

	Kayakapi Tour. Yat. Tic. A.S. BUSINESS ETHICS RULES AND POLICIES	Publication Date: 29.11.2022
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CODE OF BUSINESS ETHICS

A. Integrity

Integrity and honesty are our primary values in all our business processes and relationships. We act with integrity and honesty in our relations with employees and all our stakeholders.

B. Privacy

Confidential and private information includes information that may create a competitive disadvantage for our Kayakapi Premium Caves Cappadocia Boutique Hotel (the Company), trade secrets, financial and other information that has not yet been disclosed to the public, information on personnel rights and information within the framework of "confidentiality agreements" concluded with third parties. As Kayakapi Premium Caves Cappadocia Boutique Hotel employees; we pay attention to the confidentiality and protection of private information of our customers, employees and other relevant persons and organizations we work with. We protect confidential information regarding the activities of the Company, use this information only for the purposes of the Company, and share this information with the relevant persons only within the specified authorizations.

For us, it is absolutely unacceptable to obtain any commercial benefit, including the purchase and sale of shares on stock exchanges (insider trading), by leaking any confidential information belonging to the Company. When we leave our company, we do not take out confidential information and documents and projects, regulations, etc. that we have due to our duties.

C. Protection of Personal Data

The employee shall not share, transfer, disclose, misuse or misuse the special and general personal data belonging to the employer or employer representatives, employees, sub-employer employees, customers, suppliers, third parties, guests, job applicants, interns and all real persons related to the company's activities in electronic media in written, audio or video form without the written consent of the data owner and the employer,

D. Conflict of Interest

As Kayakapi Premium Caves Cappadocia Boutique Hotel employees, we aim to avoid conflicts of interest. By taking advantage of our current position; we do not gain personal benefit from persons and organizations with whom we have business

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relations personally, through our family or relatives. We do not engage in business activities based on an additional financial interest outside the company. We refrain from using the name and power of Kayakapi Premium Caves Cappadocia Boutique Hotel and the corporate identity of Kayakapi Premium Caves Cappadocia Boutique Hotel for personal benefit.

In the event of a potential conflict of interest, when we believe that the interests of the parties involved can be safely protected through legal and ethical means, we apply these means. When in doubt, we consult with our manager, Human Resources or the Company Ethics Committee Advisor.

Kayakapi Premium Caves Cappadocia Boutique Hotel BUSINESS ETHICS RULES and POLICIES

E. Our Responsibilities

In addition to our legal responsibilities; we take care to fulfill our responsibilities listed below towards our customers, employees, shareholders, suppliers and business partners, competitors, society, humanity and Kayakapi Premium Caves Cappadocia Boutique Hotel.

1. Our Legal Responsibilities

We conduct all our activities and transactions in Turkey and abroad within the framework of the laws of the Republic of Turkey and international law, and provide accurate, complete and comprehensible information to legal regulatory institutions and organizations in a timely manner.

While carrying out all our activities and transactions, we keep an equal distance from all kinds of public institutions and organizations, administrative entities, non-governmental organizations and political parties without any expectation of benefit and fulfill our obligations with this sense of responsibility.

2. Our Responsibilities to Our Customers

We work with a proactive approach that focuses on customer satisfaction and responds to the needs and demands of our customers in the shortest time and in the most accurate way. We provide our services on time and under the promised conditions; we approach our customers with respect, honor, justice, equality and courtesy.

3. Our Responsibilities to Employees

We ensure that employees' personal rights are fully and properly utilized. We approach employees honestly and fairly, and commit to a non-discriminatory, safe

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and healthy working environment. We make the necessary efforts for the individual development of our employees, support them in volunteering for appropriate social and community activities in which they will take part with a sense of social responsibility, and observe the balance between business life and private life.

4. Our Responsibilities Towards Our Suppliers/Business Partners

We act fairly and respectfully, as expected from a good customer, and take due care to fulfill our obligations on time. We carefully protect the confidential information of the persons and organizations we do business with and our business partners.

5. Our Responsibilities Towards Our Competitors

We compete effectively only in legal and ethical areas and avoid unfair competition. We support efforts to ensure the targeted competitive structure within the society.

6. Our Responsibilities to Society and Humanity

The protection of democracy, human rights, and the environment; education and charity; and the elimination of crime and corruption are very important to us. With the awareness of being a good citizen, we act sensitively as a pioneer in social issues; we try to take part in non-governmental organizations, public interest services and appropriate activities. We act sensitively to the traditions and cultures of Turkey and the countries where we carry out international projects. We do not give or accept bribes or gifts in excess of the intended value, etc. products and services.

7. Our Responsibilities towards the Name of Kayakapi Premium Caves Cappadocia Boutique Hotel

Our business partners, customers and other stakeholders trust us for our professional competence and integrity. We strive to maintain this reputation at the highest level.

We provide our services within the framework of Company policies, professional standards, commitments and ethical rules, and we show the necessary dedication to fulfill our obligations.

We take care to provide services in areas where we believe we are and will be professionally competent, and we aim to work with customers, business partners and employees who meet the criteria of integrity and legitimacy. We do not work with those who undermine public morality and harm the environment and public health.

We express only our Company's views, not our own, in public and in areas where the audience may assume that we are speaking on behalf of our Company.

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When faced with complex situations that may put the Company at risk, we first consult with appropriate personnel, following appropriate technical and administrative consultation procedures.

POLICIES SUPPORTING THE CODE OF BUSINESS ETHICS

A. Conflict of Interest Policy

It is essential that Company employees avoid situations that may create conflicts of interest. It is one of the most important responsibilities of all employees not to use the Company's resources, name, identity and power for personal benefit, and to avoid situations that may negatively affect the name and image of the organization. The following code of practice sets out the conflict of interest situations that Company employees may encounter in the performance of their duties or in their private lives due to their business relationships and the principles to be applied in these situations.

Code of Practice

1. Activities that may create a conflict of interest

The Company employees are required to fully comply with the situations listed below as activities that may create conflicts of interest and the stated principles. The Company carries out the necessary work to encourage its employees to comply with these principles.

i. Engaging in Activities that may Create Conflict of Interest

Within the scope of their duties, employees shall not enter into any business relationship with family members, friends or other third parties with whom they have a relationship that provides mutual or gratuitous benefits under any circumstances. For example, an employee with purchasing authority should avoid doing business with a supplier where a family member works. Exceptional cases are subject to the knowledge and approval of the Company's Board of Directors. In the same vein, employees of the Company should also be cautious of conflicts of interest that may arise from close family members working for the Company's competitors.

Employees may not obtain any commercial benefit, including the purchase and sale of shares on the stock exchange, by leaking any information belonging to the Company, nor may they be instrumental in enabling others to obtain such benefit.

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It is essential that the employees of the Company do not directly or indirectly engage in activities that require them to be considered as "merchants" or "tradesmen", and that they do not work for another person and/or organization for a fee or similar benefit, under any name whatsoever, during or outside working hours. However, employees may not work for another person (family member, friend, other third parties) and/or the organization for a salary or similar benefit outside of working hours;

- Not to create a conflict of interest with the position they hold in the Company,
- It does not create incompatibility with other business ethics rules and policies that support these rules,
- It does not adversely affect the continuation of their duties in the Company,
- It is possible with the written approval of the management.

Approval is given by the Company's Board of Directors for Assistant General Managers, and for other employees by the Company's Ethics Committee Advisor, the Company's Assistant General Managers with the opinion of HR.

Employees may not serve as a board member or auditor in other companies without the approval of the Company's Board of Directors, and may not work in competitors or companies with which the Company has business relations. Employees may work in non-profit organizations and universities for social responsibility and charity purposes with the written approval of the Management, provided that it does not interfere with their duties within the Company.

Managers who are in a position to make hiring decisions may not hire their spouses, close relatives and relatives of these persons.

Employees may make speeches and write professional articles on topics that are not related to the Company and its activities and that do not contradict its policies. In order to use the Company name in these activities, approval must be obtained from the Assistant General Managers.

Employees may, individually and voluntarily, be active in any political party. Managers cannot ask their employees to do political work or become a member of a political party. It is possible for employees to take part in any political party under the following conditions and with the written approval of the management;

- Employees' involvement in any political activity should not create a conflict of interest with their duties in the company.

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- Employees may not engage in any political activity during working hours and may not take up their colleagues' time for such activities.
- Employees may not use the company name, position, title and resources belonging to the company during their political activities.

Approval for employees who wish to take part in political activities is given by the Company's Board of Directors for Assistant General Managers, and for other employees by the Company's Ethics Committee Advisor, the Company's Assistant General Managers with the opinion of HR.

Employees may personally provide material or moral aid and/or donations to third parties outside the Company, and may take part in charity associations.

ii. Abuse of Office

It is unacceptable for employees to harm the Company by using their powers for their own and/or their relatives' benefit and without the due diligence expected from them.

Employees may not directly or indirectly derive personal gain from the Company's purchasing and sales activities and all transactions and contracts to which the Company is a party.

Employees may not engage in acts and behaviors contrary to morality, the law and Company discipline.

iii. Use of Resources

Company interests are taken into account in the use of resources on behalf of the Company. Company assets, facilities and employees may not be used outside the Company, under any name, on behalf of and for the benefit of anyone, without the Company's interest. The principle of "economy in all matters" is applied by all employees.

The proper use of resources for the benefit of the Company also requires the proper use of time. During business hours, employees use their time well and do not spare time for their personal affairs during business hours. Managers may not assign employees for personal business.

It is essential not to accept private visitors during working hours. Employees are required to complete the meetings for mandatory visitors in a reasonable time in connection with the subject of the visit and in a way that does not interfere with the workflow.

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iv. Relations with Other Persons and/or Organizations with whom the Company has Commercial Relations

No private business relationship may be entered into with the Company's customers, subcontractors or suppliers and other persons and/or organizations with whom the Company has commercial relations, no money and/or goods/services may be borrowed for personal purposes, and no money and/or goods/services may be lent to other persons and/or organizations with whom the Company has commercial relations.

The following issues are taken into account in relations with customers; no transaction may be made without the customer's knowledge, even if it is in favor of the customer, and even if it is in favor of the company, customer weaknesses may not be exploited and profit may not be sought by providing incomplete or incorrect information to the customer.

Employees may not request or insinuate gifts from other persons and/or organizations with which the Company has commercial relations; they may not accept any gifts, money, checks, properties, free vacations, special discounts, etc. that may put the Company under obligation. Personal aid and donations cannot be accepted from any person or organization that has a business relationship with the Company. The Gift Acceptance and Giving Policy shall apply in this regard.

v. Relations with Media

In relations with the media, the Company acts in accordance with the Company Communication Policy. Giving a statement to any broadcasting organization, conducting interviews, attending seminars, conferences, etc. as a speaker depends on the approval of the Assistant General Managers. No personal gain can be obtained from these activities in any way.

vi. Representing the Company

In all kinds of associations, employers' unions and similar non-governmental organizations representing the Company, all kinds of fees to be accrued due to the duties performed shall be donated to the relevant institution or to the channels to be indicated by the relevant institution.

Payments made by 3rd parties to Company employees in return for seminar speaker fees or similar services are similarly donated to the relevant institution or to the channels to be directed by the institution. In addition to money, these persons may receive gifts such as prizes, awards, etc. that are given to commemorate the day and have symbolic value.

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B. Gift Acceptance and Giving Policy

It is essential that employees do not accept gifts or benefits that may affect their impartiality, decisions and behaviors, and do not attempt to provide gifts and benefits to third parties and organizations that may create such effects. The application principles defined below regulate the gift exchanges that employees may have with third parties and organizations with whom they have business relations and determine the principles to be applied in this regard.

Code of Practice

1. Employees are prohibited from receiving all kinds of benefits and gifts, with or without economic value, that affect or are likely to affect their impartiality, performance and decision-making while performing their duties.

2. Employees;

- Aligned with the organization's business objectives,
- In accordance with applicable legislation and
- They may receive and/or give the gifts outlined in Article 3 or accept to be subjected to a special treatment, provided that the public disclosure of the gift will not put the Company in a difficult situation.

3. Provided that it complies with the conditions set out in Article 2;

- Employees may provide and receive entertainment, refreshments and meals at standards acceptable in the business world, provided that they comply with the principles in the relevant documents of the Company regulating authorizations.
- In seminars and similar organizations attended on behalf of the Company, gifts such as prizes, awards, mattresses, etc. may be received in addition to cash as a memento of the day and with symbolic value.

4. **Other** gifts, benefits, vacations, discounts, etc. other than the aforementioned situations and money. Provided that the conditions listed in Article 2 are met, no approval is required if the total value of the gifts received, separately for each calendar year and the person/institution giving the gift, is less than 250 TL.

5. It is prohibited to receive gifts or benefits that are implicitly or explicitly linked to a quid pro quo.

6. Taking, giving or offering bribes and/or kickbacks is not acceptable under any circumstances.

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7. Employees are prohibited from accepting money from subcontractors, suppliers, consultants, consultants, competitors or customers in the form of gratuitous or loan payments, reimbursement of travel expenses, event expenses and similar payments.

8. The gifts and promotional materials to be given by the Company to customers, dealers and other third parties with whom the Company has business relations are determined with the approval of the Assistant General Managers. There is no need to obtain permission for the distribution of approved gifts and promotional materials.

9. Subject to compliance with the conditions set forth in Article 2, the Company may accept appropriate products and services as gifts and, with the knowledge and approval of the Deputy General Managing Directors, products or services that are appropriate to the culture and ethical values of the recipient may be given as gifts.

10. In exceptional cases where local cultural values require the exchange of gifts in excess of the values set forth in Company policy, such gifts may only be accepted on behalf of the Company and with the approval of the Executive Vice Presidents. In any case, the exchange of gifts must be done in accordance with local culture.

C. Confidential Information Protection Policy

Information is one of the most important assets that the Company will use to realize its vision. Accordingly, it is the common responsibility of all our companies and employees to use information effectively, to share it correctly and to ensure the confidentiality, integrity and accessibility of information in this process. It is important that the management systems and processes established for the management and confidentiality of information in our company are in harmony with each other in order for the Company to obtain the highest level of benefit. Details of the relevant practices are included in Kayakapi Premium Caves Cappadocia Boutique Hotel Information Security Policy and related documents. The following code of practice defines confidential information for the Company and regulates the principles that employees must comply with regarding confidential information.

Code of Practice

Confidential Information includes, but is not limited to, the Company's trademarks, etc. intellectual rights, including, but not limited to, trademarks, etc. belonging to the Company, all kinds of innovations, databases, printed communication materials, processes, advertising, product packaging and labels and plans (marketing, product, technical), business strategies, strategic partnerships and information on partners, financial information, personnel information, customer lists, product designs, know-how, specifications, identity of potential and actual customers, information on suppliers, etc. It includes all kinds of written, graphic or machine-readable information.

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The principles to be followed regarding confidential information are set out below:

1. This information cannot be disclosed to third parties unless disclosure is mandatory in accordance with the Official Authorities and Legislation.
2. This information cannot be changed, copied or destroyed. Necessary precautions are taken to ensure that the information is kept carefully, stored and not disclosed. Changes to the information are recorded together with its history.
3. Confidential files cannot be taken out of the organization. For confidential information that needs to be taken out of the organization, the approval of the person responsible for the information or senior management must be obtained.
4. Passwords, user codes and similar identifying information used to access company information are kept confidential and not disclosed to anyone other than authorized users.
5. Company confidential information shall not be discussed in dining halls, cafeterias, elevators, service cars and similar public places.
6. Confidential information is classified according to the degree of confidentiality and this is clearly stated in the content of the information. Employees know the degree of confidentiality of the information they obtain as part of their duties and act in accordance with this confidentiality. In case of any hesitation in terms of the degree of confidentiality, they act according to the next higher confidentiality class and the opinion of the relevant manager is taken when necessary.
7. In the event that information is shared with third parties and/or organizations for the benefit of the Company, a confidentiality agreement is signed for information sharing or a written confidentiality commitment is obtained from the other party in order to ensure that these persons and organizations understand their responsibilities regarding the security and protection of the shared information.
8. No unfounded statements and/or rumors about individuals or institutions.
9. Wages, fringe benefits and similar personal information of the personnel, which reflect the Company policy and are personalized, are confidential and cannot be disclosed to anyone other than authorized persons. Employee information is sent in a personalized manner. It is strictly forbidden for employees to disclose this information to others or to pressure other employees to disclose the information.

D. Policy on Creating and Maintaining a Fair Working Environment

The Company considers the creation and maintenance of a fair working environment for employees as one of its top priorities. It is aimed to increase the success, development and loyalty of employees by creating a fair, respectful, healthy and safe working environment in compliance with all relevant laws and regulations. The following code of practice sets out the basic principles for creating and maintaining a fair working environment at the Company.

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Code of Practice

1. Company practices comply with all applicable laws and regulations regarding employment and working life. Company employees also fulfill all legal requirements within the scope of their activities and act in accordance with legal regulations.

2. Kayakapi Premium Caves Cappadocia Boutique Hotel human resources policies and practices; recruitment, promotion-transfer-rotation, remuneration, rewarding, social rights, etc. ensures that all other practices are fair.

3. It is unacceptable to discriminate among employees within the organization based on language, race, color, gender, political opinion, belief, religion, sect, age, physical disability and similar reasons.

4. The Company creates a positive and harmonious working environment that supports cooperation and prevents conflict and ensures that people with different beliefs, thoughts and opinions work in harmony.

5. Employees' private life and personal space are respected.

- Communications between individuals cannot be violated by non-parties.
- Even if it is recorded in accordance with the law, unlawful disclosure/dissemination/possession of personal data to others is prohibited.
- Personnel personal information arising from the nature of the business relationship in the workplaces and which may be necessary for the continuation of the business relationship is not used for purposes other than its intended purpose and is not shared with third parties without the consent of the individuals.
- All employees' private and family life is respected.

6. In addition to all kinds of inviolability of employees, their physical, sexual and emotional inviolability is also respected.

- Violation of the immunity of employees in any way through physical, sexual and/or emotional harassment at the workplace or anywhere they are present due to work is against the law and ethical rules and this crime is not tolerated by the Company in any way. The purpose of this practice is to ensure that employees work in a work environment where their physical, sexual and emotional immunity is protected.
- Sexual harassment is defined as the violation of a person's bodily inviolability through sexual behavior and/or harassment of a person for sexual

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purposes without physical contact. Accordingly, any behavior that can be considered within this definition is prohibited.

- In addition, there is no tolerance for those who behave in a negative manner towards those who make complaints and reports about any harassment or assist in the investigation.

7. No employee may demand preferential treatment, show privilege to anyone or be subjected to special treatment due to different gender, religion, language, race. It is unacceptable to take or give concessions by taking advantage of differences such as gender, religion, language, race.

8. It is ensured that the physical working environment and conditions of the workplace are healthy and safe for all employees.

F. Anti-Bribery and Anti-Corruption Policy

For Kayakapi Premium Caves Cappadocia Boutique Hotel;

Corruption is the misuse of the authority of a position of power, directly or indirectly, for the purpose of gaining profit of any kind.

Bribery is when a person, directly or through intermediaries, provides benefits to himself/herself or to the party requesting it or to another person as a result of this relationship within the framework of an agreement with another person to act contrary to the requirements of his/her duty by providing, offering or promising benefits, demanding or accepting them, or mediating them in order to do, have done, not do, speed up or slow down a work related to the performance of his/her duty. Bribery and corruption can be carried out in many different ways. These are

- Cash payments,
- Political or other donations,
- Commission,
- Social rights,
- Gift, hospitality,
- Other benefits.

Facilitation payments are unofficial, improper, small payments made to a lower level official to secure or expedite the performance of a routine or necessary action to which the party making the facilitation payment is legally entitled. Such improper payments are monitored through notifications to Kayakapi Premium Caves Cappadocia Boutique Hotel.

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Persons and entities covered by this Policy are not offered facilitation payments to secure or expedite a routine transaction or process (obtaining permits and licenses, obtaining documents, etc.) with government agencies.

Within the framework of transparency and accountability, we take all necessary measures to prevent all forms of bribery, corruption and facilitation payments.

In the event that any Kayakapi Premium Caves Cappadocia Boutique Hotel employee or stakeholder witnesses any act or practice related to bribery and corruption, reports this situation to the HR department or the relevant situation is detected ex officio by the authorized units;

A. The Disciplinary Board convenes for the employees of Kayakapi Premium Caves Cappadocia Boutique Hotel and if it is determined that the employee has attempted or committed an act related to bribery and corruption, the necessary sanction is applied immediately after the written defense is received or after the time allowed for the written defense has passed, taking into account the principle of proportionality. Sanctions such as warning, reprimand, wage deduction may be applied, or the employment contract may be terminated in accordance with the principle of last resort.


B. In the event that any attempt or act of Kayakapi Premium Caves Cappadocia Boutique Hotel's stakeholders, customers, suppliers and/or any party with whom Kayakapi Premium Caves Cappadocia Boutique Hotel has any commercial and sectoral ties is detected that may be related to bribery and/or corruption, the necessary notifications will be made immediately by applying to the legal authorities.

III. APPLICABLE LEGISLATION

Since the Company operates in international markets, the Company's operations may be subject to the laws and regulations of different countries. When there are questions about the ethics of doing business in different countries, the regulations in the country where the business is carried out should be followed first. If following the regulations in the country and/or countries where the work will be carried out is of a nature that may create unfavorable results in terms of the ethical values adopted by the Company, then we should try to find solutions within the ethical rules and procedures we have.

IV. RESPONSIBILITIES OF EMPLOYEES

Kayakapi Premium Caves Cappadocia Boutique Hotel - Ethics and related policies and procedures set out in detail the ethical rules on how we should behave and conduct our business. Compliance with these rules is the primary responsibility of all employees. Accordingly, Company employees are required to

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- Acting in accordance with laws and regulations under all circumstances,
- To read Kayakapi Premium Caves Cappadocia Boutique Hotel Code of Ethics, to know, understand, internalize and act in accordance with the rules, principles and values contained therein,
- Learn the general policies and procedures applicable to the company and specific policies and procedures related to their work,
- Consult with their manager and human resources about potential violations involving themselves or others,
- Immediately report possible violations by oneself or others, and communicate these issues to one's manager, HR in writing or verbally, with or without a name,
- "Monitoring the Ways and Methods to be Followed While Making Ethical Decisions", which is defined to help in acting in line with the rules and solving problems,
- The Company has the responsibility to cooperate with the Company Ethics Committee Advisor in ethical investigations and to keep the information related to the investigation confidential.

A. Ways and Methods to be Followed While Making Ethical Decisions


You should follow these steps and ask yourself these questions to guide you in deciding on a course of action:

1. Identifying the Event, Decision or Problem

- Were you asked to do something you thought might be wrong?
- Are you aware of something potentially illegal or unethical in your company or business partners?
- Are you trying to make a decision and have doubts about how to behave in accordance with business ethics?

2. Think Before Deciding

- Try to clearly identify and summarize the problem or question
 - Ask yourself why there is a dilemma
 - Consider the options and their consequences
 - Think about who might be affected
 - Consult others
- ##### **3. Decide on a Plan of Action**

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- Identify your responsibilities
- Review all relevant facts and information
- Refer to appropriate company policies, procedures and professional standards
- Assess the risks and think about how to mitigate them
- Try to create the best plan of action
- Consult others

4. Test Your Decision

- Review the ethical questions to ask
- Review your decisions within the framework of the company's core values
- Make sure you take into account company policies, laws and professional standards.
- Consult others and incorporate their views into your planned course of action.

5. Continue with Determination

- Share your decision with the relevant people with your reasons
- Share what you have learned
- Share your success story with others

B. 4 Key Questions to Consider

1. Does this activity/behavior comply with laws, rules and customs? (Standards)
 - Does it meet professional standards?
 - Is it in accordance with the law?
2. Is this activity/behavior balanced and fair? Would we feel uncomfortable if a competitor (someone else) did it? (Sense of fairness)
 - Is that true for you?
3. Would our company and stakeholders be uncomfortable if all the details of this event were made public? (Emotions and ethical values)

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- Would you be in a difficult situation or embarrassed if others knew that you had engaged in this behavior?
 - Could it have negative consequences for you or your Company?
 - Who else might be affected (other employees within the company, you, shareholders, etc.)?
4. To what extent does the "perceived reality" correspond to the "objective reality"?
- How would it be reflected in newspapers and social media?
 - What would a reasonable person think in the same circumstances?

V. RESPONSIBILITIES OF MANAGERS

Company managers have additional responsibilities beyond the responsibilities defined for employees within the Ethical framework of Kayakapi Premium Caves Cappadocia Boutique Hotel. Accordingly, managers;

- Ensuring the creation and maintenance of a corporate culture and working environment that supports ethical rules,
- Setting an example for the implementation of ethical rules with their behaviors and training their employees on ethical rules,
- Supporting employees in communicating their questions, complaints and notifications regarding ethical rules,
- Providing guidance on what to do when consulted, taking into account all notifications received and forwarding them to the Ethics Committee Advisor as soon as possible when deemed necessary,
- Ensuring that the business processes under his/her responsibility are structured in a way to minimize the risks related to ethical issues and applying the necessary methods and approaches to ensure compliance with ethical rules.

VII. OTHER RESPONSIBILITIES

- The Company's Senior Management is responsible for the effective implementation of the Code of Ethics of Kayakapi Premium Caves Cappadocia Boutique Hotel and the creation of a culture that supports it.
- Kayakapi Premium Caves Cappadocia Boutique Hotel Code of Ethics and all related policies are reviewed, revised and documented by HR and announced to the Companies with the approval of the Assistant General Managers.

- HR;

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- Informing employees about the code of ethics, providing trainings in certain periods in order to ensure the comprehensibility of policies and rules, and ensuring continuous communication of this issue with employees,
 - Ensuring that those who are employed by the Company read the Code of Ethics, are informed about it and sign the Employee Declaration,
 - At the beginning of each year, it is responsible for ensuring that all white-collar employees renew their notifications by printing out and signing the Business Ethics Compliance Form available electronically.
- Company Managements in cooperation with the Ethics Committee Advisor;
 - Guaranteeing the confidentiality of complaints and notifications made within the framework of ethical rules and protecting individuals after their notifications,
 - Ensuring the occupational safety of the notifying employees,
 - Ensuring that complaints and notifications are investigated in a timely, fair, consistent and responsive manner and taking the necessary actions as a result of violations with determination

are responsible.

VIII. RESOLUTION OF NON-COMPLIANCE WITH ETHICAL RULES

Those who violate the Code of Business Ethics or Company policies and procedures will be subject to disciplinary sanctions, up to and including termination of employment, if necessary. Disciplinary sanctions will also be imposed on those who approve, direct or have knowledge of improper conduct or violations of the Code and fail to report them appropriately.

A. Ethics Committee

In the event of an ethical violation that requires an investigation, the Company Ethics Committee Advisor convenes the Ethics Committee of 3 members consisting of himself/herself, the HRIE Manager and the Audit Manager. The Ethics Committee Advisor chairs the Committee. The Board convenes with the Chairman and at least one of the members. The Board takes its decisions unanimously.

In the event that a member of the Ethics Committee is involved in an ethics investigation, the member in question cannot attend the meetings related to this investigation.

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The Ethics Committee reports to the Board of Directors. However, when deemed necessary, it reports to the Board of Directors of Kayakapi Premium Caves Cappadocia Boutique Hotel.

The Ethics Committee is responsible for investigating and resolving complaints and notifications of violations of the code of ethics within the scope of Kayakapi Premium Caves Cappadocia Boutique Hotel-Ethics.

B. Ethics Committee Working Principles

The Ethics Committee conducts its activities within the framework of the principles set out below:

- Keeps the identity of notifications and complaints and the identity of those making the notification or complaint confidential.
- Conduct the investigation in as confidential a manner as possible.
- It is authorized to request information, documents and evidence related to the investigation directly from the existing unit. It may examine all kinds of information and documents it obtains only limited to the subject of the investigation.
- The investigation process is recorded in a written report from the beginning. Information, evidence and documents are attached to the report.
- The minutes are signed by the chairman and the members.
- The investigation is handled in an expeditious manner and will be concluded as quickly as possible.
- The decisions taken by the Board shall be implemented immediately.
- Relevant departments and authorities are informed about the outcome.
- The Chairman and members of the Board act independently and without being influenced by the department managers and the hierarchy within the organization while performing their duties on this matter. They may not be pressured or advised on the matter.
- The Board may seek expert opinion if it deems necessary and may make use of experts during the investigation by taking measures not to violate the principles of confidentiality.

For your questions and notifications, you can use the e-mail and postal addresses below or contact the Ethics Committee Advisor directly.

Kayakapi Premium Caves Cappadocia Boutique Hotel Ethics Committee

Name Surname Yakup DİNLER

E-mail contact@kayakapi.com

Phone 0384 341 88 777

 KAYAKAPI PREMIUM CAVES CAPPADOCIA	Kayakapi Tour. Yat. Tic. A.S. BUSINESS ETHICS RULES AND POLICIES	Publication Date: 29.11.2022
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Mailing Address Kayakapi Premium Caves Cappadocia Our boutique hotel Kayakapi Mah.
Kuşçular Sok. No:43 Urgup Nevsehir

(Working hours: 08:00-12:30 and 13:30-16:00 on weekdays) (16:00-24:00 , 24:00-08:00)

The Board of Directors is committed to fulfilling the requirements set out in this policy and expects the employees of Kayakapi Premium Caves Cappadocia Boutique Hotel to fulfill the same commitments.