environmental Policy.

Being mostly office based, the nature of GD's business makes our environmental impacts relatively small however we are keen to ensure continued commitment to internal policies and controls.

Implementation

In context of our Environmental, Legal and Communication Aspects Policy, environmental aspect and impacts along with company environmental objectives, targets have been documented which are reviewed and audited annually with results reported at the Integrated Management Meetings.

Climate Control – GD Technology has identified the responsibilities relating to the provision and use of energy services and we encourage all employees to take reasonable measures to conserve energy.

Energy efficiency measures include: automatic controls of heating; automatic light switches; good housekeeping measures such as switching off PCs and other office equipment.

Measurement

In the last year GD achieved their target of reducing fuel consumption by 5%. This was achieved by using technologies available to use like conference calling, tele- and video-conferencing and the ability for individuals to home-work. GD has also offset its carbon footprint consumption by 10% by replenishing the environment, planting trees in a memorial garden for neo-natal babies.

GD has never had a reportable environmental incident, and would not expect to, given the nature of our operations. We have never been subject to any statutory notices or prosecutions.

Anti-Corruption Principles

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

Policy & Goals

GD is ISO 37001 certified and it is GD's policy to conduct all of our business in an honest and ethical manner. The company takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery. GD supports the UN Convention.

GD will uphold all laws relevant to countering bribery and corruption and is compliant with the Bribery Act 2010.

Implementation

GD's Anti-Corruption and Bribery Policy sets out clearly exactly what could be considered bribery in terms of business operation including receiving gifts and hospitality with the CCO (Chief Compliance Officer) being ultimately responsible for anti-corruption within the company.

All employees are subject to a robust induction process which covers the Company's Anti-Corruption and Bribery Policy, and all employees who are required are subject to formal Disclosures & Barring Service checks during their probation and then at regular intervals to ensure the integrity of their background and suitability for employment.

Through ISO27001 internal and external audits, the Data Protection Policy is regularly reviewed with all staff being trained annually on the requirement to protect personal data.

GD ensures that monetary values are checked under the responsibility of the CCO with a prior check by the Finance Director.

GD will continue to audit our suppliers to ensure they are ethically trading and not involved in any unethical practices.

Measurement

All GD employees go through rigorous checks on induction including proof of citizenship and DBS checks where required which reduces our exposure to risk of corruption.

Audited accounts are verified by external auditors each year and submitted to Companies House.

GD has not been involved in any legal cases, rulings or other events related to bribery and corruption..

Whistleblowing Hotline

In 2017, GD implemented a whistleblowing platform to enhance the channels of communication available to all internal and external stakeholders. Acting as a form of grievance mechanism, it can be used to report alleged violations of the GD Ethical Code, with specific reference to human rights. The platform is freely available on the GD website, along with information about the procedure.

Privacy and the KVKK

The Private Data Protection Regulation (KVKK), the regulatory change affecting the digital economy, took effect in Turkey in 2017.

In 2017, a Working Group was created to define the implementation steps, including a series of interviews with all those responsible for relevant processes across GD. We have consequently implemented all technical and organisational measures needed to ensure a level of security appropriate to the risks identified, as well as a programme for continuous improvement.

IT security

GD is strongly committed to IT security. Due to the nature of our business, we continuously strive to strengthen the protection of privacy, confidential information and intellectual property. We have developed an IT Security Policy based on the ISO 27001 standard and in compliance with the applicable Turkish law on information security and the protection of the privacy and personal data.

The policy and procedures attest to the importance that GD places on the protection of the information managed within its IT systems. They represent a commitment to implement all reasonable organisational and technical measures to mitigate the growing risks in the area of cyber security.

At least once a year, a vulnerability assessment (VA) and a penetration test (PT) are carried out to test the effectiveness of our system and procedures. Any reported findings are used to guide plans and investments aimed at continuously improving the security of internal information, as well as data belonging to our clients. Our procedures are based on the wide range of certification and support services we offer clients in this area.

Supply chain

GD is actively improving its human rights impact assessment in order to adequately identify and address actual and potential adverse impacts on human rights. GD suppliers are mainly consultants, practitioners and suppliers of goods and services. Although the level of potential risk identified in our supply chain is very low, we nevertheless continuously improve our qualification process to account for criminal, social, combating with corruption and human rights aspects. dardise activities and strengthen control.



GÜLERDİNAMİK

Güler Dinamik Gümrük Müşavirliği A.Ş.

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