

**AIFD**  
**CODE OF PRACTICE FOR**  
**COMPETITION RULES**

**Date of Preparation: April 2021**

**A. Purpose**

The purpose of this document is to designate the principles to be observed and the procedures to be followed within the scope of competition rules in the work to be conducted and in the business life of members of the Association's bodies, Strategic Management Committees/SMCs, Task Forces/TFs, permanent or ad hoc Working Groups, Communication Groups/CGs and AIFD employees in accordance with AIFD Competition Rules Compliance Guideline.

**B. Scope**

The rules stipulated in this document will be applicable in matters related to competition law in the work to be carried out by functional and operational working bodies within AIFD, including the Board of Directors and the Board of Auditors, as well as AIFD employees.

AIFD lays out explicitly the importance placed on compliance the competition rules with this code of practice. The purpose or practices of AIFD shall not violate the competition rules by any means whatsoever.

AIFD's Board of Directors is responsible for the enforcement of all requirements stipulated in this code of practice.

**C. Banned Practices under the Competition Law**

The type behaviors which are against the law are defined in AIFD's Competition Guideline. Therefore, the behaviors restricted by the Competition Law should be taken into account in the enforcement of this code of practice.

**D. AIFD's Conflict of Interests Principles**

AIFD is a non-profit, non-governmental organization not engaged in commercial activities. Despite the absence of a commercial component as an association, AIFD may be involved in activities regarding the commercial components and/or outcomes of commercial activities of its members in its operations performed in line with its Charter – as exemplified in but not limited to the activities presented below. In such types of activities, AIFD's core principle is to oversee the interest of the whole industry and treat all its members equally.

- In any work involving commercial components or operations, the operation procedures should be designated beforehand upon identifying the level of the AIFD group to carry out the work and the participants to be involved in this work, legal advice should be sought concerning the legal risks, and the records of this work should be preserved within the framework of the rules designated in this SOP.

- AIFD may refrain from taking a position regarding the relevant study in sensitive matters within the scope of its internal rules, in circumstances that do not constitute a common industrial interest, or in the emergence of conflict of interests among the members.
- In case AIFD would like to take a position in a study involving commercial components, the scope and application limits of AIFD's position should be clearly defined.

Topics involving commercial components or commercial outcomes directly or indirectly are presented below:

- Partitioning of customers,
- Partitioning of the market,
- Market introduction/not entering the market,
- Prevention of access to medicines,
- Pushing competitors out of the market,
- Change in supply of or request for goods,
- Exchange of information.

#### **E. Duties of AIFD Competition Rules Compliance Officer**

AIFD's Compliance Officer will be appointed for ensuring accurate and timely enforcement of competition rules across the Association. The Compliance Officer will be authorized in three main areas:

- Enforcement of competition rules among AIFD's internal stakeholders,
- Enforcement of competition rules in AIFD's relations with external stakeholders and,
- Execution of the duties designated within the scope of the Program for Compliance with Competition Rules.

The duties of the Compliance Officer will be as follows:

- To ensure that the personnel (all personnel involved in the organization of the Association, including interns, regardless of whether they work on a full-time, part-time, permanent basis or provide external service against invoice) and members and/or representatives of members working voluntarily receive continuous and regular training,
- To ensure the development and continuation of competition awareness within the Association,
- To ensure that the relations outside the Association are managed soundly within the scope of competition rules,
- To follow up whether the secretariat fulfills its administrative duties and adopt relevant measures in case of detection of deficiencies,
- To duly preserve in AIFD's digital records the agendas of the meetings held within AIFD, relevant list of participants and meeting notes, where available, adopt relevant measures and ensure coordination among AIFD's employees for this purpose,
- To inform the bodies of the Association on the managerial and practical developments in the field of competition.

The Compliance Officer will be responsible for the following tasks as well:

- He/she will be responsible, together with the Secretary General, for the enforcement of the competition rules concerning the objective, agenda, and content of the board and GM meetings.
- He/she will follow up the application of competition rules via the designated person in AIFD's Working groups.
- He/she will execute the duties defined under the "Corporate Governance" section in this code of practice.
- He/she will regularly observe the conditions of the procedures stipulated in this code of practice in the Competition Rules Guideline for identifying potential setbacks that may occur during meetings.
- He/she will request that the work of the personnel and members and/or representatives of members is regularly checked to confirm compliance in communications and documents. These checks may be performed by the Compliance Officer himself/herself, or external consulting may be requested for the conduct of audits, where necessary.
- He/she will check personally or via consultants on a periodic basis regularly kept official documents such as board decisions.
- In case of detection of violation of the procedures presented in the Guideline, he/she will send a warning to relevant persons. In case of detection of violation of the procedures presented in the Competition Rules Guideline or this Code of Practice twice by the same person within a calendar year, the Compliance Officer may decide to ban the relevant person from receiving training and/or attending meetings for a specific period.
- The Competition Compliance Officer may receive external legal services/consultancy, where necessary when performing his/her duties.

#### **F. Duties of AIFD's Secretariat<sup>1</sup>**

The secretariat is responsible for three main duties related to compliance with competition rules:

- To keep regular records of internal and external reports and communications, and inform the Compliance Officer thereof, where necessary,
- To perform the following tasks concerning meetings:
  - To organize the time and venue of the meetings,
  - To ensure that the records required to be kept in the meetings (meeting attendance, agenda, and meeting notes) are duly kept,
- To inform the Compliance Officer in case of deficiencies in the records.

#### **G. AIFD's Operating Principles within the scope of Competition Rules**

All AIFD employees are obliged to supervise the actions that may enter into the scope of competition rules in the execution of their duties and comply with the points indicated in this code of practice. All employees should undertake personal responsibility on compliance with competition rules and inform AIFD's Compliance Officer in case of any doubt regarding compliance.

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<sup>1</sup> This refers to all personnel other than the attendants serving in the secretariat of the Association and except for permanent or temporary, full-time, or half-time employees.

All committees and groups operating within AIFD<sup>2</sup> should be aware of the importance of compliance with rules and act according to these rules.

## 1. General Meeting Rules

The Association is responsible for the meetings held within its scope, and it should thus be ensured that the meetings do not give rise to any inconvenience in terms of competition rules and relevant measures should be adopted.

Any type of communication environment where competitors convene within the Association (in online or face-to-face format) is included in the scope of competition rules. Any correspondence related to a meeting carried out in any type of analog/digital application in printed or electronic format before or after a meeting is included in this scope. Thus, compliance to AIFD's meeting procedures is important for an adequate conduct of the meetings within the scope of competition rules. The general rules to be used in all meetings where meetings convene are presented below:

### 1.1. Actions Before A Meeting

- Each meeting should have an agenda to be designated before the meeting.
- A list of attendees should be prepared for each meeting. The name, position, and company of the persons who participate in the meeting should be specified on the list of attendees. The venue/channel of the meeting, as well as its date, should be clearly specified. The list of attendees should include an introductory clause confirming that the attendees will act in line with this Guideline which should be signed by each participant attending the meeting, and the electronic commitment text regarding competition rules, sent before online meetings, should be approved.
- The definition and objective of the committee, board, working group, sub-committee, and similar gatherings organizing the meeting and relevant AIFD officer (AIFD employee or external consultant) should be specified.
- In case of amendment of the meeting agenda, sufficient time should be allocated to the participants for evaluation and legal advice should be received, where necessary, regarding the agenda amendments.
- Legal advice should be received in case of any doubts related to the meeting agenda.
- Each meeting attendant should be associated with the meeting agenda from an administrative or technical perspective. For instance, individuals responsible for commercial matters should not attend a technical meeting.

### 1.2. Actions During A Meeting

- An AIFD representative (AIFD employee or external consultant) should be present at each meeting.

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<sup>2</sup> As the committees and groups specified in this SOP convene under the roof of AIFD and work for AIFD, their work and the content they create may anyhow be subject to revision by AIFD.

- AIFD competition rules should be briefly reminded at the beginning of the meeting.
- Each participant must adhere to the meeting agenda. In case it is decided that it is necessary to discuss a topic other than those specified beforehand, such matters should be evaluated under the heading of “wishes and proposals” and each topic discussed should be recorded in the meeting minutes.
- In case of any request for amending the agenda during a meeting or where the topics discussed outside the agenda regardless of not being on the agenda or where the topics on which a decision will be adopted is related to competition rules, the meeting should be recessed, and the Compliance Officer should be informed thereof. In case of approval by the Compliance Officer, the new topics requested should be added to the meeting agenda and the meeting may be resumed. In case of failure to receive a positive response for agenda amendments concerning competition rules or where the relevant parties may not be reached, the meeting may be resumed only within the scope of the declared agenda.
- Where deemed necessary depending on the level and content of the meeting, legal consultants should be invited to the meeting or legal support should be requested beforehand.
- Meeting attendees should not share by any means whatsoever competition-sensitive commercial information in meetings convening competitors.
- In cases where the AIFD employee or external consultant responsible for the meeting notices a competition-sensitive topic in the meeting agenda or where the topics discussed during the meeting become sensitive in terms of competition should recess the meeting and inform the Compliance Officer thereof. The meeting should not be resumed before eliminating the hesitation on compliance with or before the topic is removed from the agenda.
- In case competition-sensitive topics begin to be discussed during the meeting, the meeting officer should forthwith stop the discussion of the referred agenda item. If the topic continues to be discussed despite this warning, the meeting officer should forthwith end the meeting and inform the Compliance Officer thereof.

### **1.3. Actions After the Meeting**

AIFD’s meeting officer or the external consultant, if appointed as an officer, will do the following:

- (i) He/she will prepare the list of names of meeting attendees, their company, and roles in face-to-face meetings, upon taking the signature of the attendees.
- (ii) He/she will digitally procure the list of persons who registered and participated in the meeting (upon specifying their name, company, and position) in online meetings.
- He/she will record the list of attendees, meeting agenda, and the meeting notes shared in case the meeting notes are shared at the end of the meeting in the relevant folder on AIFD’s joint network.
- In case it is necessary to share the meeting notes, he/she will prepare the meeting notes and share them with the meeting attendees. (In case the members who attend the meeting would like to share the meeting notes, these notes should first be shared with the relevant AIFD employee or responsible external consultant; the AIFD employee or responsible external consultant will check the notes and share them with the other attendees.)

#### **1.4. Actions to Be Strictly Avoided During A Meeting**

- Commercial topics and/or competition-sensitive matters should not be included in the meeting agenda and discussed by any means whatsoever. (Information such as prices, price levels, pricing policies, price anticipations, regional or product restrictions, partitioning customers, partitioning markets, sales terms, discount terms, free goods, price margins, output levels, capacity levels and quantity, company-based product and distribution costs, cost calculation methods or formulas, market shares, sources of procurement of goods and products, any kind of non-public information, the decision of companies to enter or not to enter a market, strategic decisions of companies, prospective production technologies, production and sales plans, information on individual customers, suppliers or distributors may be regarded as examples of commercial secret.)
- In case of need to discuss the topics on which the public authorities request an opinion and/or which are arranged by legislation and may be regarded as commercial, legal advice should be received before the meeting, or a legal expert should attend the meeting. The meeting shall not be held before receiving an opinion or ensuring the attendance of a legal expert on such topics beforehand.
- In case the subject of the meeting is not commercial but requires a joint decision or action, the meeting shall not be held before receiving a legal advice.

## **2. Specific Rules for AIFD's Association Bodies and Working Groups**

In meetings of AIFD's working groups, the AIFD employee responsible for meetings and the chairpersons of relevant groups will be responsible for ensuring the application of the rules stipulated in this code of practice related to competition rules.

### **2.1. Board and GM Meetings**

The duties of the Board of Directors are constituted by the elements specified in the Association Charter. In case AIFD's board meetings are held within the scope of the Association Charter, no competition element will be discussed.

Matters to be considered in the board and GM meetings:

- Maximum sensitivity should be displayed in terms of compliance with rules in these high-level meetings.
- Special care should be displayed in the statements used during the discussions in such kinds of meetings, in the meeting notes, and the consensus reached for acting jointly in practices and decisions adopted after these meetings.
- It is necessary to receive legal support in such kinds of meetings (in case topics considered as sensitive are included on the agenda) and an expert should be present for ensuring compliance with rules in such kinds of meetings.

## 2.2. Strategic Management Committees/SMCs

Committee members should receive training on competition rules within AIFD or in their own companies. Persons who have not received training shall not attend the meetings within AIFD.

The responsibility of fulfilling all SMC activities, including the coordination of SMC meetings, note-keeping, and chairing the meeting in case of the absence of a mentor rests with the AIFD employee responsible for that SMC. Therefore, the relevant AIFD employee is expected to fulfill the following under this code of practice:

- Fulfillment of the tasks specified in the general meeting rules,
- Keeping the meeting notes, where necessary, and editing them after the meeting, and sharing them with the members in a summarized format,
- The AIFD employee responsible for the relevant SMC may request AIFD's competition law consultant to attend the meeting in full or in part depending on the SMC's agenda.

In case of the inability of AIFD's responsible officer to attend the meeting, the mentors will ensure the relevant distribution of tasks within the group. In case of the absence of mentors, the duty of keeping meeting notes and chairing the meeting will be enabled via the distribution of tasks among the attendees. In this case, the meeting notes will be shared individually with AIFD's responsible officer who will share the notes with other committee members upon checking them.

## 2.3. Task Forces/TFs

Task forces are technical management committees established for ensuring that the Association's work on technical matters is conducted in the fastest and most efficient manner. The activities of task forces are performed under the coordination of AIFD's TF officer. The relevant TF officer will ensure that the meeting rules specified in this SOP are observed in these meetings.

The working agendas of task forces should be restricted exclusively to the field of operation of the committee.

## 2.4. Working Groups/WGs

Working groups are established for performing activities aimed at acquiring detailed information on a new agenda item or a special research subject related to the fields of operation of the companies.

When decision is made to establish a working group, all members related to the relevant subject matter will be invited. All members will be invited to the meetings related to the fields in which all companies may contribute at a general level, independent from their activities, such as legal arrangements or health policies.

Following the establishment of a working group, an external consultant responsible for the relevant working group will be appointed where deemed necessary by AIFD. The external consultant will be responsible for the meeting agendas and coordinating the activities performed in line with the general meeting rules specified in this code of practice.

- Only general topics of relevance for everyone may be discussed in the working groups.
- Matters related to commercial topics cannot be discussed in the working groups. It is the responsibility working group's management and the relevant external consultant to designate the sensitivities concerning competition in these groups and receive relevant support.
- A study outcome paper may be produced as a result of the research conducted by working groups to be evaluated by AIFD's other committees. In this case, the SMC will discuss to determine whether a position needs to be adopted in consequence to this paper. Research activities will be performed only about the topic selected by the working groups and what needs to be done in consequence to the research will not be debated at the working group level.
- The activities of the working group will terminate upon the preparation of a joint paper indicating the outcomes of the study following the research conducted in the working group. In case of failure for the working group members to produce a joint study outcome paper, the activities of the working group will be deemed terminated.

## **2.5. Communication groups /CGs (e-mail groups)**

These refer to the COMMUNICATION (e-mail) groups composed regarding topics of common interest for the industry which are of relevance for all member companies (regulatory, pricing, reimbursement, good clinical practices, good promotion practices, intellectual property, and communication).

In case members are asked to submit their views on the information shared in the e-mail communication groups, it should be reminded that the members should share their views only with the AIFD employee who sent the e-mail. Relevant AIFD employees should decide on whether individually submitted views of the members will be collectively shared with the other members. In case of any doubt of AIFD employees on the information to be shared, the advice of the AIFD Compliance Officer should be sought.

Members should not communicate directly with each other via e-mail groups. In case members ask a question of relevance for the e-mail groups, they should send their questions and requests only to the relevant AIFD employee. The relevant AIFD employee may ask for the advice of other members, where necessary, upon the evaluation of the request submitted to him/her. Information sent by members to the relevant AIFD employee should be kept confidential.

All information to be received from the members of the correspondence groups with the extension "@aifd.org.tr" should be kept confidential, no personal copies should be made, and

they should not be shared with and reported to any third parties outside the member company for which they work.

## **2.6. Communication with Members:**

The correspondence between members and AIFD employees should be performed via e-mail with the extension “@aifd.org.tr” of the relevant AIFD employee.

Communication should be performed via the e-mails bearing the Association’s address (“@aifd.org.tr”) by SMCs, Committees, and Working Groups.

## **3. Procedures**

### **3.1. Documents**

Associations produce many documents when fulfilling their duties. Such documents constitute indispensable instruments for eliminating any doubtful circumstances and clarifying vague matters (as long as they comply with the rules).

E-mails, letters, fax messages, memos, reports, evaluations, presentations, press releases, web pages, meeting notes, summary notes, notes taken on the agendas, business plans, as well as all written correspondence such as post-its and/or digitally kept correspondences are regarded as documents.

It is primarily important to pay attention to the content of each document produced.

- The source of each document should be specified. The unit/person who produced that document, the date on which it was produced, as well the sources utilized, where available and the purpose of production should be indicated in the document.
- In case of any hesitation regarding the content of the document produced, legal support should be requested via the AIFD Compliance Officer.
- When a document that is believed to potentially give rise to misunderstandings is sent by a member, legal support should be sought to determine the kind of response to be sent for this document.

In case the documents produced contain competitor information:

- i) Competition-Sensitive Information (strategic, future-oriented and/or commercial data)
  - Competition-sensitive information of competitors shall not be collected at AIFD by any means whatsoever. In case public institutions request for the collection of such information, they should be advised to seek such information directly from member companies.
  - As an exception, where it is decided to collect such kind of data, the purpose of collecting the data and how they will be collected and used should be clarified and legal advice should always be sought before collecting the data. In case the information collected contains company information, such information should be collected by AIFD employees

or independent service providers proposed by AIFD and should not be shared with the members under any form and condition. (It is mandatory to receive a legal advice on this topic).

- The information received from members should be retained by AIFD employees and the independent service providers proposed by AIFD.
  - In the documents produced by AIFD employees or independent service providers proposed by AIFD upon using the information received from the members, the source of the document and the way in which the data have been procured from what sources should be clearly specified and the work produced as well as the information and documents procured should not be shared with anyone outside the relevant public institutions and AIFD. Legal advice should be strictly sought in the event of any uncertainty.
- ii) Regarding technical information:
- Normally, documents and information of a technical nature which do not contain confidential company information may be collected, used, and disseminated by the Association.
  - Legal advice should be sought in the event of any uncertainty.

### **3.2. Legally protected documents**

If the legal advice to be received from attorneys does not contain an anti-competitive purpose, such correspondence will be under legal protection.

The source should be carefully identified in such kinds of documents which should be clearly archived, where possible. Such kinds of legally protected documents that are clearly archived shall not be shared with competition authorities.

### **3.3. Important Document Types**

#### **3.3.1. Presentations and Reports**

- The source and place of use of presentations and reports should be clearly specified.
- The person who created the presentation or report should be clearly indicated.
- The source of any data and information in the presentation or report should be specified.
- The information and data received from members should be included in a presentation only after undergoing a legal evaluation.

#### **3.3.2. E-mails**

- The content of e-mail messages should be clear and free from any ambiguity.
- The recipients should be clearly specified. In this respect, the distribution groups of the e-mail should be carefully designated.
- In case they contain competition-sensitive information, a legal review should first be made.

- After the legal review, and after a consensus is reached that the e-mails can be distributed, the message should be forwarded only to predesignated groups and recipients should anyhow be asked to avoid sharing it with anyone outside the intended distribution group.
- The subject line of the e-mail message should be clear.
- In case of attachments, the documents should be reviewed to check for the aspects requiring attention in terms of their compliance with the competition rules.
- Relevant reservations and warnings associated with compliance with competition law should be added to the e-mails.

#### 4. Communication

All rules specified in the AIFD Competition Rules Compliance Guideline and this code of practice should be considered in all verbal and written communications within and outside the company.

The following points should be considered in the communications:

- Statements that go beyond the intended purpose and extremely emotional language should be avoided.
- It should be remembered that a piece of communication may be viewed by a person other than the intended recipient, which may cause the message to over-reach its purpose.
- Care should be taken with the subject matter, recipient persons, and/or organizations.

As in all matters, legal advice should be sought in case of any doubt under any form and condition, to provide clarification.

#### 5. Practices Related to AIFD's Confidential Information

AIFD's confidential information includes any projects, activities, projections and predictions, plans, know-how, working models, policies and processes, databases, any records, any analyses, studies, reports or discussions resulting from the work of AIFD working groups, whether in written, oral, visual or electronic form, and any communications and correspondence used in accessing the same, whether electronically or on paper, including without limitation any information, disclosed or to be disclosed to a person or previously known, including any copies thereof.

AIFD staff and employees of member companies having a role within AIFD, also representatives or consultants of AIFD and/or member companies having a role within AIFD (all referred to as "employees/representatives/consultants" hereinafter) will maintain the confidentiality of the information described above.

Therefore, employees/representatives/consultants should protect the confidentiality of AIFD's information at all times within/outside AIFD, in the working groups and/or during and after project work. Unless instructed otherwise by AIFD, they may not use or transfer confidential information, nor may they store it anywhere but in the workplace or on work computers, nor disseminate, disclose, make personal copies of and/or report the same.

## 6. Violation of Competition Rules

In case non-compliance with Competition Rules is detected, the AIFD Board of Directors will consider the severity of the violation, take whatever action it deems appropriate, and impose an administrative penalty against offenders.

- Any suspected case of noncompliance with Competition Rules should first be reported to the Compliance Officer.
- Depending on the severity, the Compliance Officer may escalate the matter to the Board of Directors, or personally take action without delay where appropriate.
- If there is uncertainty as to whether non-compliance has occurred, the Compliance Officer should seek legal advice for clarity.
- If it is concluded that a violation is in place, the Compliance Officer will initiate steps to immediately stop the violation.

If a violation is clearly established, the offenders will be subjected to administrative sanctions which may include termination of employment or barring from association activities for members and/or representatives of members. It is a priority objective to take measures to prevent recurrence and further to rehabilitate offenders through training and other administrative penalties.

### Rules to Be Observed During On-Site Audits

The Competition Board may perform “on-site audits”, where deemed necessary, in the head office or representative office of the Association. All kinds of printed documents and digital records including those on mobile phones may be inspected during the on-site audit, and the computers of the employees and the Association’s servers, thus all kinds of digital records or backups may be audited physically or remotely via remote access methods.

### General Rules for On-Site Audits

- In case of an on-site audit, the AIFD Compliance Officer and legal expert on competition law should be informed thereof.
- The requests of experts should be fulfilled as soon as possible.
- Visiting officials should be treated with courtesy without entering into a discussion or disagreement.
- Topics that may be misunderstood should be clarified.
- Competition Board Experts should be supervised continuously to ensure that their questions are answered, and assistance is provided in other matters.
- An assistant should be assigned for each team in case they break up into groups.
- Notes should be taken on the topics of discussion with the experts.
- Three copies should be produced from each photocopy or digital copy requested by the Competition Board Experts (for the Competition Board Experts, the Association, and the consultant).
- The documents should be presented to the Competition Board Experts without any modification.

- If a document is construed erroneously, its true character or origin should be forthwith explained.
- Legal confidentiality rights should be invoked for any reports that had been prepared using external Competition Consultancy and for any correspondence with the External Competition Consultant.

### **During On-Site Inspection**

- The persons and experts auditing the records should be supervised at all times.
- Confidentiality of personal data should be reminded to the experts in the inspection of mobile phones.
- The request for submitting a written response should be specified regarding matters with unsure responses.
- Three copies should be taken from the photocopies, printouts, and digital records of the documents requested (for the Competition Board Experts, the Association, and the consultant).
- An explanation should be provided in case of any topics which may be misunderstood in the official report prepared at the end of the on-site audit and a request should be made for signing the report after being corrected.
- In case of dismissal of the request for correction, the report should be signed with reservations.

## **ANNEX 1**

### **EXAMPLES OF DISCLAIMERS WHERE RESERVATIONS ARE MADE WITHIN THE SCOPE OF THE COMPETITION RULES**

“Unless indicated otherwise, the information contained in this document is compiled from government sources or sources otherwise available to the public.”

“The views presented in this document are based on the findings of a study conducted by our Association on these issues and are not binding on our members who are at liberty to make their commercial decisions as it suits their respective commercial interests.”

“The data presented in this document comprise information collected from our member companies upon an explicit official request by government representatives. The data herein will not be shared with our member companies under any circumstances. This collection of data is intended to provide a compilation of information and/or data per the request of government representatives.”

“The information and views presented herein are confidential and intended solely for use during negotiations with government representatives. They are not in any way representative of a common stance or attitude of our member companies.”

“The scenarios depicted in this document should be not considered as reflecting the common view of AIFD. These scenarios are only intended to provide an assessment of the probable outcome of potential implications. If circumstances arise which warrant taking a common stance, AIFD is obligated to act on relevant legal advice to ensure compliance with all applicable legislation, and to support any efforts toward that end.”

## **ANNEX 2**

### **INTRODUCTORY CLAUSE OF LIST OF PHYSICALLY ATTENDING PARTICIPANTS**

In order to ensure healthy development of the sector, compliance with the Competition Rules is considered one of the essential values of AIFD.

The undersigned attendees on this list hereby agree, represent and warrant that they have read and understood the Competition Rules Compliance Guideline and the meeting guidelines drafted by AIFD, that they will act in line with the Competition Law in all the meetings to be organized within AIFD, that they will forthwith notify the administrators of the Association in case they identify violation of competition rules, that they will maintain confidentiality of any information acquired during the activities of the Association, that they will never use directly or indirectly by any means whatsoever, transfer elsewhere, publish, disclose, make personal copies of or report such information to any third party outside the company, and that they will abide by the sanctions issued by AIFD's Disciplinary Committee in case of violation of competition rules resulting from their acts or violation of confidentiality of information, and approve the processing and storage by AIFD of their personal data within the scope of Personal Data Protection Law No. 6698 and their sharing with the Association's members and the institutions and organizations with which the Association is cooperating and the participants of the working groups and/or committees coordinated by the Association.

### **ANNEX 3**

#### **CONSENT DISCLAIMER FOR ONLINE MEETINGS**

The person invited with below-mentioned link who clicks on the approval button for joining this online meeting hereby agrees, represents and warrants that he/she has read the Competition Rules Compliance Guideline drafted by AIFD as well as the meeting principles regulation, that they will act in line with the Competition Law in all the meetings to be organized within AIFD, that he/she will forthwith inform the administrators of the Association in case they identify violation of competition rules, that he/she will keep confidential all the information acquired on the activities of the Association, that he/she will not use directly or indirectly by any means whatsoever, transfer, publish, disclose, make personal copies of or report to any third party outside the company the information acquired, that he/she will not record the meeting, and also that in case of violation of competition rules resulting from his/her acts or violation of confidentiality of information, he/she will agree with the sanctions notified by AIFD's Disciplinary Committee, and approves the processing and storage by AIFD of his/her personal data within the scope of Personal Data Protection Law No. 6698 and their sharing with the Association's members and the institutions and organizations with which the Association is cooperating and the participants of the working groups and/or committees coordinated by the Association.

## **ANNEX 4**

### **Participant's Commitment on**

#### **AIFD's E-Mail Groups**

By participating in the committees and/or working groups corresponding via the e-mail address with the extension "aifd@org.tr" managed by AIFD, I hereby agree, represent and warrant that I have read and understood the Competition Rules Compliance Guideline drawn up by AIFD, that I will act in line with the Competition Law in the e-mails to be sent to and/or received from the e-mail groups with the extension "@aifd.org.tr", that I will forthwith notify the Administrators of the Association in case I identify any violation of competition rules, that I will keep confidential all information acquired from this e-mail group, that I will never use them directly or indirectly by any means whatsoever, will not transfer them elsewhere, publish or disclose them, make a personal copy thereof, or report them to a third party outside the member company I work for, and that I will abide by the sanctions issued by AIFD's Disciplinary Committee in case violation of competition rules or violation of data confidentiality as a result of my acts. I hereby agree, represent, and warrant that this commitment is applicable also for all electronic communication groups formed and managed by AIFD or involving AIFD.

Name of the member company

E-mail address

Name/Surname/Signature