

## MLP BUSINESS ETHICS RULES

### 1. Our Ethical Approach

These ethical values (the "**Ethical Values**") have been prepared in order to regulate the internal relations within MLP Sağlık Hizmetleri A.Ş. ("**MLP**") as well as the relations of the MLP executives and employees with the patients, suppliers and other shareholders, ensure the efficient use of resources, carry out all kinds of activities openly, transparently and in accordance with the applicable legislation, prevent unfair competition, increase the corporate value of MLP and create consciousness among the MLP executives and employees regarding corporate and social responsibility.

The persons and institutions indicated below are obliged to comply with the Ethical Values:

- MLP
- Members of the Board of Directors or Board of Managers, executives and employees of MLP, MLP's subsidiaries, affiliates and business partners, doctors providing services against invoice at MLP, MLP's subsidiaries, affiliates and business partners, doctors employed by MLP's health service providers ("**MLP Employee(s)**")
- Subsidiaries of MLP and MLP liaison offices abroad (MLP and MLP Employees shall be collectively referred to as the "**MLP Entities and Employees**").

Within this scope, the Ethical Values operate as guidelines relating to the responsibilities that should be observed by the MLP Entities and Employees.

The Ethical Rules are in unity with the policies, values and principles of MLP. The services offered by MLP are carried out within the framework of the MLP policies, professional standards, the public perception regarding MLP and the Ethical Values, and utmost efforts shall be made to fulfil all kinds of relevant obligations.

MLP has dedicated itself to the conduct of its activities in an honest manner at all times. Decency, honesty, transparency and openness constitute the foundation of MLP's sustainable commercial success and strong reputation.

MLP believes that transparency is the key to establishing relations with its employees, business partner and patients that are based on trust. Accordingly, MLP conducts its commercial activities and maintains its vision of sustainable growth based on a management mentality that is ethical, transparent and accountable, without concealing its objectives, targets and methods.

All activities of MLP are based on mutual respect.

## **2. Honesty**

MLP Employees shall act decently and honestly in all their dealings with the employees and all shareholders during all work processes.

## **3. Confidentiality**

The trade secrets of MLP consist of the financial and other information that is not yet publicly disclosed, information regarding personal rights of the staff and information within the scope of the "confidentiality agreements" entered into with third parties. MLP Employees pay attention to the confidentiality of their patients, colleagues and other relevant persons and institutions and the protection of their private information, they protect the confidential information relating to MLP and its activities, use such information only in line with MLP's purposes and share such information with third parties only to the extent they are authorized to do so. Even after the termination of their employments with MLP, the confidential information and documents and documents such as procedures, regulations etc. may not be used externally by the MLP Employees.

All documents and information provided by MLP or which are likely to be accessed, including all patient related data, the trade secrets, financial and other information not yet publicly disclosed and the confidential information in the agreements entered into with third parties shall fall within the scope of the duty to protect confidentiality and trade secrets.

MLP is obliged to ensure the protection of the personal information of all its employees and shareholders.

Employees of the Company may from time to time have access to insider information as defined under the capital markets legislation. Employees who receive insider information are obliged to keep such information confidential.

## **4. Our Responsibility to Comply with the Legislation**

MLP conducts its activities within the framework of the local laws and international laws in effect within Turkey and abroad and submits information to the official regulatory agencies and institutions in a correct, complete and timely manner. In all their activities and transactions, MLP Employees shall treat all public entities and institutions, administrative bodies, non-governmental organizations and political organization equally, without any expectations of benefit and perform their obligation with this sense of responsibility.

MLP Entities and Employees are obliged to fully comply with all national rules and regulations, including Turkish health legislation and legislation aimed at the protection of personal data. Furthermore, MLP Entities and Employees shall make utmost efforts to comply with the international standards and rules regarding health practices.

In its dealings with the investors and other shareholders, MLP shall act in accordance with all relevant laws, regulations, rules and principles, MLP's internal regulations and international laws and moral values, without exception.

## **5. Our Responsibilities Relating to the MLP Brand**

MLP Employees must be aware of their responsibilities regarding the institution and the brand. Accordingly, MLP Employees must be aware that they represent the institution, and they are required to protect MLP's reputation before third parties and refrain from acts and behaviours which may place MLP in a difficult position.

When speaking on behalf of MLP, MLP executives and employees of all ranks may only express corporate views and not personal views.

MLP Employees pay attention to representing the brand in all fields in the best manner possible. The employees may not make any negative or potentially harmful statements regarding the brand on any media platform, including social networks, which are undoubtedly influential in today's world. Except for those authorized by the management of MLP, no MLP Employee may express any oral or written opinion, information or comment on the press.

When they are faced with complicated situations that might give rise to risks for MLP, MLP Employees are required to comply with the relevant procedures and consult the authorized persons.

## **6. Our Responsibilities Towards Our Employees**

In line with its mission, and as an institution that is open to different views and opinions and believes in flexible thinking, MLP expects all its employees to be respectful to the patients above all, and thereafter to themselves and other employees, business partners, competitors, the society and the environment. MLP believes that corporate success is based on the talent and performance of dedicated employees. Therefore, all of the persons who are subject to these Ethical Values are required to respect the rights and dignity of each other.

Within this context, MLP shall ensure that its employees act in accordance with the highest standards, are aware of the effects of their acts and attitude on the corporate level and comply with all relevant legislation.

Each professional working at MLP shall pay attention to perform duties in the fields where s/he is and believes to be competent and shall work with business partners who fulfil the decency and validity criteria. MLP Employees are obliged to conduct their dealings with the other employees, the business partners and the shareholders in accordance with business ethics and the ethical values. MLP Employees are also obliged to adhere to the rules determined by MLP in relation to the management, harmony and discipline of the work place as well occupational health and safety, and the instructions, regulations and procedures published in connection therewith.

Except for the Board members and the MLP Employees other than the doctors employed by health service providers who provide services against invoices, MLP Employees may not perform any public or private duties, whether permanent or temporary, whether with or without remuneration, nor may they carry out any commercial activities.

MLP Employees are treated equally by MLP with respect to matters of training, career, employment and promotion, and they are offered equal opportunities.

### **7. Our Responsibilities Towards Our Patients**

MLP Entities and Employees work with a patient oriented mentality, aiming to respond to the needs and demands of our patients as quickly and as accurately as possible. We provide our services in a timely manner and in accordance with our promises, approach our patients observing the rules of respect, dignity, justice, equality and kindness, make utmost efforts to protect all the rights of our patients, including the protection of our patients' personal data, pay attention to customer complaints regarding our services and conduct the necessary examinations and analysis, and offer our patients superior services of the highest quality.

### **8. Bribery and Corruption**

MLP Entities and Employees are obliged to comply with all rules and principles stated within the scope of the Procedure of Combat Against Bribery and Corruption prepared by MLP.

### **9. Conflicts of Interest**

In the event of any actual or potential conflicts of interest between the personal interests of MLP Employees and the interests of MLP or the subsidiaries, affiliates or business partners of MLP, MLP Employees are expected to perform their tasks and duties by giving priority to the interests of MLP and its subsidiaries, affiliates or business partners.

MLP Employees shall refrain from any initiatives which may amount to the deriving of benefits for themselves or persons close to them.

The foregoing events are considered as events which give rise to conflicts of interest:

- If an MLP employee delegates business to a company where the employee's family members or relatives up to the third degree are employed.
- If the employee obtains loans from or has commercial relations with the firms with which it conduct business.
- If the employee's family or relatives up to the third degree have any shareholding in a competitor or have a relationship based on interests with a competitor.

Potential and foreseeable conflicts of interests and events which are defined by MLP's management are shared with MLP Employees and all kinds of measures relating to the foregoing are taken by the management of MLP. MLP Employees are obliged to report the conflicts of interest observed by them to the Discipline Committee.