



Corporate Social Responsibility (CSR) Management Policy

LOMGroup 2017

Corporate Social Responsibility (CSR) Management systems comprise a significant part of the economic, environmental and social responsibility policies of LOMGroup.

ECONOMIC RESPONSIBILITY

LOMGroup’s ‘Economic Responsibility Policy’ is set to manifest Group companies, enabling them to manage their economic impact, taking stakeholder benefits into consideration. This policy is a guiding principle for all Group companies.

LOGroup;

- **Fulfills its responsibilities, while preceding its investments towards sustainable growth targets, considering the Group’s direct and indirect economic impact.**
- **Ensures that the Group companies manage their operations and strive for the highest economic benefit within their value chain, aware of being important actors of economic development in their sectors.**
- **Evaluates, monitors and manages its contribution to economic development under the principles of Risk Management, Responsible Investment and Local Economic Development.**

TARGETS AND COMMITMENT

Local Supply: In line with the local supply policy, encourage all Group companies to institute a data gathering system for determining the Group's local supply financials,

Local Employment: Establish mechanisms to encourage local employment and support vocational school programs,

Infrastructure Investments: Establish a stakeholder feedback mechanism to monitor and assess the results of current local infrastructure investments,

Climate Change/Risk Management: Develop climate change policy and awareness programs within the Group.

ENVIRONMENTAL RESPONSIBILITY

As LOMGroup, we acknowledge that environmental responsibility is directly related to the change of communities' consumption patterns and culture, and has a powerful effect on human rights.

Our key stakeholders and the local communities in the regions we operate respect the ecological environment. This fact reduces our risks and assists us in conducting our business in an environmentally-friendly way.

LOMGroup monitors the environmental performances of the Group companies with care, and supports their efforts to minimize the current and potential impacts of its

products and services on the ecologic and social environment. LOMGroup is committed to operate in alignment with its environmental policy and encourages all Group companies to follow suit.

LOMGroup;

- **Commits to comply with regulatory and voluntary codes and plans its business processes with environmental consciousness.**
- **Expects an environmental management approach from its business partners and supply chain.**
- **Analyzes the environmental impact of its investment and supply chain processes, and pursues new technologies in order to minimize potential negative impacts.**
- **Builds systems and supports awareness programs in order to decrease paper consumption, and encourages the use of recycled paper.**
- **Shows necessary care to operate in accordance with environmental management systems, which help to reduce consumptions, manage wastes and ensure effective logistics management.**
- **Encourages its employees to act with environmental consciousness when making operational decisions and conducting their processes, and strives to create environmental awareness.**

TARGETS AND COMMITMENT

Investment Processes: Include environmental requirements in the investment and audit processes,

Waste Management: Encourage Group companies to pursue and employ waste management and reuse systems,

Employee Awareness: Develop and deploy employee awareness programs within the Group,

Awareness in Supply Chain: Support energy efficiency and environmental consciousness programs within the supply chain and include LOMGroup Environmental Responsibility Policy statement into the supplier agreements,

Reduction of Paper Consumption: Encourage programs for reduction of paper consumption within the Group,

Effective Logistics Management: Support necessary programs for logistics optimization and establish collaboration with Group companies.

EMPLOYEES AND DECENT WORK RESPONSIBILITY

LOMGroup believes that its success is directly linked to the Group's culture of valuing employees and supporting their development. One of the key principles of our Employees and Decent Work Responsibility Policy is being a great place to work for the employees.

LOMGroup;

- **Encourages its employees to work under the umbrella of LOMGroup for the duration of their professional life. Hence, it strongly supports employment and rotation within the Group and actively provides various career opportunities to its successful employees.**
- **Seeks employee feedback with open and transparent communication mechanisms.**
- **Aims to provide the best working conditions for its employees.**
- **Pays attention to the work-life balance of its employees, and supports their professional and personal development through training programs, mentoring and coaching.**
- **Takes precautions and provides solutions for employees' physical and mental health and safety.**
- **Pays attention to equal opportunities for employees, and requires the same level of awareness and practices from its business partners and supply chain.**

TARGETS AND COMMITMENT

Dialogue: Establish an Open Door Policy; improve internal communication support programs,

Transparency: Share the results of feedback processes with employees and establish new feedback mechanisms accordingly,

Training: Support training programs and improve training processes with regards to employee needs and global standards,

Life-long Development: Establish life-long development programs to include voluntary and community work initiatives,

Health and Safety Processes: Implement international standards and encourage employee awareness within the processes,

Career Opportunities within the Group: Reduce employee circulation rate and improve employee satisfaction,

Encouraging Women's Employment: Collaborate with community initiatives and support all activities to include and sustain women in the workforce.

HUMAN RIGHTS

LOMGroup manages its operations in full compliance with local laws and regulations. United Nations Global Compact principles form the basis of the Group's Human Rights Policy. LOMGroup Human Rights Policy also refers to the main principles of United Nations Universal Declaration of Human Rights and its protocols, United Nations Convention of International Covenant on Civil and Political Rights, United Nations Convention of International Covenant on Economic, Social and Cultural Rights, ILO Declaration on Fundamental Principles and

Rights at Work, and the Vienna Declaration and Program of Action.

LOMGroup;

- **Gives special importance to establishing dialogue platforms regarding human rights while operating its businesses and managing its processes.**
- **Takes precautions to protect the rights of local communities.**
- **Requires a respectful human rights approach from every business partner, including suppliers.**
- **Conducts and encourages training and awareness programs regarding human rights in its value chain and among employees.**

TARGETS AND COMMITMENT

Policy and Strategy: Disseminate the Group's Human Rights Policy within the value chain,

Dialogue Platforms: Highlight the importance of human rights and effectively communicate Group's approach,

Training and Awareness Programs: Organize human rights e-learning training for employees and promote awareness programs with the support of community initiatives about women.

PRODUCT AND SERVICE RESPONSIBILITY

LOMGroup monitors all processes among the Group companies to reach absolute customer satisfaction. It also supports systems created by Group companies in examining customer concerns, analyzing feedback and responding.

LOMGroup;

- Gives top priority to customer satisfaction and performs its business in full compliance with laws and regulations.**
- Analyses risks of customer health and safety with expert teams and ensures that business processes and configurations are designed and deployed accordingly.**
- Complies with laws and regulations regarding customer health and safety, and continuously strives to enhance its products and service quality.**
- Acknowledges that providing full and accurate information regarding products and services is crucial for ethical business conduct, and ensures necessary precautions and audit processes in Group companies.**
- Acknowledges that providing full and accurate information regarding products and services is crucial for ethical business conduct,**
and ensures necessary precautions and audit processes in Group companies.

TARGETS AND COMMITMENT

Compliance with Laws and Regulations: Include responsible marketing principles to audit processes

and monitor the third parties' performances that are collaborated with,

Informing about Products and Services: Study on Group's Ethics Code and include responsible marketing principles,

Customer Health and Safety Risk Analysis: Encourage Group companies to comply with international standards on

customer health and safety, and include this principle in audit processes,

Customer Health and Safety Trainings: Provide tools to communicate information on customer health and safety to all employees

and collaborate with community initiatives.

COMMUNITY ENGAGEMENT

LOMGroup strives to fulfill its responsibility for the development of community in the highest level and creates new employment opportunities by contributing to regional growth.

LOMGroup;

- **Internalizes responsible investment principles in its businesses for the benefits of community,**
- **Analyzes the expectations of the community and carefully manages the systems, which will help them to take part in decision processes and reduce the potential impact on their social life and well-being.**
- **Gives top priority to be responsive to the needs of the community.**
- **Monitors business processes for anti-corruption and complies fully with respective laws and regulations. LOMGroup believes that the primary responsibility of a company is doing its business ethically for the community's well-being.**
- **Encourages its business partners and Group companies to establish necessary monitoring mechanisms to foresee and prevent potential corruption risks.**
- **Aims to be a role model to its stakeholders with its ethical business approach and executes awareness programs in order to extend Group's approach among its suppliers and other third parties.**

TARGETS AND COMMITMENT

Support Community Development: Engage with community initiatives related to business impact in all sectors it operates,

Responsible Competition: Comply with international competitiveness strategies and voluntary codes,

Anti-corruption Policies: Study Group's Code of Ethics, encourage Group companies accordingly, require third parties to sign Group's ethical principles.