

MLP Care Ethics Principles Policy

At MLP Care, we are committed to acting transparently, honestly, and responsibly in all our activities in accordance with our ethics principles policy. Adopting and maintaining high ethical standards in our relationships with employees, patients, business partners, and all our stakeholders forms the foundation of our corporate identity. By continuously improving our ethical values, we prioritize a fair and reliable approach in our business processes and aim for full compliance with legal regulations.

1. Corporate Ethics Principles

Honesty

Accuracy and honesty are our primary values in all our business processes and relationships. We act with honesty and integrity in our relations with employees and all our stakeholders. The principle of honesty is upheld by all our employees in the information provided to our patients and stakeholders during service delivery. In line with the "Confidentiality" principle, we disclose the criteria related to our institution's clinical and corporate performance, approved for publication, on our website for the information of our patients and stakeholders.

Confidentiality

Confidential and private information includes information that could create competitive disadvantages for the institution, trade secrets, financial and other information that has not yet been disclosed to the public, personal rights information of staff, and information covered by "confidentiality agreements" made with third parties. As institution employees, we respect the privacy of our customers, employees, and other relevant individuals and organizations we work with and protect the rights of patients in accordance with the "**Patient Rights and Responsibilities Procedure.**" To raise awareness of Patient Information Confidentiality, a "**Patient Information Confidentiality Visual**" is displayed throughout the hospital. We protect confidential information related to the activities of Group Companies, use this information solely for institutional purposes, and share it only with authorized individuals.

Conflict of Interest

As institution employees, we aim to avoid conflicts of interest. We do not seek personal gain from individuals and organizations with whom we have business relationships through our current duties or through our family or close contacts. In potential conflict of interest situations, we apply methods that ensure the protection of the interests of the involved parties through legal and ethical means when we believe this can be accomplished. In cases of doubt, we consult with our manager, the Human Resources Department, or our Disciplinary Board and ensure that the matter is reported to the Internal Audit Unit.

Our Responsibilities

In addition to our legal responsibilities, we strive to fulfill the following responsibilities to our customers, employees, shareholders, suppliers, business partners, competitors, society, humanity, and the institution.

Legal Responsibilities

We conduct all our activities and transactions within the country and abroad in accordance with the laws of the Republic of Turkey and international law, providing timely, accurate, and comprehensible information to regulatory bodies. While conducting our activities and transactions, we maintain an equal distance from all public institutions and organizations, administrative formations, non-governmental organizations, and political parties without expecting any benefits, fulfilling our obligations with this sense of responsibility.

Our Responsibilities to Customers

We work with a proactive understanding that responds promptly and accurately to our customers' needs and requests from their application to their discharge, including hospitalization, internal and external transfers, and discharge. We provide our services in a timely manner and under the promised conditions, approaching our customers with respect, dignity, fairness, equality, and politeness. We act in accordance with the "**Pricing Directorate Operational Procedure**", considering national pricing policies to ensure that the services provided are billed standardly and accurately.

Our Responsibilities to Employees

We ensure that employees' personal rights are used fully and accurately. We approach employees honestly and fairly, committing to a non-discriminatory, safe, and healthy working environment. We make necessary efforts for the individual development of our employees and support their voluntary participation in appropriate social and community activities, while ensuring a balance between work and private life.

Our Responsibilities to Partners

Prioritizing the continuity of the institution and aiming to create value for our partners, we avoid taking unnecessary or unmanageable risks, aiming for sustainable profitability. We act within the framework of financial discipline and accountability, managing our company's resources and assets with efficiency and thrift. We strive to enhance our competitiveness and invest in areas that provide the highest return on investment. In our public statements and to our shareholders, we provide timely, accurate, complete, and comprehensible information regarding our financial statements, strategies, investments, and risk profile.

Our Responsibilities to Suppliers/Business Partners

We behave fairly and respectfully, as expected of a good customer, and exercise due diligence to fulfill our obligations on time. We carefully protect the confidential information of the individuals and organizations with whom we do business.

Our Responsibilities to Competitors

We compete effectively only in legal and ethical areas and avoid unfair competition. We conduct our marketing activities in accordance with laws and our ethical principles as outlined in the "Corporate Marketing Operational Procedure." We support efforts to achieve the desired competitive structure in society.

Our Responsibilities to Society and Humanity

The protection of democracy, human rights, and the environment; education and charitable activities; and the eradication of crime and corruption are very important to us. Acting sensitively and proactively in social issues, we strive to take part in civil society organizations, public interest services, and appropriate activities in these matters. We do not give or accept bribes or gifts with excessive value.

Our Responsibilities in the Name of the Brand

Our business partners, customers, and other stakeholders trust us due to our professional competence and integrity. We strive to maintain this reputation at the highest level. We provide our services in accordance with professional standards, our commitments, and ethical rules, showing the necessary dedication to fulfill our obligations. We aim to serve in areas where we believe we are and will be professionally competent, working with customers, business partners, and personnel who meet the criteria of accuracy and legitimacy. We do not work with those who undermine community ethics or harm the environment and public health.

2. Policies Supporting Business Ethics Rules

Conflict of Interest Policy

It is essential for institution employees to avoid situations that may create conflicts of interest. The use of institutional resources, name, identity, and power for personal benefit and avoiding situations that may negatively affect the institution's name and image is one of the most important responsibilities of all employees.

Misuse of Position

It is unacceptable for employees to harm the institution by using their authority for personal and/or close relatives' benefit beyond the care expected from them. Employees cannot engage in acts and behaviors contrary to morality, law, and institutional discipline.

Use of Resources

When using resources on behalf of the institution, institutional interests are taken into account. Employees must diligently use the machinery, equipment, and tools they use in their duties, solve any arising problems according to the rules set by the institution, and must not use institutional machinery, equipment, and tools for personal purposes. The principle of "Thrift in Everything" must be implemented by all personnel. The correct use of resources in the institution's interest also requires proper use of time. During working hours, Center/Hospital employees must use their time well and not allocate time for personal matters during work hours. Managers cannot assign employees for personal tasks. It is essential that no private visitors are accepted during working hours. Employees must complete meetings with necessary visitors within a reasonable time related to the purpose of the visit, without disrupting workflow.

Relations with Other Persons and/or Organizations in Commercial Relationships with the Institution

The institution does not enter into private business relationships with its customers, contractors, suppliers, or other individuals and/or organizations with which the Holding/Company has commercial relationships.

Representation

It is essential for Center and Hospital personnel to act in harmony with a sense of honesty and honor towards each other and third parties. Personnel should strive to be sensitive to their surroundings, present themselves in an appropriate and well-groomed manner at the workplace, and behave in a manner consistent with the institution's reputation in their private lives.

Gift Acceptance and Giving Policy

Employees should not request gifts directly or through intermediaries from the workplaces with which they have business relationships and should not accept gifts from individuals or legal entities for the purpose of obtaining benefits, even if not during their duties (excluding promotional items sent to introduce themselves, such as notebooks, calendars, pens, etc.). Employees should not ask for or accept loans from patients and/or their relatives or business owners.

Respect for Employees' Private Lives and Personal Spaces Communications

Between individuals cannot be violated by parties not involved. Even if recorded legally, the unlawful disclosure/dissemination of personal data to others is prohibited. Personnel information that may be necessary due to the nature of the business relationship in workplaces is not used for purposes other than those and is not shared with third parties without the consent of the individuals. All employees' private and family lives are respected. Any violation of the physical, sexual, and/or emotional integrity of employees through harassment of any kind is against the law and ethical rules, and such situations will not be tolerated by the institution in any way. The aim of this practice is to ensure that employees work in an environment where their physical, sexual, and emotional integrity is protected. The violation of someone's bodily integrity through sexual behavior and/or sexual harassment without physical contact is defined as sexual harassment. Accordingly, any behavior that can be evaluated within this definition is prohibited. Furthermore, those who exhibit negative behavior towards individuals who report any harassment or assist during the investigation will also not be tolerated.

No employee can request preferential treatment due to different gender, religion, language, or race, nor can anyone show favoritism or be subjected to special treatment. Accepting or giving concessions based on differences such as gender, religion, language, or race is unacceptable. The workplace physical working environment and conditions are ensured to be healthy and safe for all employees.

3. Responsibilities of Employees

Corporate policies and procedures detail the ethical rules regarding how we should behave and conduct our work. Compliance with these rules is the primary responsibility of all employees. In this context, employees are expected to:

- Act in accordance with laws and regulations under all circumstances.
- Read the Institution's Ethical Rules and be familiar with, understand, internalize, and act in accordance with the rules, principles, and values contained within.
- Avoid behaviors that create an environment of rumors and gossip about the institution and colleagues, which disrupt workplace productivity.
- Not show favoritism or subject anyone to special treatment based on gender, religion, language, or race during the patient care process.
- Learn the general and specific policies and procedures relevant to the institution and their work.
- When facing a situation not explicitly written in our ethical principles and related regulations, act in light of our foundational characteristics and consult their unit manager or Human Resources for clarification; reach out to the Internal Audit Unit for solutions.
 - Promptly report any potential violations by themselves or others. Notifications regarding these matters can be submitted via **WhatsApp** or **Telegram** at the number **0530 510 7373**, or via email at **etik@mlpsaglik.com.tr** (reports can be named or anonymous based on the notifier's preference), and can also be **communicated to their manager if desired or directly to the Internal Audit Department**.
 - Notifications made to the Ethics Line do not require managerial approval; reports regarding violations of business ethics cannot be obstructed in any way, and employees may report without consulting their managers in accordance with the "**Ethics Notification Line Procedure**".
- In ethical investigations, they must cooperate with the "Internal Audit Unit," "Academic and Ethical Board," and "Disciplinary Board," and maintain confidentiality regarding information related to the investigation.

4. Responsibilities of Managers

In addition to the responsibilities defined for employees within the framework of ethical rules, institution managers have additional responsibilities. Accordingly, managers are expected to:

- Ensure the creation and maintenance of a company culture and working environment that supports ethical rules.
- Be exemplary in the application of ethical rules through their behaviors, train employees on ethical rules, and provide leadership.
- Support employees in conveying questions, complaints, and notifications regarding ethical rules.
- Provide guidance when consulted on necessary actions, consider all notifications received, and forward them to the Internal Audit Unit and/or the Academic and Ethical Board as needed.
- Ensure that business processes under their responsibility are structured to minimize ethical risks and implement necessary methods and approaches to ensure compliance with ethical rules.
- Guide and consult employees on questions and issues conveyed regarding ethics within the institution.
- Refer unresolved or inappropriate matters that require investigation to the Internal Audit Unit and/or the Academic and Ethical Board.

- Contribute to the resolution of internal ethical violations reported to them upon the request of the "Internal Audit Unit," "Academic and Ethical Board," and "Disciplinary Board."
- Report questions and violations related to ethics received by them, along with the outcomes, to the Internal Audit Unit.
- Monitor and support the effectiveness of ethical practices implemented within the company.

5. Other Responsibilities

- The senior management of the institution is responsible for the effective implementation of the company-specific Business Ethics Rules that they may create and for establishing a culture that supports these rules.
- The Business Ethics Rules and all related policies will be reviewed, revised, and documented by the Human Resources Directorate with the recommendations of the Disciplinary Board and announced to the institution with the approval of the Board Chairman.
- Human Resources:
 - Is responsible for providing periodic training to inform employees about the Ethical Rules and ensuring the clarity of the policies and rules and for maintaining ongoing communication on this topic with employees.
 - Ensures that new employees read and are informed about the ethical rules.
- Disciplinary Board:

The Academic and Ethical Board is responsible for investigating and resolving complaints and notifications regarding violations of ethical rules within the institution's rules. The Board operates under the authority of the Board Chairman.

- Institution management collaborates with the "Internal Audit Unit," "Academic and Ethical Board," and "Disciplinary Board" to:
 - Guarantee the confidentiality of complaints and notifications made within the framework of ethical rules and protect individuals following notifications.
 - Ensure the job security of employees who report notifications.
 - Guarantee that complaints and notifications are investigated in a timely, fair, consistent, and sensitive manner and take necessary actions decisively as a result of violations.

Those who violate the Business Ethics Rules or institution policies and procedures will be subject to various disciplinary sanctions, which may include a request for resignation, in accordance with the "**Disciplinary Procedure**". Disciplinary actions will also apply to those who endorse, direct, or have knowledge of inappropriate behaviors and violations of rules but fail to make the necessary notifications appropriately (e.g., covering up).

6. Principles of Operation of the Board

The Academic and Ethical Board conducts its work in accordance with the "**Academic and Ethical Board Operating Procedure**" and the principles outlined below:

- Maintains the confidentiality of the identity of those making notifications or complaints.
- Conducts the investigation within the framework of confidentiality as much as possible.

- Has the authority to request information, documents, and evidence directly from the relevant unit concerning the investigation.
- Can examine any information and documents obtained solely related to the subject of the investigation.
- The investigation process is documented in writing from the outset. Information, evidence, and documents are attached to the record.
- The record is signed by the chairman and members.
- Investigations are handled promptly, and conclusions are reached as quickly as possible.
- Decisions made by the board are immediately put into effect.
- Relevant departments and authorities are informed of the results.
- The chairman and members of the board carry out their duties independently and without influence from their departmental managers or the hierarchy within the organization. They cannot be pressured or persuaded regarding the matter.
- The board may seek expert opinions if deemed necessary and can utilize experts while ensuring that confidentiality principles are not violated during the investigation.

Ethical Principles are accepted and applied by our employees and stakeholders. As the group grows and encounters new issues in the regions and sectors where it operates, the ethical principles are regularly reviewed to ensure their relevance and validity. Within the Ethical Principles, Disciplinary Rules are clearly explained.

Our company values contributing actively to the United Nations Sustainable Development Goals, specifically in decent work and economic growth (SDG 8) and promoting peace, justice, and strong institutions (SDG 16).

The effective implementation of this policy is the responsibility of all employees. Senior management will conduct regular audits to ensure compliance with the policy and will make updates as necessary.