

Conflicts of Interest Policy

Introduction:

- At Ileri Group, we are committed to maintaining the highest standards of integrity and professionalism in our business operations. This policy outlines our approach to identifying, managing, and avoiding conflicts of interest.

Policy Statement:

- Ileri Group requires all employees, management, and board members to act in the best interests of the company, avoiding any situation that could lead to a conflict of interest or the appearance of a conflict.

1. Definition of Conflict of Interest:

- A conflict of interest occurs when an individual's personal interests, relationships, or activities interfere, or appear to interfere, with their duties and decision-making at Ileri Group.

2. Identification and Disclosure:

- Employees must disclose any relationships, associations, or activities that might create a conflict of interest.
- Full disclosure enables the company to manage and mitigate potential conflicts effectively.

3. Common Examples of Conflicts:

- Having a financial interest in a competitor, supplier, or customer.
- Engaging in a secondary employment or business that impacts job performance at Ileri Group.
- Using company resources for personal gain.

4. Responsibilities and Compliance:

- Employees are responsible for understanding and complying with this policy.
- Management is responsible for providing guidance and resolving any reported conflicts.

5. Reporting Mechanism:

- A clear process for reporting potential or actual conflicts of interest.
- Protection of employees who report conflicts in good faith from any form of retaliation.

6. Review and Resolution:

- All reported conflicts will be reviewed by a designated committee or officer.
- Appropriate actions, such as recusal or divestment, will be taken to resolve conflicts.



+90 (262) 648 66 66



www.ilerigroup.com
info@ilerigroup.com



TOSB Otomotiv Mah. 13. Sk
N 5-1 Kocaeli/ Türkiye

7. Training and Awareness:

- Regular training sessions on conflicts of interest and ethical conduct.
- Continuous awareness initiatives to keep the policy relevant and top-of-mind.

8. Policy Violations:

- Clear disciplinary measures for violations of the conflicts of interest policy.
- Commitment to enforce the policy fairly and consistently.

Conclusion:

Ileri Group's commitment to ethical business practices includes the rigorous management of conflicts of interest. By adhering to this policy, we uphold our reputation for integrity and protect the interests of our stakeholders.

This document serves as a guideline for Ileri Group's employees and management in understanding and adhering to the standards set for managing conflicts of interest, ensuring ethical conduct and decision-making in the company.



+90 (262) 648 66 66



www.ilerigroup.com
info@ilerigroup.com



TOSB Otomotiv Mah. 13. Sk
N 5-1 Kocaeli/ Türkiye