



# CODE OF CONDUCT



At Marm Assistance, our ethical values form the foundation of how we conduct business. By adhering to these values across all our processes, from management to the field, we work together as a family rather than just a team. The adoption of this ethical understanding by each of our employees strengthens us and enables us to move forward with more confidence into the future.

Our Code of Conduct guides us to prioritize transparency, fairness, and respect in our daily interactions while also helping us maintain our credibility. These principles define not only how we achieve success but also how we sustain our leadership position in the industry.

Our aim is to create a working environment where every employee feels comfortable and secure. We want you to know that we have a culture of transparent and sincere communication. Please do not hesitate to share your thoughts and concerns, as we are all growing, developing, and working towards a better future together.

Together, we will continue to achieve more.

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*Bilge BORA*  
CEO





# MARM ASSISTANCE

Since 1986, Marm Assistance has been providing assistance services globally, consistently maintaining the highest standards of integrity and professionalism across all our operations and interactions at every level. Throughout this period, we have been dedicated to upholding universal ethical principles, ensuring customer satisfaction and trust at the highest level.

Ethical excellence serves as the cornerstone of all our operations. In all relationships we establish with our business partners, customers, and employees, we prioritize transparency, fairness, and respect. Accordingly, we adhere strictly to our code of business ethics and uphold ethical behavior standards in every situation.



Each of our employees has embraced Marm Assistance's ethical values and integrated them into their way of conducting business. Through our training programs and continuous feedback mechanisms, we make every effort to maintain and enhance our ethical standards. We are committed to creating a safe and respectful work environment by enforcing a zero-tolerance policy for any unethical behavior, including discrimination, misconduct, negligence, abuse, threats, intimidation, or humiliation.

As Marm Assistance, our goal is to provide the best service to our clients, grounded in the principle of ethical excellence, and to be recognized as a trusted name in the industry. In line with these principles, we are committed to maintaining a healthy work environment and continuing our operations and collaborations with unwavering dedication.





*Ethical Principles Guide the Way!*





# Core Principles

## Integrity and Transparency

We place great importance on being honest and transparent in all our relationships with employees, clients, business partners, suppliers, and official authorities. We avoid providing misleading information and act in accordance with the principles of honesty and integrity.

We foster a working environment based on accurate information sharing and open communication. By encouraging transparency in our business processes, we maintain the trust of all our stakeholders.





# Core Principles



## Professionalism and Respect

All our employees are expected to carry out their duties with the highest standards and diligence. We adhere to professional codes of conduct in our business processes and treat our colleagues, clients, business partners, and suppliers with respect.

## Legal and Regulatory Compliance

As Marm Assistance, we are committed to full compliance with the legal regulations in every region where we operate. In all our business processes and decision-making, we respect the law, obtain the necessary permits on time, and ensure full adherence to regulations.





# Core Principles

## Confidentiality and Data Protection

Marm Assistance's confidential information and intellectual property are key assets of our company and provide a competitive advantage.

Certain information related to Marm Assistance is confidential and is generally protected under financial information, trade secrets, or other legal rights.

1

We also place great importance on the confidentiality of customer and employee information. We take all necessary measures to protect confidential information and prevent unauthorized access.

2

We comply with legal regulations and best practices regarding the protection of personal data. We use technology and procedures that adhere to legal requirements to ensure data security.



### REMEMBER

*You must obtain your manager's approval before sharing Marm Assistance's confidential information with another party or accepting another party's confidential information. Additionally, a confidentiality or other appropriate agreement approved by the Marm Assistance Legal Department must be signed between Marm Assistance and the relevant party. Inappropriate disclosure of Marm Assistance's confidential or proprietary information could threaten our competitive advantage. Adhere to all measures established by Marm Assistance to protect this information and share it only in an authorized manner. Also, do not forward this information to personal email addresses or share it with individuals not involved in the matter.*



Marm Assistance's proprietary information encompasses all types of company information, including, for example:

- *Details of current and future services (details that may be considered trade secrets)*
- *Undisclosed strategies or expectations such as business plans or projections, potential acquisitions, or divestitures*
- *All financial data*
- *Information contained in online storage and databases*





# Core Principles

## Ethical Excellence

At Marm Assistance, we are committed to upholding the highest ethical standards in the assistance services we provide to our clients. Ethical excellence is based on integrity, transparency, and fairness in all our business processes. We prioritize accuracy and honesty in our relationships with clients, ensure full compliance with legal regulations, and protect customer confidentiality. These values reflect our commitment to remaining a trusted leader in the assistance industry.



## DID YOU KNOW

*At Marm Assistance, we value the ability of our employees to freely share their opinions and concerns. Therefore, we would like to remind you of some ways to share your concerns or issues with us.*



### **PLEASE NOTE**

*We have zero tolerance for verbal or physical harassment in the workplace. If you witness or experience harassment, report it immediately. If you have any concerns about harassment, you can report it safely. Protecting your rights and ensuring a safe work environment is our priority. We address all instances of harassment seriously and are committed to providing you with the necessary support.*

### **Open Door Policy**

You have direct access to management for open discussions or any concerns or issues.

### **Confidential Reporting Option**

You have the option to provide feedback anonymously and express your concerns without disclosing your identity. You can share your concerns and objections with us through our online platform, email, or by sending a letter to our postal address. We are always here to support you and aim to create a better work environment by working together.



*Moving Forward with Respect and Fairness!*







# Our Values

## Trust and Respect

Trust and respect are fundamental among our employees. We promote reliability and mutual respect in all our relationships.

## Reliability and Quality

As a pioneering company with a rich history, we deliver quality and reliability to the highest standards.

## Social Responsibility

We act with environmental sensitivity and a sense of social responsibility.

## Discipline and Professionalism

We ensure sustainability and integrity in our industry by working with a high level of discipline and professionalism.

## Teamwork and Sense of Belonging

We value teamwork, team spirit, and a sense of belonging. We strive to ensure that every employee feels valued in a family-like environment.

## Customer Focus and Efficiency

We prioritize the customer experience, providing quick and effective solutions. We create every possible solution to maximize customer satisfaction by enhancing efficiency.

## Employee Value

The happiness and well-being of our employees are our priorities. We value our employees, respect them, and support their professional development.

## Innovation

We lead the industry with our innovative approaches and continually aim for new developments.



# Our Commitment to Ethical Work Practices



## PLEASE NOTE

*If you observe inconsistencies in records, unexplained payments, or pricing significantly different from the norm, report them immediately and take necessary precautions. At Marm Assistance, we have adopted a zero-tolerance policy towards corruption and unethical business practices. It is our collective responsibility to maintain the transparency and integrity of our work environment.*



## Corruption-Free Workforce

Marm Assistance does not tolerate corruption, bribery, or other unethical influences in its records. We place great importance on the principles of integrity and transparency in all our relationships with business partners, customers, suppliers, and employees. We avoid providing misleading or incomplete information and promote the sharing of accurate and reliable information. We take necessary measures to prevent any irregular activities both within and outside the company.

## Ethical Employment Practices

We promote fair working standards by respecting the dignity of all our employees. We do not tolerate any practices that violate human rights, such as forced labor or child labor, either within our company or among our business partners. In carrying out our duties, we ensure to protect the reputation of Marm Assistance, our customers, and our business partners.





# Our Commitment to Ethical Work Practices

## Inclusion and Diversity

It is crucial for us that each of our employees works in a healthy, safe, and productive environment. We aim for everyone to feel valued and respected. Discrimination based on race, color, language, religion, gender, gender identity or expression, sexual orientation, pregnancy, national origin, genetic information, disability status, or age is never tolerated in our workplace. We do not condone sexual harassment, racial or religious insults, bullying, or any other forms of offensive behavior.

We value differences and support diversity with equal opportunities for all. We encourage the collaboration of individuals with various cultural, linguistic, gender, and skill backgrounds. Our goal is to create a work environment where all employees feel secure and valued, enabling us to build a stronger and more effective workplace together.





# Our Commitment to Ethical Work Practices



## Transparent Management

We maintain transparency in both business and personal relationships, clearly disclosing any potential conflicts of interest and ensuring they are reported as needed.

## Conflict of Interest Prevention

It is important that our employees do not allow personal interests to influence their work decisions. We implement necessary policies and procedures to prevent and transparently manage conflicts of interest.





*Moving Forward with Innovative Solutions!*





# Environmental and Social Contributions

## Environmental Protection

We prioritize environmental protection and sustainability initiatives in our business operations. We integrate eco-friendly practices such as waste management, energy conservation, and recycling into our processes. Marm Assistance is firmly committed to environmental protection standards, and our ISO certifications reflect this dedication.

## Innovative Technologies and Digitalization

We employ innovative technologies and digital solutions to enhance sustainability and efficiency. By staying up-to-date with technological advancements, we continuously improve our processes.



# Environmental and Social Contributions

## Health and Safety Practices

The health and safety of our employees and customers come first. We promote good workplace practices aimed at enhancing safety measures. By regularly updating occupational health and safety standards, we ensure a safe working environment through ongoing training and inspections. With our emergency preparedness plans and risk management strategies, we take proactive steps against potential hazards.



## Training and Awareness Initiatives

As part of our environmental and social responsibilities, we aim to raise awareness among our employees. We keep them informed of the latest updates and developments in environmental protection, health, and safety, ensuring the necessary awareness in these areas.



*Secure Your Future with Privacy!*





# Our Business Partners and Supplier Relationships

## Fair Competition and Antitrust Law

At Marm Assistance, we are fully committed to fair competition principles in our relationships with business partners and third parties. We strictly avoid exchanging information on pricing, customer sharing, supplier relations, and similar matters with competitor companies. In line with this, we ensure full compliance with antitrust laws, contributing to the preservation of a fair competitive environment. At Marm Assistance, we regularly hold Antitrust Law training sessions to raise awareness on this subject.



### **PLEASE NOTE**

*Exchanging trade secrets/confidential information with employees of a competing company is a criminal offense. If you accidentally or intentionally receive confidential information from a competitor (such as a price quote) from a customer or someone else, do not review, distribute, or otherwise use this information. Instead, immediately contact the Marm Legal Department for guidance on how to proceed.*

## **REMEMBER**

To protect the assets, data, proprietary, and confidential information of Marm Assistance, as well as the assets of others, please take the following precautions:

- ▶ Strictly adhere to Marm Assistance's information security policies, controls, and processes.
- ▶ Never share your passwords with others.
- ▶ Use all devices, including laptops, mobile phones, servers, and personal electronic devices (such as smartphones and portable storage media), in accordance with Marm Assistance policies for business purposes.
- ▶ Comply with legal or other requirements specific to certain types of data, such as health information.
- ▶ Regularly attend training on information security and personal data protection planned by Marm Assistance.
- ▶ Avoid using personal accounts (email, instant messaging, social media, cloud storage, video conferencing, etc.) during your work activities.

These measures are essential for protecting the valuable assets of Marm Assistance and ensuring the security and confidentiality of information.



# Our Business Partners and Supplier Relationships

## DID YOU KNOW

*There are severe penalties for providing financial benefits or any value to service providers and/or public officials in any industry. "Any benefit" can include anything of value, such as meals, gifts, entertainment, transportation, accommodation, recruitment, or donations, including money. Ensure that you do not engage in or are part of such relationships.*



We prioritize transparency and honesty in our relationships with suppliers and customers. We ensure that our contracts are comprehensive and well-documented, clearly documenting any changes or additions. In our supplier evaluation processes, we operate based on objective criteria and make our selections in accordance with price, quality, performance, and all other criteria specified in writing.

## Anti-Corruption

At Marm Assistance, we adopt a zero-tolerance policy towards corruption. We do not allow our employees, business partners, or suppliers to engage in any corrupt activities, and we impose serious disciplinary measures in the event of such occurrences. We avoid offering any benefits or gifts to public officials or individuals in similar positions and implement strict controls and training to prevent such situations from arising. Similarly, we ensure that our employees and suppliers are warned to make decisions on behalf of the company that are free from personal interests or any situation that could be perceived as such in their relationships with customers, suppliers, and other business entities.





# Anti-Money Laundering and Counter Terrorism Financing

At Marm Assistance, we will never contribute to money laundering or the financing of terrorism. In this regard, we ensure full compliance with applicable laws, verify the identities of our customers and business partners, and report suspicious transactions. We take any violations regarding money laundering and the financing of terrorism seriously.

These Ethical Conduct Rules reflect our commitment to uphold our values and maintain high standards in all aspects of our business, going beyond merely being a rulebook. By supporting our mission to provide trustworthy and ethical support services, we ensure that Marm Assistance remains a reliable leader and innovator in the industry.







# Compliance and **Auditing**



## **1** Comprehensive Auditing

We ensure compliance with this Code of Ethics across all assistance programs through regular audits, reviews, and other independent evaluations. This aims to preserve the impartiality that forms the foundation of our services.

## **2** Liability for Non-Compliance

Violations of these rules will be met with serious consequences, including the termination of partnerships and the implementation of corrective measures to address such violations.

## **3** Commitment to Improvement

We are committed to improving our ethical practices. Therefore, we regularly update our policies to align with new regulatory requirements and global best practices, keeping our employees, customers, and partners informed.





# Compliance and Reporting of Violations



## **REMEMBER**

*If you report a violation, you will not face any retaliation or adverse consequences as a result of your report. We will protect your good faith reports and provide a safe work environment for you. Even if your report cannot be substantiated at the conclusion of the process, your protection and confidentiality will continue. Do not hesitate to report violations; your reports will always be taken seriously, and your rights will be safeguarded.*



We establish a transparent reporting process to ensure swift notification of violations and the implementation of necessary measures. Our employees may report any violations of the Code of Ethics directly to their supervisors, the Human Resources or Legal Department, or through the "Marm Assistance Ethics and Compliance Hotline." All reports are treated confidentially, and the accuracy of any alleged violations is thoroughly investigated.

We conduct regular awareness activities to ensure that our employees understand that non-compliance with laws or the Marm Assistance Code of Ethics is strictly prohibited. Any such violation, regardless of the employee's position, will result in disciplinary actions.

In the event that an employee reports a violation to us, we are obligated to protect that employee from retaliation or harm as a result of their good-faith report, ensuring their safety and protection. This protection remains in place even if the reported violation is not substantiated during the investigation process.



*Success Comes with the Right Values*

**malim**

**medical  
assistance  
roadside  
management**



# Marm Assistance Ethics and Compliance Hotline

Marm Assistance provides a secure and confidential platform to report potential ethics and compliance violations. Reports can be made anonymously. Both employees and external parties can access the system.

## Online Form

<https://www.marmassistance.com/en/kalite>

## Contact Information



E-Mail: [etikhat@marm.com.tr](mailto:etikhat@marm.com.tr)



Postal Address : Harmandere Mah. Ankara Cad. No: 486/1 Airport Plaza K:4 Pendik/ İstanbul

***Disclosure of identity is not mandatory when submitting a violation report.***

*This Code of Conduct may be updated from time to time. You can access the latest version on our website.*

