OUR PRINCIPLES

Drawing its strength from its “principles and values”
Section I

OUR COMPANY

- Message from the Chairman of the Board of Directors and the General Manager ................................................................. 3
- Our Vision .................................................................................................................................................................................. 6
- Our Mission ................................................................................................................................................................................. 6
- Our Corporate Values ................................................................................................................................................................. 7
- The Journey of Bilim Pharmaceuticals .................................................................................................................................. 8
- Our Milestones .............................................................................................................................................................................. 9

Our Management Models
- EFQM Excellence Model ................................................................................................................................................................. 10
- Corporate Responsibility .............................................................................................................................................................. 11
- Corporate Governance Principles .............................................................................................................................................. 11
- Reputation Management ................................................................................................................................................................. 11
- Ethical Management ....................................................................................................................................................................... 12

Section II

OUR PRINCIPLES

- Our Commitments according to Integrity and Honesty ............................................................................................................. 16
- Compliance Program ....................................................................................................................................................................... 16
- Confidentiality .................................................................................................................................................................................. 17
- Our Transparency and Open Door Policy .................................................................................................................................. 17
- Our Responsibilities as the Employees ........................................................................................................................................ 17

Pharmaceuticals Industry and Our Market Relations
- Our Commitments ........................................................................................................................................................................... 18
- Health Legislation: Laws and Regulations .................................................................................................................................. 18
- Ethical Promotion Activities and Relations with Healthcare Professionals ................................................................................. 18
- Quality of Our Products ................................................................................................................................................................. 19
- Disclosure of product-related information and experiences ....................................................................................................... 20
- Confidentiality of Patient Information ........................................................................................................................................ 20
- Bribery and Corruption ................................................................................................................................................................. 20
- Competition and Anti-Trust Laws ................................................................................................................................................ 21
- Commercial Issues ......................................................................................................................................................................... 21

Relations with our Shareholders
- Our Commitments ........................................................................................................................................................................... 22
- Audit Reports .................................................................................................................................................................................... 22
- Confidentiality and Company-Specific Information ...................................................................................................................... 23
- Use and Handling of Corporate Computers and Resources .................................................................................................... 23
- Avoiding of Conflict of Interest .................................................................................................................................................... 25

Our Employees
- Our Commitments ........................................................................................................................................................................... 25
- Our Equal Opportunity Policy ......................................................................................................................................................... 26
- Discrimination and Abuse ............................................................................................................................................................... 26
- Use of Alcohol and Narcotics ......................................................................................................................................................... 26

Our Community and Public Relations
- Our Commitments ........................................................................................................................................................................... 26
- Our Contribution to Society ........................................................................................................................................................... 27
- Our Volunteer Projects ................................................................................................................................................................. 27
- Our Sensitivity to Ecological Environment ................................................................................................................................ 28
- Our OHS&E Rules .............................................................................................................................................................................. 29
- Protection of Volunteers and Subjects in Clinical Trials ............................................................................................................... 29
- Media and Public Disclosure .......................................................................................................................................................... 30
- Non-Governmental Organizations ................................................................................................................................................ 30
- Statutory Investigations and Request for Information .................................................................................................................. 30
Message of the board
Dear Bilim Family,

Our “corporate values” that we have carefully and patiently distilled over the years from our experiences are our most trustworthy guide carrying Bilim Pharmaceuticals, i.e. all of us to success and also leading us in our journey to the future. Our corporate values that have been enriched with our individual values have currently enabled Bilim Pharmaceuticals to become one of the fastest growing companies in the Turkish pharmaceuticals industry. For many years, we have walked on our path in the light of the same values remaining faithful to the same targets and maintaining our people-centricity and we have always been aware of the straight line differentiating us, the people of Bilim Pharmaceuticals from others and filling us with pride in all environments involved. We have believed that being a “good company” is more important than earning money and we look to our future with confidence maintaining this belief. With all of its employees, and all stakeholders and clients, Bilim Pharmaceuticals is a “good model company” that has always been sincere, modest, but proud, guiding us in the journey to success and blooming and leaping up with our accumulating knowledge and experiences and holding our hand since the very foundation of the company in 1953.

We believe that competition will become more meaningful with an understanding of management based on our core principles and values, our people-oriented corporate management understanding, our reputation model, our policies and our corporate responsibility feeling. Our experiences that have been gradually blooming up in every year since the year of 1998 in which we have started to implement the EFQM Excellence Model have helped us to draw up the corporate framework of Bilim Pharmaceuticals.

The employees of Bilim Pharmaceuticals reassure themselves with this understanding every day and are aware of the strength drawn from the corporate values. Just as the term Bilim (science in Turkish) lightens up the future, Bilim Pharmaceuticals is also forging ahead on its path to become a model-setting corporation lightening up the path of the Turkish pharmaceuticals industry.

With its belief in becoming a “good company” not only in its own industry, but also among all industries, its passion for change, and its policies and processing targeting human happiness, Bilim Pharmaceuticals have always crowned “its employees” for the successes achieved. It always has been, is and will be as such in the future.

Yours faithfully,

Bülen Karadağ  
Chairman of the Board

Dr. Erhan Baş  
General Manager

[Signatures]
SECTION I
Our Company
Our Vision

By the end of the year 2014;
To rank among the top 2 companies in the Turkish pharmaceuticals market
To become the export leader among the local pharmaceutical manufacturers.

Our Mission

Bilim Pharmaceuticals develops drugs that maintain human health and provide treatment and produces such drugs in its modern and high-tech facilities in compliance with international standards.

Following a customer-centric approach in advertising and marketing of its drugs in the domestic and export markets, it maximizes the availability of drugs and the customer satisfaction.

It displays a productive, profitable and sustainable growth fostered by its experiences gained as a deep-rooted company that has adopted the concept of quality as a philosophy of life and attached high value to people and human life, its collaborations maintained through further developments and its dedication to change.

It maximizes the engagement and satisfaction of the employees by means of its innovative human resources systems and an organizational culture open to learning which are implemented with the awareness that competent and qualified employees will be a driving force in competition.

It protects the environment and natural resources with its awareness of social responsibility, places importance on ethical values, and contributes to the social and economic development of the society.
Our Corporate Values

**Human Happiness**
We know that the quality of life stems from human happiness. We consider that our employees' competencies are reflected into the happiness of our clients and we believe that the concept of respect to people is the most important link of this chain.

**Respect to Future Generations**
We know that we have responsibilities towards the world and we consider that all global resources are required to be used reasonably. We attach high importance to contributions to the society in respect of economic, ecological and sociological aspects.

**Change**
We think that change not only means being open to innovations, but also leads to differentiation and progress. We believe that we should continuously enhance and improve our business activities acting with the principle of excellence.

**Ethical Management**
We are aware of the triangle of equality, accountability and transparency. We consider that being ethical constitutes the spine of our decision-making processes and the national and global laws and rules should be complied with duly.

**Passion for Success**
We know that the passion is the first step taken in the journey to success. We think that a solution-oriented and positive point of view will carry us to the greatest successes. We believe that each and every rising sun is the messenger of a new success.
The Journey of Bilim Pharmaceuticals

The foundations of Bilim Pharmaceuticals were established with Bilim Laboratory founded in 1953. Having operated under the trade-name of Bilim Tibbi Müstahzar Laboratuvarı Ltd. Şti. (Bilim Medical Pharmaceuticals Laboratory Ltd.) since 1961 and under the trade-name of Bilim İlaç Sanayi ve Ticaret A.Ş. (Bilim Pharmaceuticals Industry and Trade Inc.) since 1968, our company was subjected to a restructuring in 1974 and as a result, the company now maintains its activities under the structure of BILFAR Holding. Bilim İlaç Sanayi ve Ticaret A.Ş is a company with 100% Turkish capital operating in the fields of production, marketing and R&D activities related with human drugs that are of strategic importance.

Bilim Pharmaceuticals conducts its production activities in two separate plants located in Çerkezköy and Gebze, which are designed in compliance with cGMP (current good manufacturing practices). Bilim Çerkezköy Beta-lactame production facility approved by the German Ministry of Health and covering an indoor area of 9,250 square meters has been in operation since 1998. Bilim Pharmaceuticals Ayazaga-Istanbul production site which has been in operation since 1975 was moved to its new premises with an area of 60,000 square meters located at Gebze Organized Industrial Zone in 2008 in order to meet the increasing production requirements and to achieve the high export targets. With its indoor area of 51,500 square meters, Bilim Gebze is the largest drug processing facility in Turkey according to the production forms, has the production capacity of 250 million boxes per year and able to produce 17% of the medicines in the Turkish pharmaceuticals industry. It is also considered among the biggest facilities in Europe as well and it has been designed and constructed in accordance with the American FDA standards.

Proceeding on its way with the vision to be one of the top 2 companies in the Turkish pharmaceuticals market and to become the local pharmaceuticals manufacturer achieving the highest export by the end of 2014, Bilim Pharmaceuticals competes in global markets with the quality and characteristics of its products and exports to 48 countries as per the year of 2011.

Bilim Pharmaceuticals took the 3rd place with a market share of 5.1% in the Turkish pharmaceuticals market which reached to 14.8 billion TL in 2010. Considering the number of packs sold, Bilim Pharmaceuticals has also closed the year in the 3rd place with the sales of 100.4 million packs and furthermore, having also completed the year in the 2nd place in respect of the preferences in prescriptions of the physicians, it has been the drug manufacturer preferred in 6.7 out of every 100 prescriptions written. Bilim Pharmaceuticals is one of the top 5 companies that have achieved the highest sales volume in three of the top five segments (antibiotics, respiratory drugs and musculoskeletal system drugs) with the highest rates of drug use as observed particularly in Turkey.

Currently, the company has 198 licensed drugs in the Turkish pharmaceuticals market in the following segments: cardiovascular system, central nervous system, diabetes, respiratory system, gastrointestinal system, analgesics and antipyretics, dermatologicals, antibiotics, anti-parasitic drugs, muscle relaxants, drugs for eye and ear diseases, flu and cold medicines and also iron preparations, vitamins and minerals, artificial sweeteners, etc. Having always followed the line of success by incorporating into its production schedule the drugs awaited by the physicians since its very first date of foundation to today, Bilim Pharmaceuticals looks to the future with confidence with its strong and modern product portfolio.
European Business Award – Ruban d'Honneur Kocaeli Chamber of Industry, "Sahabettin Bilgisu Environmental Award" "The Most Competitive Company of the Year Award" given by Sededef and Competitiveness Forum National Quality Award "Continuity in Excellence Award" Respect for People Award received from Kariyer.net in the pharmaceuticals industry category

Bilim Gebze facility received the approval of the British Ministry of Health Respect for People Award received from Kariyer.net in the pharmaceuticals industry category The Most Successful Volunteer Programme Award from the Private Sector Volunteer Foundation CRS Turkey-CRS Europe Corporate Social Responsibility Solutions Award in Turkey

Bilim Gebze Production Facility was commissioned and put into service. Respect for People Award received from Kariyer.net in the pharmaceuticals industry category PERYON Special Prize – Private Sector Volunteers Foundation and PERYON Awards from the Heart

Milestones

2010
- Bilim Gebze facility received the approval of the British Ministry of Health
- Respect for People Award received from Kariyer.net in the pharmaceuticals industry category
- The Most Successful Volunteer Programme Award from the Private Sector Volunteer Foundation CRS Turkey-CRS Europe Corporate Social Responsibility Solutions Award in Turkey

2009
- Bilim Gebze Production Facility was commissioned and put into service.
- Respect for People Award received from Kariyer.net in the pharmaceuticals industry category

2008
- Bilim Gebze Production Facility was commissioned and put into service. Respect for People Award received from Kariyer.net in the pharmaceuticals industry category PERYON Special Prize – Private Sector Volunteers Foundation and PERYON Awards from the Heart

2006
- Bilim Çerkezköy Production Plant received the Approval of the German Ministry of Health National Quality Grand Prize, the first in the pharmaceuticals industry "Standard of Excellence Award" received from Web Marketing Association’s International Web Award competition, in the category for the pharmaceuticals industry

2007
- Respect for People Award received from Kariyer.net in the pharmaceuticals industry category

2004

2000
- Istanbul Chamber of Industry – Industrial Environmental Initiative Award

1998
- Ministry of Environment – Environment Certificate
- Bilim Çerkezköy Plant was commissioned and put into service EFQM Excellence Model was adopted as the corporate management model of Bilim Pharmaceuticals.
EFQM Excellence Model

As Bilim Pharmaceuticals, positioned in a sensitive sector directly related with human health and treatment of diseases, we prioritize quality and adopt respect to future generations as a corporate value.

Our quests for achieving results that will ensure happiness of all our stakeholders and the society and for guiding in the journey to quality in our sector have led us to adopt the EFQM (European Foundation for Quality Management) Excellence Model in 1998 and to conduct and maintain all of our activities within the framework of this model since 1998.

EFQM Excellence Model and Our Employees

EFQM Excellence Model is considered as one of the core competencies that each of our employees is required to acquire; therefore, it is included in our training plans; and constitutes the Standard Occupational Development Program required to be taken by each of our employees in a short period after they start work. Besides such training environments created within the frame of these training plans, our annual communication and participation plan also determines the environment and timing and the persons that will share the model-related approaches with the employees.

“Communications and participation events” are organized for encouragement, promotion and supporting the participation of all our employees both on an individual and on a team basis in order to develop our management approach related with EFQM Excellence Model with the participation of our employees and such events are carried out throughout the year with the activities performed under the strategy of “increasing the employees’ participations. Participation of the employee representatives at any level in our boards, Individual Recommendation System, Quality Improvement Project and Circle of Quality activities can be given as examples to such events.

EFQM Excellence Model and our Clients

EFQM Excellence Model is mainly based on determining the expectations and requirements of the stakeholders and configuring the processes in order to meet them. In accordance with the EFQM Model, we attach special attention to our clients considered among our stakeholders. We use various tools such as Satisfaction Survey used for measuring our clients’ expectations and requirements, Focus Group Activities, Advisory Boards, etc; but the physician and pharmacy visits conducted by our Medical Representatives probably are the most important tool. The feedbacks received with all these tools are directly reflected into the Strategic Plan and are determinative. Provision of products and services to our clients in line with their expectations through the activities included in our Strategic Plan is considered among our top priorities.

The Customer Satisfaction Surveys that we have implemented since 2001 show that the satisfaction level has exceeded 96% in 2009. This high customer satisfaction level that we have achieved is one of the most important and prideful indicators showing that we have successfully implemented the EFQM Model.

EFQM Excellence Model and Our Supplier Relations

Our supply and collaboration policy is essentially based on the approach “to establish and foster sustainable trustful relations with various establishments through assuring mutual success in order to create added value for our clients and other stakeholders”. Within the framework of this approach, there are various applications defined in our regulations in order to determine the required competency criteria applicable during the supplier selection stage, to ensure assessment of suppliers after they start to work, development of suppliers in order to increase their performances and to establish long-term collaborations. In the “Work Partners Summit” that we organize for ensuring cultural collaboration with the suppliers, our mission, vision, corporate values and our strategies are shared, our suppliers satisfactions and perceptions are surveyed and focus group activities are performed in relation to specific issues.

Similarly, scheduled supplier audits are performed in order to increase the efficiency of cGMP (current Good Manufacturing Practices) and IMS (Integrated Management System) adaptation and training programmes are developed and executed for our suppliers in relation thereof. Through our assessment and appreciation systematics, our suppliers’ performances are measured and monitored and they are awarded according to their success points.

EFQM Excellence Model and our Achievements

1998  EFQM Excellence Model was adopted as the standard business model of Bilim Pharmaceuticals.
2004  Competency in Excellence Approval was given to Bilim Pharmaceuticals.
2006  Bilim was awarded National Quality Grand Prize.
2010  Bilim ilac was awarded with the Continuity in Excellence Award, which is the most prestigious award in the Excellence Model. All of the three awards were the only EFQM awards received for the first time in the Turkish pharmaceuticals industry.
2011  Our Target To crown our management system with the European Quality Award.

Place of the EFQM Excellence Model in the Corporate Culture

EFQM Excellence Model is an important integral part of the corporate culture as a management approach currently assisting Bilim Pharmaceuticals to achieve the vision that will allow it to realize its mission. First of all, all of our leaders successfully implement the business processes following the model with an approach and attitude remaining faithful to our values and set good examples to their employees in order to ensure sustainability of such processes. Furthermore, continuous improvement is one of the main approaches adopted by our corporation for successful implementation of change management. Therefore, every year, we review our activities through the evaluation and review meetings addressing all our business processes and implement and activate the required improvements duly.
Our Corporate Responsibilities

As Bilim Pharmaceuticals, we have established the foundations of our sustainability activities in the lighting of the EFQM (European Foundation for Quality Management) Excellence Model which we have put into implementation since 1998. For long years so far, we have been measuring our economic, environmental and social effects and preparing improvement plans in order to reach the excellence.

Upon implementation of the Reputation Management Model since the end of 2006, “sustainability” has taken an important position among our corporate strategies and a Sustainability Board supported by the General Manager and comprised of the persons representing all departments and divisions in the company and entitled with decision-making authorities has been established. Our Sustainability Board prepares strategic plans for integration of the sustainability approach with the business strategies, sets out the targets and monitors and evaluates the applications and practices. Sustainability-related indicators are added to the performance indicators of the boards and directorates that play an active role in the corporate management and the performances and developments in relation thereof are followed up by the board.

There are various applications that we have initiated in 2010 in relation to our economic, social and environmental responsibilities. Some of them can be listed as follows:

- We are the first Turkish pharmaceutical company signing the United Nations Global Compact.
- We have also taken another new ground in the Turkish pharmaceutical industry; we published our Carbon Footprint Report.
- We published the first Corporate Responsibility Report of the Turkish pharmaceutical sector.
- Our Bilim Gebze plant designed with the green building concept received the Environmental Award granted by Kocaeli Chamber of Industry. Our Çerkezköy plant has also received an Environmental Award.
- We focused on teleconferencing in order to decrease the use of vehicles against global heating.
- We started to have our pharmacy bags produced from biodegradable and reusable materials.
- We are an active member of Sustainable Development Association, Ethics and Reputation Association, Turkish Corporate Social Responsibility Foundation, and Private Sector Volunteers Foundation.
- We provide Sustainable Development Trainings to all of our employees.
- We are a member of WWF Turkey; we organize informative and awareness-raising trainings related with global climate change for the physicians.
- We share our environmentally-friendly applications with our business partners and we intend to increase their environmental sensitivity.
- We add value to life with our volunteer and social investment projects.

Who is a Reputation Ambassador?

A person who improves the corporate reputation in the working environment and social environment and who is also sensitive to his/her own personal reputation. A representative acting on behalf of the company and representing all ethical values generally accepted in the community and in the related corporation for all stakeholders. A person acting as the spokesperson of the corporation that can represent his/her corporation and its employees in line with the corporate principles and objectives and contribute in all improvement/renovation activities to be conducted in this field with his/her knowledge and experience.

Bilim Pharmaceuticals is managed with Corporate Governance Principles

We have essentially adopted “Bilim Pharmaceuticals Corporate Governance Principles” based on the core concepts such as fair management, transparency, accountability, business ethics principles and responsibility, etc. Since these principles will ensure the stability of and develop trust to the corporate management. The objective is to ensure sustainability by strengthening the corporate reputation of our company, raising its brand value, increasing the rate of preference by qualified employees, and decreasing the cost of resources. We believe that successful implementation and sustained maintenance of corporate management at Bilim Pharmaceuticals is very important in creating long-term value for our company’s stakeholders.

The responsibilities, structure and activities of the Stakeholders and the Board of Directors, and the liabilities against the stakeholders and the public are defined from a modern management approach within the scope of “Bilim Pharmaceuticals Corporate Governance Principles” that we have put into implementation.

Managing our reputation is our most important work!

As Bilim Pharmaceuticals, we claim to manage our corporate reputation effectively not only in our sector, but also among all industries and pay attention to the goal of being differentiated as a benchmark company about this issue.

Reputation Ambassadors* that we have established in order to raise the awareness of corporate reputation in the company is a platform offering the capability of benchmarking for all companies. On the other hand, Bilim Pharmaceuticals Community Volunteers that we have put into practice with the scope of the volunteer management have now turned into a brand widespread all around Turkey. Reputation management takes an important place in our sustainable development strategic plan at Bilim Pharmaceuticals which has adopted the sustainable development-based business strategies.

Our corporate management complying with the corporate governance principles and our Ethical Board organization in accordance with the business ethics and principles are considered among the important factors allowing for effective management of our corporate reputation. Our company has developed a vision to deploy our corporate values related with corporate reputation defined by it as “its most valuable capital” throughout all our policies and processes. A long-term action plan which will embrace all of our stakeholders and turn the corporate reputation between the societal sensitivities and our company into “confidence” has been put into effect.

Considering the fact that each of our employees regardless of their position and status represent the corporate reputation in their environment, our most important step of high priority is to raise awareness about management of the corporate reputation at the level of all employees of the company. To this effect, our corporate employees are differentiated by “internal stakeholders” and specific “awareness” program is developed and implemented for each stakeholder group.

In this context, Reputation Ambassadors Platform comprised of the employees with high levels of efficiency has been developed. The primary objective of the Reputation Ambassadors Platform is to cover all leaders included within BIL (Bilim Pharmaceuticals Integrated Management Model) and then to turn all corporate employees into Reputation Ambassadors.
Ethical Management

• We look to our future with confidence as long as we can make our corporate values an integral part of our daily lives. Ethical Management considered among these values is one of our values that we have embraced with the highest level of sensitivity.

• Our Ethical Management approach has been prepared taking into account our corporate values and operational principles that have been developed while we have successfully conducted our activities for long years, as well as the Guidelines of IEIS which we are a member of, the Promotion Regulation of the Ministry of Health and the regulation on ethical business life. Our Business Ethics Rules is a guide both protecting our corporation and employees and guiding us in all our decisions and activities beyond all distinctive rules, regulations and procedures.

• Our Business Ethics Rules playing an important role in protecting and further strengthening the trust relationship established between our company’s stakeholders and all related third parties are comprised of 2 sections such as Business Ethics Principles and Policies.

Our Business Ethics Code

1. INTEGRITY, TO BE HONEST AND TRUE
2. TO ENSURE CONFIDENTIALITY OF INFORMATION
3. TO AVOID CONFLICTS OF INTEREST
4. TO FULFIL OUR RESPONSIBILITIES TOWARDS OUR STAKEHOLDERS

4.1 Our Responsibilities Towards Laws
4.2 Our Responsibilities Towards Our Employees
4.3 Our Responsibilities Towards Our Customers
4.4 Our Responsibilities Towards Our Shareholders
4.5 Our Responsibilities Towards Our Suppliers and Collaborations
4.6 Our Responsibilities Towards Our Competitors
4.7 Our Responsibilities Towards the Society, Environment and Humanity
4.8 Our Responsibilities arising from Representation of Bilim Pharmaceuticals Inc.

Our Business Ethics Principles summarize the values that we will be protecting in all areas we operate and our responsibilities toward our stakeholders. You can find Bilim Pharmaceuticals Ethical Management Principles in the following address: www.bilimilac.com.tr
Our Principles supporting Our Business Ethics Code

1. TO CREATE CONDITIONS FOR FAIR COMPETITION
2. TO RESPECT THE CONFIDENTIALITY OF THE COMPANY-SPECIFIC INFORMATION
3. TO PRESERVE THE BALANCE OF INTERESTS
   3.1 Not to be involved in any Conflict of Interest situation
   3.2 To Exercise the Tasks and Authorities Correctly
   3.3 To Utilize the Corporate Resources Correctly
   3.4 To Establish Proper Relationships with our Stakeholders
   3.5 To pay due care and attention in Relationships with the Media
3.6 To represent the company properly
4. TO CREATE A MODERN AND FAIR WORKING ENVIRONMENT
5. GIFT GIVING AND ACCEPTING PRINCIPLES

- Our Ethical Management Code includes all members of management and all employees as well as the members of the Board of Directors of the company. All of our managers are responsible for ensuring compliance with business ethics principles and policies. The Ethics Board is established by our Chairman of the Board in order to ensure proper functioning of the Business Ethics Procedure. The problems faced by employees regarding the ethical principles in their daily business life and the notifications and complaints related with ethics that are reported by the employees, suppliers and the customers are discussed in our Ethics Board. The decisions taken by our Ethics Board upon considering the Business Ethics Principles and Policies that will constitute the basis in the related activities as well as the related laws, societal values and the corporate values are directly reported by the board to our Chairman of the Board of Directors. The decisions are then applied and executed after approval by our Chairman of the Board of Directors.
SECTION II

Our Principles
Our commitments as an extension of our understanding of ethical management:

In all of our relations with our stakeholders including particularly the persons and entities for which we provide services, we act with an approach and attitude complying with the general moral principles and laws, respecting the people, abiding by the honesty and integrity rules and avoiding any conflicts of interest in order to protect, preserve and enhance our reputation and the trust and respect shown to Bilim Pharmaceuticals.

Integrity or being “honest and true”, the topmost principle among Bilim Pharmaceuticals’ business ethics principles is adhered by following the rules listed below:

• We carry out all of our activities and transactions in accordance with the laws of the Republic of Turkey and the rules of the international laws and we provide accurate, complete and comprehensible information to the legal regulatory authorities and institutions in a timely fashion.
• While we carry out all of our activities and transactions, we treat equally any public entity and institution, administrative organization, non-governmental organization and political party and we fulfill our obligations with the awareness of this responsibility.
• None of the transactions and arrangements can be configured to bypass the internal and external audit system of Bilim Pharmaceuticals. No record is falsified for any purpose.
• We do not take advantage of customers’ weaknesses; we do not provide inaccurate, incomplete or misleading information about any issue as may be requested by the customers.
• We abide by the corporate policies, regulations and procedures.
• We plan and conduct all of our activities in accordance with our vision and mission.
• We bear in our minds our values and our business ethics principles when we take decision and conduct our activities.

COMPLIANCE PROGRAMME

Our business processing models remind us our responsibility to act in accordance with the business ethics rules and policies without deviating from integrity and honesty. Transacting business and taking decisions without pushing the limits of integrity and honesty is the common responsibility shared by all of our employees.

The Compliance Programme was developed, structured and put into effect by Bilim Pharmaceuticals’ Board of Directors in order to help and assist our employees and to support the correct behaviours and attitudes in compliance with laws, our EFQM and Reputation Management Models, and our Business Ethics principles and guidelines and to serve as a guide in case of any doubt. This Compliance Programme has been prepared to help us in relation with any issues, i.e. when we consider that the information that we obtain from all communication media including our immediate supervisors and managers is insufficient, or when we think that there is a discrepancy between the plans and the actual activities performed at Bilim Pharmaceuticals or when we are uncertain in such cases, when we observe any deviation from any policy/process; the Compliance programme and it specifies the persons to be contacted and the methods to be used for such contacts and how any related notifications can be made.

Compliance Board

Our Compliance Board is comprised of a chairman and four members appointed by the Chairman of the Board of Directors of Bilim Pharmaceuticals. Our Compliance Board is responsible towards and directly reports to the Chairman of the Board of Bilim Pharmaceuticals.

Our Compliance Board is the ultimate body responsible for ensuring that the company and all of its employees fulfill completely and accurately the corporate responsibilities arising from the laws and regulations. The Chairman of the Compliance Board supervises and ensures complete and accurate implementation of the models, rules and principles specified within our Principles during the studies and activities conducted in faithful compliance with our corporate values.

Our Compliance Board reviews any potential suspected or existing risks (related wit tangible, financial, environmental, societal, product quality, service quality issues, etc.) and any applications for negligence in relation with the issues specified in our Principles that may pose a risk for the company, employees or the public order and may, if required, receive support from the related specialists. In each case, our Compliance Board’s main tasks include, inter alia, compliance with Bilim Pharmaceuticals’ values, strengthening the corporate culture in order to fulfill the objective of integrity, “being honest and true”, one of our ethical principles, ensuring provision of related trainings and management of communication activities.

Notifications to the Compliance Board

Our employees may apply to the Compliance Board verbally or in writing; however, written applications are preferred for providing feedback to the notifying employee and/or for complete evaluation of the subject matter of application. For questions and notifications to the Compliance Board, applications may be made using Bilim portal, Bilim Pharmaceuticals’ internet site (www.bilimilac.com.tr), the board’s e-mail address (uyum@bilimilac.com), the telephone number of the Chairman of the Compliance Board (0212-365 15 16) and the mail address: (Bilim İlaç Maslak Mahallesi Sümer Sokak No.4 34398 Şişli İstanbul).
JOB SECURITY AND CONFIDENTIALITY OF THE APPLICANTS APPLYING TO THE COMPLIANCE BOARD

Job security is provided for each of our employees applying to the Compliance Board of Bilim Pharmaceuticals; and the related personal information is kept confidential. When legally required, such information is shared only with the public authorities while respecting the privacy.

TRANSPARENCY, OUR OPEN DOOR POLICY

Transparency at Bilim Pharmaceuticals means a mutually open, transparent and trust-based business relationship established with all stakeholders. With this approach, the clarity expectations of all of our stakeholders are met; and our economic, environmental and societal applications are shared with the public with the corporate social responsibility report.

Furthermore, there are several communication tools designed for enabling our employees to express themselves at the highest level and at safe and secure manner. With our “open door meetings” application that we have specifically developed, our employees are allowed to make face-to-face interviews with all of our top level managers in relation to any issues that they are willing to share. In addition, there is a separate telephone and e-mail line that can be used by our employees to share their comments, concerns or any information that they want to share in relation to ethical applications and practices. Apart from the conditions described above, our employees can also share their problems or thoughts with the Human Resources or all of our managers under the structure of our company in privacy and will be treated based on a solution-oriented approach.

ATTENTION!: If an activity, action or decision will result in “seriously consequences”, you are expected to notify it to the Compliance Board. Ask yourself the following questions in order to decide whether an activity, action or decision can result in serious consequences.

- Is the arising action contrary to the laws, our Business Ethics rules and policies, and the Line of Bilim Pharmaceuticals?
- Is it a deliberate error, or a systematic error? Does the action involve any manager? Does the action pose any hazard or health or security risks for the company or the public?
- What are the possible consequences? If you cannot decide on whether the incident is serious or not, please inform the Compliance Board.

OUR RESPONSIBILITIES AS EMPLOYEES

As the employees, we know and act with the awareness of our responsibilities to ourselves, our corporation and all of our stakeholders. In order to fulfill our responsibilities arising from the laws, we carry out all of our activities in accordance with the laws, regulations and the other statutory rules applicable in the Republic of Turkey as well as the rules and provisions of laws that are applicable on an international basis.

We pay attention to our responsibilities towards our customers and consider customer satisfaction as one of our most important objectives.

We act with the awareness of our responsibilities towards our shareholders and we target to create continuous and sustainable value.

We take care to fulfill our responsibilities towards our suppliers and collaborations, act in accordance with win-win principle, and pay attention to protect the confidential information of all stakeholders collaborated. Aware of our responsibilities towards our competitors, we do not get involved in any collaborations or partnerships which may lead to unfair competition. We overrate our responsibilities towards society, environment and humanity; and we try to contribute to the society through the awareness of good citizenship, and to act in a sensitive manner by pioneering in all societal issues.

We evaluate the environmental dimensions of all our activities and take precautions that will protect and improve the environment.

As the employees, we act with the awareness of our responsibility to represent Bilim Pharmaceuticals, and fulfill the tasks assigned to us for protecting the corporate reputation and brand of Bilim Pharmaceuticals. We abstain from any behaviours or statements that can risk or delegitimize Bilim Pharmaceuticals. We listen to the remarks and opinions expressed for Bilim Pharmaceuticals in any environments where we represent our corporation and notify them to the competent authorities as soon as possible.

We act knowing that being honest and true, protecting the confidentiality of any information and avoiding conflicts of interests are considered among our primary responsibilities.

Question: I think that some decisions recently taken by my manager are beyond our Principles although they are not different from our competitors practices. I have expressed this to her; but she did not take it seriously. What should I do?

Answer: Read once again the “seriously consequences” box given above. If your suspicions persist, contact the Ethics Board or the Compliance Board.
PHARMACEUTICALS INDUSTRY AND OUR MARKET RELATIONS

Our Commitments:

We will compete in the market by displaying proper ethical and legal behaviors and attitudes, showing respect to people, complying with the rules of integrity and honesty, and avoiding any conflicts of interest in order to protect and maximize our reputation and the trust and respect to Bilim Pharmaceuticals in all of our relations with all our stakeholders, including particularly the persons and entities that we serve.

In order to completely fulfill our responsibilities towards our customers, competitors and stakeholders;

- We will act in accordance with all health-related laws and regulations of the Republic of Turkey and the regulations of the industrial occupational associations which we are a member of.
- We will pay attention to the requirements and satisfaction of our customers in order to maintain an excellent service level. We consider maximization of the Customer Satisfaction as one of our primary business objectives.
- We adopt an approach trying to reply to the requirements, requests and complaints of the customers resulting from the services or products as soon as possible and in the most right manner possible in accordance with the legal procedures and regulations by balancing the stakeholders' expectations in our activities and to find proactive solutions in relation thereof.
- We pay due care and attention to preserve any confidential information of all our stakeholders that we collaborate.
- We monitor and follow up our products in respect of safety, quality, and performance.
- We establish proper ethical and bona fide relationships with the governmental authorities and business partners.
- We comply with all antitrust and competition laws.
- We collect any business information in accordance with the legislation.
- We comply with the customs laws and anti-boycott laws.
- We do not make any illegal payments or solicit any improper gifts or hospitality to the governmental authorities or business partners or accept such solicitations.

HEALTH LEGISLATION : LAWS AND REGULATIONS

Bilim Pharmaceuticals operates in a private sector in which the end user of the products, the persons and/or institution deciding on the product to be administered and the person paying for the cost of the product administered are different from each other. By its nature, this sector is subject to a series of laws and regulations for the following purposes:

- To prevent any possible adverse impacts on any treatment-related scientific and rational decisions due to any reason,
- To protect the patients and health institutions,
- To increase the service quality,
- To maintain the burden of health expenditures on the government at reasonable levels,
- To eliminate any potential cases of abuse.

In order to completely support the achievement of the aforesaid objectives, we, as Bilim Pharmaceuticals, carry out all our activities in accordance with the laws, regulations and the other legal rules currently in effect in the Republic of Turkey and the provisions of laws that are applicable on an international basis. We conduct and manage our relationships with the Agencies and Authorities regulating, executing and auditing such laws and regulations in compliance with such rules and on the basis of the principles of honesty and consistency. For more detailed information about the Promotion Regulation and the Healthcare Practices Directive of the Ministry of Health, and the Promotion Regulations of the Pharmaceuticals Industry Employers Union that are considered among Bilim Pharmaceuticals resources in creating the industry and market-oriented policies, please refer to the web addresses of www.saglikbakanligi.gov.tr and www.ies.org.tr.

ETHICAL PROMOTION ACTIVITIES AND RELATIONS WITH HEALTHCARE PROFESSIONALS

Our promotional activities and our relations with healthcare professionals are the factors that most closely affect our corporate reputation and prestige. There are laws and regulations regulating our relations with healthcare professionals including particularly physicians, nurses and pharmacists and covering all our activities, including particularly the promotion, training and business activities and we strictly abide by such laws and regulations. For management of such relationships, we refer to and apply the following rules and regulations:

- Promotion Regulation of the Ministry of Health
- Promotion Guideline of the Pharmaceuticals Industry Employers Union (IEIS)
- Bilim Pharmaceuticals Ethical Management Guideline

We expect from all of our employees to completely understand and internalize such rules and regulations.

In the materials, messages and applications that we use in our promotional activities, we attach utmost importance to the following issues:

- All information contained should be accurate. Such information should not be misleading the persons and entities to whom such information is forwarded.
- All information and data that we use should be based on scientific evidences.
- They should be in compliance with Bilim Pharmaceuticals’ legal quality standards including EFQM.

Our personnel working in the departments related with marketing, promotion, medical and statutory legislation know such laws and regulations by heart and implement and execute them and monitor such implementation in a determined manner under any circumstances.
QUALITY OF OUR PRODUCTS

Monitoring the Safety, Performance and Quality of our Products is one of our primary tasks. Patient safety is highly prioritized under the scope of this policy. We do not put our signature under or perform any acts or actions that we cannot be accountable for under the scope of our Bilim Pharmaceuticals sustainability policy.

We assess the level of safety and efficacy and ease of administration of our products that we offer for use by the end consumers upon completion of the related registration process and we make the necessary improvements if and when required. We closely follow up any publications and evaluations containing scientific developments related with our products and try to provide currently updated, balanced and high-quality information about the risks and benefits of our products for healthcare professionals, public authorities, patients and operators.

We do not limit the safety profile of our products only with the information collected in the pre-registration process; we also monitor our products after marketing and make the required improvements, and developments and provide any current information. We try to acquire comprehensive information about our products as much as possible. To this effect, Bilim Pharmaceuticals’ employees, that can readily be contacted by our stakeholders such as patients and healthcare professionals, etc. employees including particularly Bilim Medical Representatives, office staff, security and switchboard operators, (starting from their orientation periods) are instructed by our specialized trainers about the procedure required to be followed when they receive any notification about the safety, reliability, quality, adverse effects and performance of our products. As required by both our policies and the related laws and regulations, we monitor and review all notifications related with the quality, safety, and efficacy of our products and notify them to the related competent authorities if and when required.

Any Bilim ilaq employee receiving such a notice forwards it to the related departments and responsible persons via telephone or e-mail within 24 hours. The departments responsible for product safety and/or quality contact with the notifying person if required and receive detailed information about the issue and initiate the related processes.

Upon evaluation of any notifications related with product safety, we report, and, if required, apply to the related public authority for taking any additional measures in accordance with the applicable laws and regulations. We perform the required analyses and evaluations for any notifications related with product quality, provide related feedback and, if required, make any improvements upon receiving applicable consents.

We maintain our development efforts on a continuous basis through periodical reviews, stability studies, and improvement activities that we conduct to increase the safety and quality of our products.
DISCLOSURE OF PRODUCT-RELATED INFORMATION AND EXPERIENCES

As Bilim Pharmaceuticals, we periodically monitor and ensure preservation of the risk and benefit profiles of all our registered products in a careful manner.

To the extent permitted by applicable laws and regulations, we pay utmost attention for timely and complete disclosure of our product-related information to the users (and/or administrators), healthcare professionals, and public authorities.

We provide all related persons both in Turkey and in the countries to which our products are exported any information about the properties of our products such as use and handling, safety, contraindications, and special instructions for use (pregnancy, lactation period, etc.) and side effects, etc.

We provide such information by means of the following means and media in accordance with the related laws and regulations:

- Package contents (package insert or instructions for use);
- “Dear Healthcare Professionals” letters addressed to the Physicians, Pharmacists and the other healthcare professionals;
- Training and/or printed promotional materials;
- Presentations made by our agents such as Medical Representatives;
- Sharing of the related scientific publications (literature, congress posters, etc.);
- Reports presented to the public authorities (pharmacovigilance reports, stability results, etc.).

The information disclosed and shared as such should be consistent and non-misleading. Therefore, in case of any change in the currently available information, we complete the required legal processes as soon as possible and ensure maintenance and exchange of such information in a currently updated manner.

CONFIDENTIALITY OF PATIENT INFORMATION

We keep confidential any patient information obtained or forwarded to us during our activities. All our employees, our suppliers and the companies collaborating with Bilim Pharmaceuticals pay attention to ensure preservation, security and confidentiality of such information entrusted to us.

BRIBERY AND CORRUPTION

We conduct all our activities in accordance with the laws, regulations and the provisions of any other national and international legislation. Similarly, we also maintain our relationships with the agencies and authorities regulating, executing and auditing such laws and legislation in accordance with such rules and in an accurate and consistent manner. Bilim Pharmaceuticals strictly prohibits solicitation of any gift or making any payment to any person for the purpose of taking advantage in the course of purchase or sales of goods and services or acquiring undue interests for our company under favour of public authorities.

We pay separate attention to the bribe and corruption issues during our activities.

It is essential not to make any payments or to solicit any gifts to or to provide any services for the public officers which are aimed at affecting their decisions or which may be recognized as such.

Direct or indirect involvement of all our employees, consultants, agents and other representatives in commercial bribery is strictly prohibited.

---

**Question:** A patient using our product wants to notify a side effect that she has experienced to us. But she does not want to be identified in the records. What should I do?

**Answer:** The patients’ side effects should be notified to the treating physician or pharmacist, not to the companies; as a corporation, we should receive such information from the healthcare professionals. The patient information is kept by physicians using legally specified encoding. The treating physician can decide whether the effect expressed by the patient is a side effect or a sign of disease. Explain the situation to the patient; and direct the patient to his/her physician, or if not possible, to the pharmacist from whom the drug has been purchased. Do not forget to explain that all side effects considered to have emerged in relation to use of our products should absolutely be reviewed by the related physician or pharmacist under the scope of pharmacovigilance.

**Question:** I visit different customers in different regions as required by my job. In some of my customer visits, I see that the concept of “normal business practices” may be interpreted differently by the people. A behaviour which can be perceived as bribery for one of my clients can be a traditional manner of transacting business for another. How can I differentiate them?

**Answer:** You should not take advantage of or make any payment to a public officer, healthcare professional or to any other person with the purpose of acquiring unfair business advantage on behalf of Bilim Pharmaceuticals. You should comply with all related laws, regulations and procedures within the framework of Bilim Pharmaceuticals’ Ethical Management approach. If you need help about any issue, you can contact your immediate managers in accordance with our open door systematics. If you need further detailed information, you can consult with the Ethical Board or our Legal Division under the structure of our company.
COMPETITION and ANTI-TRUST LAWS

Bilim Pharmaceuticals’ employees lead the sector by acting in compliance with competition-related principles and rules specified in the laws of the Republic of Turkey and of the countries where our Representation Offices are located. We act properly to protect Bilim Pharmaceuticals’ corporate reputation in any kind of business relationships.

We do not share with our customers any information related to our competitors lacking any legal and/or scientific basis. We do not try to make a deal, reach to a mutual agreement or even try to negotiate with any of our competitors in relation to the following issues:

- Prices and discounts
- Terms of sales
- Market shares
- Distribution procedures and channels
- Tenders or tendering intents
- Selection of customers and customer classes, customer classification, and customer rejection or disengagement criteria
- Sales territories and markets
- Mutual exchange of competitive data
- Any other issue which may prevent performance of the corporate activities with full liberty or jeopardize its independence

We cooperate and provide support during any internal and external audit activities performed for monitoring the compliance of the corporate activities with the legislation and in-house regulations.

COMMERCIAL ISSUES

We need to collect and use some public information while managing our business in our industry. Substantial public information about the other companies and their products and services can be obtained through different means such as web sites, articles, bulletins, brochures, public disclosures, etc. However, any commercial information about the other companies should be collected and used only in accordance with the laws and ethical rules. The laws and the obligations of confidentiality should not be violated.

We neither use, nor encourage others to use any illegal or unethical methods such as collection of information through misrepresentation, deception, theft, espionage, or bribery.

If any third person is assigned for collection of any commercial information, it is our responsibility to ensure that such third person collects any information in compliance with the laws and ethics and is informed about our policies related with such issues.

There may be some laws restricting or prohibiting transaction of any business in some countries with which we perform import or export operations. Some countries restrict or prohibit the transactions related with specific products and technologies. Our employees responsible for and conducting international operations on behalf of Bilim Pharmaceuticals Inc. should know the related laws and how they are implemented in such countries.

If we need any assistance about such issues, we absolutely contact with our immediate supervisors and our Legal division.

Question: A top level manager to whom we have proposed to work for us while he was recently employed in another company said during his recruitment process that he had the results of a research conducted by the competitor company and he was ready to share them with us. In your opinion, what should I do?

Answer: If the information proposed for sharing by the candidate can be purchased from the related research company, we access to such information by paying its cost. Sharing any information that can be considered as trade secret is contrary to both the laws and our corporate ethical rules. Terminate the recruitment process of the related candidate that can put you and our company on the spot.
RELATIONS WITH OUR SHAREHOLDERS

Our Commitments

We plan and manage all our activities with an ethical and sustainability approach and in a proper manner to ensure a significant and satisfactory growth and profitability for all our stakeholders.

We perform all our business activities and the performances of our employees at any level required for maximizing the corporate value as a result of their extremely loyal, creative and innovative working approach.

All our employees meet the shareholders’ expectations by pursuing efficiency, creating added value for the company and the society, and utilizing the corporate resources in the most effective manner in any works that they perform.

Aware of the fact that the company’s and the shareholders’ interests and acquirements are in line with the interests of the employees, we pay due care and attention to ensure that:

- All statutory records truly reflect the actual conditions and the essence of the related activities,
- Any environments that may lead to origination or fostering of any conflicts of interests are prevented,
- Governance principles are completely implemented in all audit and financial reporting,
- Action are taken in relation to accessibility, confidentiality and respectability of information in order to ensure security of information,
- All intangible rights are protected,
- Any environments that can lead to onset of conflicts of interests are avoided,
- Any kind of information, records, and documents are used ethically and for their intended purposes.

AUDIT REPORTS

Accounting Records and Auditing

Our accounting records are kept in accordance with the generally accepted accounting principles, accounting legislation and uniform chart of accounts and it is ensured that all records are true and complete.

Besides the statutory accounting inspections, our company is audited by an international audit company in respect of tax-related issues and processes and the related audit reports are prepared. Such audits include Full Certification Audit, Audit by IFRS Reporting Standards and Evaluation of Internal Controls.

The Business Process Controls Assessment conducted for understanding the core business processes of our company which substantially affect the financial statements, determining the current business risks related with such processes and the risks on the related financial statements and evaluation of controls designed or currently implemented against such risks is comprised of inspection and audit activities.

It is mandatory that the Statutory Books should be published within given statutory periods. Otherwise, we can incur irregularities or fines or sanctions for rejection of tax reductions granted for value added taxes assumed.

We keep the required documentation (accounting receipts and valuable papers) and statutory books for five years as required by the Tax Procedure Law or for ten years as required by the Turkish Commercial Code starting from the year following the related current year. In addition, year-end closing transactions should also be performed as required by the Turkish Commercial Code due to their evidential value for any litigation process. The statutory books are issued within statutory periods and General ledger year-end closing entry is certified in our Company. The responsible person and our related department personnel who are responsible for completion of such transactions are liable to follow up the current legislation and to conduct the audits and inspections of our company in accordance with the local legislation and the laws of the other countries collaborated with.

Question: Some laws stipulate for storage of documents for 5 years while some others stipulate for longer storage periods. Storage of documents is a costly and difficult process. In my opinion, storage of documents for five years in accordance with the Tax Procedure Law seems to be a reasonable legal procedure utilizing the resources more accurately. What do you think?

Answer: We should act in compliance with the Tax Procedure Law for some transactions and with the Turkish Commercial Code for some other transactions. If you hesitate, ask to the responsible authorities of the Accounting Department or to the Compliance Board. And, as criterion, adopt the longer period specified in the laws until you receive an answer to your questions. Don’t forget that some documents (e.g., licenses, incorporation documents, title deeds, etc.) should be stored as long as our company survives!

Records and Information Management

We assure that leaders of our company at any rank and level receive instantaneous, consistent and adequate information allowing them to take effective and timely decisions under the scope of our information technologies and security policy. We convert our corporate data into know-how and knowledge by means of computer-assisted or manual systems, and share such data with our employees authorized on the basis of information security for data exchange purposes. We store and backup any information generated within the company and manage the documents that we archive. During data processing, transmission and storage, we prioritize privacy, integrity and accessibility and take maximum measures against any potential data loss by developing contingency and disaster recovery plans.

The rules required to be followed by all our employees in order to ensure management and security of any kind of information pertaining to our Company are secured with detailed procedures and instructions provided in Bilim Portal.

We expect from all our employees to know the rules specifying the information generated in the company which are required to be collected and the department which is required to collect such information, the electronic media and the time period expressed in years for storage of such information and the related disposal and destruction procedures.
CONFIDENTIALITY AND COMPANY-SPECIFIC INFORMATION

Use and Handling of Corporate Computers and Resources

We provide and protect any kind of hardware, network and software requirements required by all employees for access to any information needed. Every employee has an e-mail address and a user identity; they can access to their personal information and payrolls via the information access network (e.g. via Bilim Portal integrated with SAP) operated by taking maximum security precautions. Access to any application software in our systems is allowed in accordance with the authorization procedure approved by the Quality Directorate.

Bilim Portal provides our procedures and instructions for proper use of the high-tech tools, devices and security software arranged to ensure the security and proper use of multiple systems, application software, corporate network, computers and all Information Technologies equipment currently used in our company. We should be aware of the fact that despite maximum security actions taken, improper use or misuse of any information or any hardware or equipment allowing us to access to such information may lead to pecuniary or non-pecuniary losses or damages that may be incurred by us or by our company. For security purposes:

- The user IDs and passwords that we have given to our employees for access to different systems and application software should not be shared with others and the passwords should be periodically changed by the users.
- Any unlicensed or prohibited computer software without a specific origin should not be installed or replicated on the computers of the company. The responsibility for any unauthorized program found to cause security violation is on the account of the related user.
- Any information generated within the company should not be moved outside under any circumstances without the prior consent of the related department managers.
- Anti-virus and/or SPAM protection software and security encryptions installed in your computers by Bilim ITM should not be disabled under any circumstances.
- Corporate reputation should be considered in any communications to be forwarded from the e-mail addresses with @BILIMILAC.com or @BILIMPHARMA.com extensions provided by the Company for its employees. It should be borne in mind that all incoming and outgoing messages received via Internet are recorded and stored in accordance with our legislation.

**Question: Can I use my personal computer or monitor in the company?**

**Answer:** Our company provides standard computers the technology of which is reviewed every year for all of its employees (shared computers are provided for the blue-collar employees assigned in production units). As required by our rules, personal computers are not permitted.

**Question: Is there any problem if I send personal messages unrelated with the company to my friends from the e-mail address given to me by the company?**

**Answer:** Since the employees’ access to Internet is provided by the companies, the related content responsibility is on the account of the companies. The communications in such environments can be monitored if required by laws. Privacy of the messages sent from your corporate e-mail address cannot be ensured. Making unfounded statements and/or gossiping about any person or entity by using the Social Media is prohibited. The competitor company can sue you (and our company) for smearing its business reputation since the related news are distributed from your address even if the news received via e-mail are true and correct. Do not be involved in distribution of such type of messages.
Company-Specific Confidential Information

Confidential and company-specific information includes business plans, production, control, product development and technology, marketing and pricing data, customer data, plans related with new business areas and movements, any information about the employee personal rights and any information covered under the scope of “non-disclosure agreements” concluded with any third parties; but excludes any information disclosed to the public by the corporate spokesperson.

Products, services, ideas and thoughts that we produce every day are the assets of our company.

There are laws, regulations and procedures in place helping us to protect such assets. We also bear in mind that any confidential and proprietary information entrusted to Bilim Pharmaceuticals by any third persons should also be preserved. The obligation to comply with confidentiality rules prevails even after departure from our company for any reason. Confidential and proprietary information is shared only with the authorized related persons within the limits of their authorizations.

We should pay attention to the following requirements in order to protect our confidential and proprietary information:

- We are careful when storing and sending any information via telephone, fax, telex, e-mail or other electronic methods. We are alert against any unofficial telephone calls or e-mail requests received from the persons not working in our company.
- We do not send any confidential and proprietary information to the e-mail accounts not pertaining to our Company.
- We cease and forfeit our right of access to any sensitive information which we do not need any longer upon informing and receiving the consent of our immediate manager.
- We do not mention about any confidential and proprietary information pertaining to our company in public areas.
- We always bear in mind that confidential information should not be disclosed to any external person without receiving a written non-disclosure agreement or the required prior consent under any circumstances. If we need to share some information as required by our jobs, we notify the situation to our manager to receive prior remarks and consent.

Question: I make 3-dimensional animations in electronic media as a hobby outside the normal working hours and I intend to use them also in in-house trainings. There are highly advanced and quite expensive programs that can be used for them. I want to install into the corporate computer a copy of the program used by my brother in their workplace that he has also shared with me and work more productively. Is there a problem with it?

Answer: Installation into the corporate computers of any programs for which the copyrights are not purchased by Bilim Pharmaceuticals will cause infliction of heavy legal punishments upon both you and your company. Enjoy your hobby when you visit your brother’s company. If you can prove that the program will be useful for our company, our company will purchase it and install into your computer!

Patents, Trademarks and Copyrights

Every individual employee is responsible to protect and defend intellectual property rights.

We support for generation of, and protect and defend any kind of important business-related intellectual property rights pertaining to Bilim Pharmaceuticals. We use the patents, trademarks and copyrights with a sense of responsibility.

While protecting Bilim Pharmaceuticals’ intellectual property rights, we also respect the legal intellectual property rights of the other persons and entities at the same extent. Unauthorized use of the intellectual property rights pertaining to other companies knowingly or unknowingly may expose us and the company to litigation and claims for damages. Unauthorized reproduction of any copyrighted works (by means of photocopy, electronic methods, etc.) may lead to infliction of a fine or penalty of imprisonment upon both our company and the related person.

Privacy of Personal Information

Our company pays high attention for confidentiality of personal data and holds all our employees accountable for this requirement.

Our employees, the applicants for a job, investigators, healthcare professionals, our customer groups, our suppliers, our subcontractors and our numerous stakeholders all around the world share their personal information with our company.

Privacy and protection of such information is both a legal requirement and an expression of our dedication to our values as Bilim Pharmaceuticals Inc. Therefore, our employees are strictly prohibited from disclosing such information to others or exerting pressure on other employees for disclosure of such information.

You should pay attention to the following requirements to ensure privacy and protection of any personal information:

- Collect any personal information as required by your job only by legal means and for proper and business purposes. Keep such information only until achievement of such intended purposes and fulfillment of the related legal obligations. After completion of the related work, destroy such information upon receiving the prior consent of your immediate manager in accordance with the corporate procedures.
- Take any required measures to prevent unauthorized access by any third persons while collecting, entering into system, archiving and, if required, forwarding any personal information.
- Share such information only with the persons that legally need to know and that can properly protect such information.
Insider Trading

If you access or become obliged to access or any material information that is not yet publicly disclosed while doing your job, i.e. if you acquire any "insider information", you should not be involved in trading of any securities based on such information.

As required by our corporate policies, you must not use or disclose such insider information that you acquire in the company willingly or unwillingly. You cannot let any other person use such information, either. Violation of the laws related with securities may lead to very serious consequences.

Violation of such laws may result in infliction of heavy fines or penalties of imprisonment upon the related companies and persons.

AVOIDING CONFLICT OF INTEREST

As the employees of Bilim Pharmaceuticals, we avoid any conflict of interest.

We do not use or take advantage of the name and facilities of the company, or the authorities and opportunities granted to us in relation to our position in the company for our personal, familial, social, material or political interests.

We abstain from using the name and power of Bilim Pharmaceuticals for acquiring personal benefits.

We do not commit any acts or display any attitudes against the ethics, laws and the corporate discipline.

We always bear in mind that, even in case of absence of any actual conflict of interest, creation of such an impression might impair our and our company's reputation.

Question: My brother is opening a new workplace and asked me to support him to find sales representative who may be willing to work in this region. Since I work in the human resources department, I intend to forward to him the curriculum vitae of the candidates applying to our company, but failing from the preliminary assessments made by our company. This will not create any conflicts of interest with our company and can be considered as a social service for job seekers as well. How about it?

Answer: Not only the information related with the employees, but also the information shared by the persons applying for a job is confidential information. Therefore, sharing such information is not possible as specified in the related laws and in our corporate policy.

Question: I learned by accident from the correspondences that one of the big companies that our company works with will make an important investment in the near future. It is obvious that the publicly traded share certificates will come into value significantly. Is there any problem if I right now start to collect such share certificates in the name of my spouse, to avoid a conflict of interest?

Answer: If the related information is an information not yet adequately disclosed to the public, it is considered as non-public information. Accordingly, non-public information cannot be disclosed to any person or shared with others excluding the persons authorized by the company. Such information has been shared under the scope of the non-disclosure agreements concluded with our company.

OUR EMPLOYEES

Our Commitments

We are proud of the strong loyalty of our employees and the success achieved with such loyalty. In accordance with the importance we give to Human Rights securing our structure based on the principles of respect, trust and loyalty, we commit/warrant that:

- We will not make any discrimination among our employees,
- We will provide equal opportunities between men and women,
- We will develop the applications that will meet the requirements of our female employees that are mothers,
- We will support the personal development of our employees,
- We will recognize the contributions and skills of our employees and reward them under the scope of a fair system,
- We will provide and apply a fair salary and fringe benefits system for all our employees,
- Working overtime outside the normal working hours is subject to prior consent and willingness of our employees; and we will pay overtime wages for such works in accordance with the laws,
- We will establish a balance between the business and private lives of our employees,
- We are determined to establish stronger relationships with our employees at any level and we respect our employees' freedom of communication,
- We will provide a healthy and safe working environment.
OUR EQUAL OPPORTUNITY POLICY

We neither make any discrimination among our employees or among the applicants applying for a job, nor tolerate any kind of abuse. Our employees are not discriminated by gender, sexual orientation, language, race, ethnical origin, political thinking, belief, religion, religious sect, age, physical disability or any similar grounds. Furthermore, we constantly follow the principle of equal opportunity for men and women among all our stakeholders and we offer equal wage and career opportunities to our employees.

Working overtime outside the normal working hours is subject to prior consent and willingness of our employees; such overtime works are paid duly in accordance with the laws.

We have identified the requirements in order to establish a balance between the business and private lives of our employees and considering both our employees and their families as an integral part of our success, we always support them by our various applications.

DISCRIMINATION and ABUSE

We ensure that the people with different beliefs, opinions and thoughts can work together in harmony by creating a positive and coordinated environment supporting cooperation and preventing any environment that may lead to conflicts at Bilim Pharmaceuticals.

Violation of the employees’ right of privacy in the workplace or in any place in which they may work as required by their jobs in any manner through physical or sexual abuse and/or mobbing is contrary to the laws and the ethical rules and this offence is not tolerated at Bilim Pharmaceuticals under any circumstances.

Notification of any cases of discrimination and abuse

In case of exposure to any kind of discrimination or physical or sexual abuse or mobbing or if it is noticed that any other employee is exposed to discrimination or abuse, the situation may be notified to the immediate supervisor, Human Resources, or directly to the General Manager, Ethical Board or Compliance Board. Such notifications may be made verbally or in writing under the scope of the Open Door Systematics. All notifications shall be kept strictly confidential.

USE OF ALCOHOL AND NARCOTIC DRUGS

For the purpose of ensuring a healthy and safe workplace environment;

- We know that our employees should not come to work under the influence of alcohol, drugs or narcotics considered to impair safe and conscious working.
- If we become aware of such conditions, it is our duty to immediately notify such situations to the management.

OUR COMMUNITY AND PUBLIC RELATIONS

Our Commitments

To serve for sustainability with the awareness of our social, environmental and economic impacts and our responsibilities towards our stakeholders and with an ethical, transparent and accountable corporate management approach is an integral part of our business approach and our corporate culture.

We consider health, human happiness, social development and environmental protection among our principal issues of high priority for a livable world beyond ensuring full compliance with any kind of legal liabilities; and we develop applications that can set good examples for all related institutions in relation to these issues.

We attach priority to the participation and development of our stakeholders during planning and execution of all applications. Based on these fundamental principles and during our activities:

- We carry out business activities without compromising ethical values.
- We show respect to human rights; object to any kind of discrimination, and encourage equal opportunity.
- We are aware of our environmental impacts and we prioritize protection of ecological environment.
- We pursue for the health and safety of all our stakeholders during performance of our activities.
- We fulfill our responsibility to pursue for social development and to meet the requirements of the future generations by our social investments in the fields of health, culture-art, education and environment.
- We develop non-governmental partnerships in our collaborations; attach value to their expertise; and support their activities.
- We encourage and promote our employees and all of our other stakeholders to take active roles and to participate in the settlement of social issues.

We assume responsibility for a sustainable future. Under the leadership of our Sustainability Board, we conduct activities supporting the participation of our stakeholders in order to fulfill our environmental and social responsibilities under the structure of our company.

There are various applications in place that we implement for enabling our employees to become the advocates of sustainability. We provide sustainability training for all our employees and encourage and support both creation of a collective awareness in our company and generalization of this awareness in their environments by fulfilling their own personal responsibilities. We also carry out activities oriented to create the sense of sustainability not only in our employees, but also in our suppliers and customers.

Under the scope of Bilim Pharmaceuticals’ reputation management model; we make any efforts to fulfill our corporate responsibilities in order to ensure the sustainability of the company with our values of respect for future generations and ethical management.

With our sustainability activities, we have aimed as a target to lead both our own industry and the Turkish business world.
CONTRIBUTIONS TO THE SOCIETY

Considering that the awareness about the rational use of pharmaceutical products is not at the desired level in the country, as Bilim Pharmaceuticals, we prioritize, above all, raising the awareness of the patients and the patients’ relatives. We pay attention to realize it within the framework of the legal restrictions and by creating platforms gathering together all our stakeholders.

To this effect, we have put into implementation important societal investment projects.

Our Major Community Investment Projects

- **Alzheimer Call Center:** Alzheimer is a disease changing the life of an entire family together with that of the patient. It has been aimed to support the patients’ relatives during this difficult process reaching to the dimensions of an emotional trauma and to help the patient relatives to overcome this process as easy as possible without compromising the quality of life.
- **Unmask the Truth:** Aimed to introduce schizophrenia to the public, to support elimination of the pressure exerted on and the misperception about such patients and to show what the patients with schizophrenia can do when they are given an opportunity.
- **Thinking Songs:** Aimed to outgrow the prejudices in the community raised against the individuals with any mental diseases, and particularly with schizophrenia.
- **Global climate change and its effects on respiratory diseases:** Aimed at raising the awareness of the physicians about the “Impacts of the Global Climate Change on Respiratory System Diseases”.
- **Diabetes Screening:** Aimed to inform the patients about the possible issues that they can experience in their life in relation to their diseases since chronic diseases constitute the life-long prevailing medical conditions.

The Projects implemented by Bilim Pharmaceuticals' Community Volunteers:

- **Remove the Obstacles:** Aimed at ensuring higher participation of the disabled children in social life.

- **Bilim's Brothers & Sisters:** With this project deployed as an umbrella, it is aimed at ensuring personal developments of the primary school students attending the schools in need of such assistance and improving their educational environments and facilities.

  **Bilim's Brothers & Sisters at School:** aims to improve the educational environment and facilities in the primary schools.

  **Bilim's Brothers & Sisters, Curious Books and Creative Reading:** aims to improve the creativity and curiosity of the primary school students and to arouse the love of reading books among such children.

OUR VOLUNTEER PROJECTS

As Bilim Pharmaceuticals’ Community Volunteers comprising our employees, we aim as an objective to set a good example to the other companies by maintaining our leadership in this field and to ensure exchange of the knowledge gained in the private sector which we consider as quite important for Turkey with the community by spreading out and generalizing volunteerism.
**Bilim’s Brothers & Sisters, Teeth-Friends**; aims to get the primary school students to adopt the habit of brushing their teeth.

**Bilim’s Brothers & Sisters at the Theater**; aims to contribute in the social lives and personal developments of the primary school students with the children’s play staged. The play named as “Alaaddin’s Magic Lamp” (Alaaddin’ın Sihirli Lambası) is staged free of charge for the primary school students from 07 to 12 years of age. The volunteers aim to reach to 5,000 students by staging the play in the provinces of Samsun, Sivas, Tokat, Ordu, Çorum, Amasya, and Sinop.

- **My Career is in my Hands** is a 4-day congress comprising 10-12 different full-day trainings provided for contributing in the personal development and career development of the university students… Such trainings are provided by the professional volunteer trainers that provide instruction for the business world in Turkey. So far, these congresses have been organized at Erzurum Atatürk, Eskişehir Anadolu and Kayseri Erciyes universities.

- **Save Lives, an EU-supported project** … aimed to ensure that the required precautions are taken before any possible accidents and to raise the awareness about first-aid procedures applied after accidents.

- **Seeds to Saplings, Saplings to Trees**; aimed to arouse the love for nature among children.

**OUR SENSITIVITY TO ECOLOGICAL ENVIRONMENT**

We make any efforts to control and manage the natural environment and our workplace for a sustainable future. To this effect, we have developed the OHS&E (Occupational Health, Safety and Environment) policies, ISO 14001 Environment and OHSAS 18001 Occupational Health and Safety Management Systems, the Environmental and Occupational Health and Safety Manuals describing such systems and application-oriented procedures and instructions.

Since ensuring Occupational Health and Safety and protecting the environment is the common responsibility of everyone, we, the employees of Bilim Pharmaceuticals, are expected:

- To fulfill and comply with the requirements of the OHS&E management system and the laws and regulations,
- To make constant efforts for improvement of the OHS&E performance,
- To perform our activities in a safe and environmentally-conscious manner and to integrate the OHS&E factors with our workplace and our activities,
- To contribute in the general efforts endeavoured for protecting the natural environment and the workplace,
- To be open and transparent towards the employees in the workplace and the community outside the workplace and to strengthen the dialogue,
- To notify any nonconformities related with OHS&E using the CA Corrective Action Form;
- To notify any cases or incidents that we are suspicious of nonconformity and that we consider as areas for improvement to the OHS&E Specialist for discussion at the OHSB Occupational Health and Safety Board or at the EMB Environmental Management Board using the preventive feedback means such as risk of accident, hair’s breadth escape from accident, and case notifications, etc.,
- To notify the cases that we consider as a violation of OHS&E-related laws to the OHS&E specialist for discussion with the Workplace Legal Advisor.
OUR OHS&E RULES

All our employees receive orientation (compliance) training upon recruitment. We describe Bilim Pharmaceuticals’ OHS&E policies, management system, main risks and the employees’ liabilities under the scope of the compliance programme.

Furthermore, we provide regular training to all our employees within the framework of the annual training programme in relation to the OHS&E policies, management system, procedures, instructions and contingency management. The primary purpose of such trainings is to ensure compliance of the employees with the OHS&E rules.

We announce Bilim Pharmaceuticals’ Occupational Health, Safety and Environmental Policies to our employees through various channels. You can find the policies in the bulletins located in the common areas of the workplaces or access to such policies via Bilim Portal.

The outcomes related with Bilim Pharmaceuticals’ OHS&E approach, management style and applications are provided in the CRR Corporate Responsibility Report published at Bilim Portal.

Question: How can I know whether any nonconformity that I notice can be considered under the scope of violation of laws?

Answer: You may not know. One of the standard agenda items of the OHS&S and the EMB is the assessment and review of the current state of “compliance with legislation”. Nevertheless, notify any nonconformities that you possibly consider as a breach of laws to the OHS&E specialist by completing the preventive feedback form according to the subject matter of such nonconformity. The OHS&E Specialist constantly contacts with the Human Resources, Legal Advisor, and the Employer’s Representative and assistant. He/she will immediately initiate the assessment process upon such notice.

Question: How can I know whether our plant complies with the OHS&E legislation and policies?

Answer: Bilim Pharmaceuticals implements ISO 14001 Environmental and OHSAS 18001 Occupational Health and Safety management systems. In this context, both the certification company and the internal audit teams of Bilim Pharmaceuticals conduct regular inspections and audits and evaluate the current state of compliance with the standards. CA form is opened for any nonconformity identified and they are corrected or recovered until the targeted completion date specified in the related corrective action form.

PROTECTION OF VOLUNTEERS and SUBJECTS IN CLINICAL TRIALS

Since we, Bilim Pharmaceuticals, are a generic pharmaceutical manufacturer, our products should contain the same active drug substance and the same content and have the same pharmaceutical dosage form with the original product. Therefore, the primary method to prove that our products have equivalent efficacy to the original products is to conduct bioequivalence studies. During such bioavailability and bioequivalence studies to be conducted on healthy people, we, as Bilim Pharmaceuticals, comply with the Drug Researches Regulation, Medical Deontology Regulation, Declaration of Helsinki and its annexes and the related resolutions. The principle of avoiding unnecessary investigations on human subjects and unnecessary increase in the number of subjects to be used in bioavailability and bioequivalence studies has been defined in the Declaration of Helsinki.

According to the Declaration of Helsinki; “The right of the subjects participating in the bioequivalence studies to protect their integrity should always be respected. In each trial, on one hand, the subject’s private life should be taken into consideration as a precaution; and on the other hand, the impacts of the study on the subject’s physical and mental integrity and character should be minimized.” We take into account the international norms and standards as well as the ethical, statutory and regulatory norms and standards applicable in our country in relation to the bioequivalence studies involving healthy subjects. Before such studies, the prior approval is received from the ethical board and the other boards and the informed consents are obtained from the subjects as required by the Drug Researches Regulation. Any kinds of legal and financial responsibility related with such researches are on the account of the sponsor (Bilim Pharmaceuticals) and the contract research organization performing the related research (CRO). The criminal and legal liabilities arising from such research studies are subject to general provisions. Bioequivalence studies are conducted by internationally accredited organizations (CRO) in accordance with the GCP and GLP guidelines. As Bilim Pharmaceuticals, we ensure privacy and protection of any personal information related to the subjects participating in such studies.
MEDIA AND PUBLIC DISCLOSURE

We consider communication as the most important factor supporting our participative management approach. We perform regular and mutual data exchange with our stakeholders that we contact internally and externally based on our principles of honesty, transparency, ethics, clarity, sustainability and accountability.

We present our corporate vision, mission, values, policies and strategies to the attention of, firstly our employees, and then, the other stakeholders.

We aim at ensuring exchange of data accurately and based on the principles of clarity and confidence for all our stakeholders. We share our performance transparently with our corporate responsibility report in order to meet the key expectations of our stakeholders.

We establish communication with media and the public based on the principles of integrity, accuracy and clarity. We pay attention to ensure that the press and media obtain correct information at the source and in a timely fashion.

In this context, Bilim employees are not supposed to answer the questions received from the public and the media in order to prevent any misunderstanding and to ensure public disclosure of correct information in its entirety. When any information is requested from you, you should note down the name of the requesting person and immediately contact with and inform the Corporate Communications Management.

Question: One of the high circulation newspapers in Turkey called me and asked me to provide information about Bilim Pharmaceuticals in relation to the issues within the lines of my authority. Should I provide such information?

Answer: Communications with press and visual media are only conducted by the Corporate Communications Manager assigned by Bilim Pharmaceuticals’ Board of Directors. Our General Manager is our corporate spokesman at Bilim Pharmaceuticals. Any disclosures on behalf of Bilim Pharmaceuticals can only be made by the General Manager (or the person authorized by him in writing). If any information is requested from you, you should note down the name, contact address and telephone number of the person and entity asking for information and notify it immediately to the Corporate Communications Management or the General Manager.

STATUTORY INVESTIGATIONS AND REQUEST FOR INFORMATION

As Bilim Pharmaceuticals, we adopt, as our most fundamental approach, complete fulfillment of our responsibilities arising from laws under any circumstances by ensuring compliance with the ethical guidelines and principles. However, if and when required, we prepare any information and documents that are requested by the statutory agencies and institutions and submit them to the competent authorities. In such cases, our company is represented by our legal advisors. Similarly, if any public official contacts you and requests for information, you should also get into contact immediately with your manager, our legal advisor and the Compliance Board.

If you do not ask for support that may be required in any kind of statutory investigations to be carried out by the public officials, you and our company may be subject to undesired penalties or sanctions resulting from provision of incorrect or incomplete information.

Always bear in mind that all investigations and site visits performed by the public officials are the subject matters to be referred to the “Compliance Board”. Therefore, in case of hesitation, you should call the “Compliance Board” using the contact information provided to you and receive detailed information.

Question: I work for the Regulatory Affairs Department. I receive questions from the Ministry of Health and occasionally from the Ministry of Agriculture. Should I consult with the Compliance Board before answering all such questions?

Answer: Your and your Department’s job descriptions contain the duties to communicate with the Ministries of Health and Agriculture, to make applications to such ministries and to answer to the questions received. You can answer such questions by obtaining applicable signatures and complying with the rules of your own department. But, for example, if you receive a question from the Ministry of Industry or Ministry of Finance, you should notify such issues to our Legal Advisor or to the Compliance Board and act in accordance with the instructions to be received from them.

NON-GOVERNMENTAL ORGANIZATIONS

We support and encourage voluntary participation of our employees willing to participate in socially responsible non-governmental organizations that are legally incorporated, and firmly established based on their expertise, experience and competencies, adopting transparency as their most important value and establishing proper monitoring mechanisms, open to participation of individuals having different views and opinions and, more importantly, supporting the development of the society.