

NETAŞ COP

I. Human Rights

- Principle 1 - Businesses should support and respect the protection of internationally proclaimed human rights
- Principle 2 - Make sure that they are not complicit in human rights abuses
- Women and Gender Equality
- Children's Rights
- Indigenous Peoples
- Persons with Disabilities
- Human Trafficking

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.

Suggested topics.

- Reference to (statement of support for) the Universal Declaration of Human Rights or other international standards
- Written company policy on respecting Human Rights and preventing potential abuses (e.g. in code of conduct)
- Policy requiring business partners and suppliers to adhere to the Global Compact principles on Human Rights
- Assessment of Human Rights related risks and impact in industry sector and country(ies) of operation (see Risk Assessment Report at The Human Rights and Business Project)
- Specific goals in the area of Human Rights for the upcoming year

In recruitment processes, recruitment processes are carried out by considering the criteria specified in Article 5 (Equality Principle) of the Labor Law No. 4857.
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Implementation

Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.

Suggested topics...

- Suggestion box, call center or grievance mechanisms
- Awareness raising or training of employees on Human Rights
- Consultation with stakeholders and affected parties
- Allocation of responsibilities for the protection of Human Rights within the company
- Human resource policies and procedures supporting Human Rights

Employee demographic information is submitted to the senior management on a monthly basis and demographic data is reviewed by the management. In addition, the number of disabled employees is determined and monitored within the framework of legal obligations.

Measurement of outcomes

Description of how the company monitors and evaluates performance.

Suggested topics...

- Specific progress made in the area of Human Rights in the past reporting period
- Information about how the company deals with incidents of Human Rights violations
- Investigations, legal cases, rulings, fines and other relevant events related to Human Rights
- Periodic review of results by senior management
- External audits of Human Rights performance

We have not received any penalties, lawsuits etc. regarding human rights so far. We carry out our processes in accordance with standard business principles.

There is no external audit on human rights. However, the number of disabled employees is followed by İşkur.

During the pandemic period:

- We have continued our townhall and management meetings under the direction of our CEO to equalize the level of knowledge within the company.
- Special kits, which include mask and disinfectant, are given to the office visitors;

Inclusion activities for the disadvantaged parties

- We provide 40-week training program for our employees' children, including coding, artificial intelligence, and mathematics training.
- With the cooperation of TEV, we have been providing mentoring support to female university students for 2 years.
- We support the education of our girls with the fund we have created at the Turkish Educational Foundation for 2 years.
- We have provided online STEM education over 120 students all over Turkey
- We donated computers to the students.
- We established innovation and technology classes in elementary schools.
- Netaş Orphans Foundation, has been supporting the education of the children of their deceased colleagues for 30 years.

Creating and supporting Ecosystem;

- We support young STEM teams on the international platforms, such as First Lego League, World Robotics Competition
- We supported start-ups by R&D and knowledge sharing

II. Labour

- Principle 3 - Businesses should uphold freedom of association & 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
- Principle 6 - Eliminate discrimination in respect of employment and occupation
- Child Labour
- Forced Labour
- Migrant Workers

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.

Suggested topics...

- Reference to ILO Core Conventions or other international instruments
- Written company policies to uphold the freedom of association and collective bargaining and the elimination of forced labour, child labour and employment discrimination
- Written policies that clearly state employee rights and responsibilities and their compensation and benefits
- Policy requiring business partners and suppliers to adhere to the Global Compact Labour principles
- Assessment of labour-related risks in the industry sector and country(ies) of operations
- Specific goals in the area of Labour Rights for the upcoming year

- In our recruitment processes, we have processes such as reference control, personal inventory and multi-stage interviews. Performance is tried to be created in line with SMART goals and goes through multiple calibrations and peer reviews in finalization.
- Our company strictly controls recruitment process and do not hire employees under 18, migrant workers or forced labour.
- The company is pursuing national minimum wage standard and and comply with minimum wages depending on employees qualificaitons and positions.
- BDH is harmonizing its standards to its Parent Company Netas on Environmental Health and Safety.

Implementation

Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.

Suggested topics...

- Suggestion box, call center or grievance mechanisms
- Awareness raising or training for employees on labour rights and policies
- Describe how the health and safety of all employees is ensured
- Describe how the company prevents discrimination of all kinds and ensures comparable pay for comparable work
- Consultation with employees and other stakeholders
- Allocation of responsibilities for the protection of labour rights within your organization
- Human resource policies and procedures supporting the Labour principles
- Participation in international framework agreements and other agreements with labour unions

- During the pandemic period to support the employees;
- For our employees' safe and healthy, we provided working flexibility
- In order to support the mental health of our employees; we held online activities on different topics

Measurement of outcomes

Description of how the company monitors and evaluates performance.

Suggested topics...

- Demographics of management and employees by diversity factors (e.g. gender, ethnicity, age, etc.)
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- Describe how the company deals with incidents of violations of the Global Compact Labour principles
- Investigations, legal cases, rulings, fines and other relevant events related to the Global Compact Labour principles
- Periodic review of results by senior management
- Specific progress made in the area of Labour during the last reporting period
- External audits (e.g. SA 8000)

We have not received any penalties, lawsuits etc. regarding the Global Compact Labour so far. We carry out our processes in accordance with standard business principles.

Employee demographic information is submitted to the senior management on a monthly basis and demographic data is reviewed by the management.

Apart from Netaş's certificates, no different audits were carried out for legal processes.

Demographics of management and employees by diversity factors;

Company Name							
	Male	Female	Total	Under 20	20-30(Include)	30-40(Include)	40-50(Include)
NETAS TELEKOMUNIKASYON A.S.	498	310	808	0	310	321	130
Netas Bilisim Teknolojileri A.S.	94	51	145	0	46	65	31
BDH Bilisim Destek Hizmetleri Sanayi ve Ticaret A.S.	911	296	1207	3	552	462	142

Environment

- Principle 7 - Businesses should support a precautionary approach to environmental challenges

- Principle 8 - Undertake initiatives to promote greater environmental responsibility
- Principle 9 - Encourage the development and diffusion of environmentally friendly technologies
- Climate Change
- Water Sustainability
- Energy
- Biodiversity
- Environmental Stewardship
- Green Industry

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.

Suggested topics...

- Assessment of the environmental footprint and impact of the company
- Written company policy on environmental issues, including prevention and management of environmental risks
- Policy requiring business partners and suppliers to adhere to the Global Compact environmental principles
- Describe specific goals in the area of environmental protection for the upcoming year

1. Our company has established an environmental & health and safety policy and has ISO 14001 (Environmental Management System)verified by TUV Nord.
2. Based environmental policy, a. Prevention of pollution b. Controlling the amount of the waste c. Conservation of sources d. Monitoring of energy consumption are targets by Facility& Technical Management and EHS department. Our targets has been set on this issues and monitored yearly . Besides, Emissions that are stemmed from our operations has been calculated and disclosing to Climate Change report on CDP.net.
3. All environmental activities are submitted on Environmental Health Safety report and published on our website each year
4. In our facilities or our operations occurring in the sites, The emergency procedures have been arranged and regular drills are conducting in order to be ready for every unexpected cases.
5. Although our environmental principles based on Global Compact do not adhere with business partners and suppliers, our specific goal for 2022 is to decrease energy consumption to 700 t.o.e. (tons oil equivalent) through substituting lightning bulbs, smart climatization application.

Implementation

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

Suggested topics...

- Awareness raising or training of employees on environmental protection
- Initiatives and programmes to reduce waste materials (e.g. recycling) and consumption of resources (energy, fossil fuels, water, electricity, paper, packaging, etc.)

- Activities aimed at improving the energy efficiency of products, services and processes
- Development and diffusion of environmentally friendly technologies
- Raise awareness among suppliers by asking for the environmental footprint of products or services
- Environmental management system to identify, monitor and control the company's environmental performance
- Allocation of responsibilities for environmental protection within the company

Measurement of outcomes

- Regularly each employees have been trained based ISO 14001(Environmental Management System),ISO 45001(Occupational health & safety Management System) and zero waste regulations
- Initiatives are conducted voluntarily based on the employees innate curiosity. Environmental goals for reducing waste materials (e.g. recycling) and consumption of resources (energy, fossil fuels, water, electricity, paper, packaging, etc.) are monitored yearly and updated and continuously improvement are followed up.
- Suppliers are audited yearly based on ISO 14001(Environmental Management System) and ISO 45001(Occupational health & safety Management System)
- Monthly ISO 14001(Environmental Management System) and 45001(Occupational health & safety Management System) goals are monitored.
- Each department has prime on ISO 14001(Environmental Management System) and ISO 45001(Occupational health & safety Management System) to spread the responsibilities within the company.

Description of how the company monitors and evaluates environmental performance.

Suggested topics...

- Information about how the company deals with incidents
- Investigations, legal cases, rulings, fines and other relevant events related to the Global Compact environmental principles
- Specific progress made in the area of the environmental protection during the last reporting period
- Periodic review of results by senior management
- External audits of environmental performance

- Even though there is a procedure to manage the incidents, any accidents has not occurred.
- Any legal cases was not held against the company during the last year
- Last year, the energy consumption rate fell 100 t.o.e (ton oil equivalent), the paper utilization diminished 4,5 tons.
- Periodic reviews based on ISO 14001 (Environmental Management System)and ISO 45001 (Occupational health & safety Management System) were held yearly by senior management
- The audits for certificate for ISO 14001(Environmental Management System) and 45001(Occupational health & safety Management System) were held once in three year, and surveillance audits were conducted yearly.

III. Anti-Corruption

Principle 10 - Businesses should work against all forms of corruption, 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.

Suggested topics...

- Assessment of risk of corruption and bribery in the company's industry and country(ies) of operation
- Written company policy of zero-tolerance for corruption, bribery and extortion
- Reference to (or statement of support for) the UN Convention Against Corruption and other international instruments
- Protocol to guide staff in situations where they are confronted with extortion or bribery
- Policy requiring business partners and suppliers to adhere to the Global Compact anti-corruption principles
- Specific goals in the area of anti-corruption for the upcoming year

- Anti-Bribery and Corruption Policy (“ABAC”) of Netaş contains the global practices especially on bribery and corruption like FCPA and UKBA, as well as local practices.
- In our ABAC Policy and ABAC trainings, it is clearly stated that we have zero tolerance for bribing any third party, including government officials, taking bribes from any party or providing facilitating payments. In addition, it has been clearly and unequivocally stated that any party acting on behalf of Netaş shall not engage in such actions on behalf of Netaş.
- Ethical and Compliance Principles and Rules Applicable to Supply Chain Management statement is in use when establishing relationships with business partner.
- Employees have been notified through many channels, including the Netaş ABAC Policy, regarding the notification channels/hotlines of Netaş and ZTE (the main shareholder of Netaş) where employees can raise their concerns or suspicions if they encounter bribery and corruption or any ethical problem.
- A comprehensive training on the prevention of bribery and corruption, which will refer to the UN Convention Against Corruption and other international instruments, is planned to be provided in 2022.

Implementation

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

Suggested topics...

- Suggestion box, call center or grievance mechanisms
- Awareness raising or training of employees about the company's policies regarding anti-corruption and extortion (e.g. mailings, internet, internal communication, etc.)
- Allocation of responsibilities for anti-corruption within the company
- Participation in industry initiative or other collective action on anti-corruption

- As Netaş Compliance Department, channels such as Transparency.org (Corruption Perception Index) and FCPA Blog are closely followed.
- We plan to include global news on bribery and corruption in the Compliance Newsletter, which is planned to be published monthly by the Netaş Compliance Department as of 2022, to increase the current awareness of the employees on compliance issues including ABAC.
- Netaş Compliance Department previously provided training to all employees on the prevention of bribery and corruption. The trainings, which are more comprehensive and includes more examples and information from global practices, will be provided to employees in 2022.

Measurement of outcomes

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

Suggested topics...

- Information about how the company deals with incidents of corruption
- Internal audits to ensure consistency with anti-corruption commitment, including periodic review by senior management
- Investigations, legal cases, rulings, fines and other relevant events related to corruption and bribery
- Specific progress made in the area of anti-corruption during the last reporting period
- External audits of anti-corruption programmes

- No employee has previously reported on bribery or corruption through ZTE's and Netaş's own compliance reporting channels. However, if any notification regarding this matter had been received, the matter would have been first evaluated by the Netaş Compliance Department. If the notification had reached Netaş through ZTE notification channels, the follow-up would also have been carried out by the ZTE Compliance Department.
- An Internal Audit Department was established at Netaş in November 2021. Audits within the scope of preventing Bribery and Corruption will be under the responsibility of the Internal Audit Department within 2022.
- Netaş has not previously been audited by any third party in the scope of bribery or corruption. Also, Netaş has not been involved in bribery and corruption cases before.