
1. OMURGA GAYRİMENKUL PORTFÖY YÖNETİMİ A.Ş.

Emergency and Contingency Plan Procedure

Date : 15 July 2015

Revision : 2.0

1. PURPOSE

The purpose of this regulation is to define tasks, authorizations and workflows of Omurga Gayrimenkul Portföy A.Ş. aimed at the conditions, methods and procedures of fulfilling their obligations towards its personnel, customers, market participants, shareholders and third parties in case of an emergency or a contingency.

2. DEFINITIONS

- a) **Company:** Omurga Gayrimenkul Portföy Yönetimi A.Ş.
- b) **Board:** Capital Markets Board (CMB)
- c) **Law:** Capital Markets Law of 6362
- d) **Disclosure:** Portfolio Management Company and the Fundamentals Relevant to the Operations of These Companies (III-55.1)
- e) **Depository Institution:** Institution where belongings of portfolio management customers are deposited.
- f) **CRA:** Central Registry Agency Inc.
- g) **Takasbank :** İstanbul Settlement and Custody Bank Inc.
- h) **BIST:** Borsa İstanbul A.Ş.
- i) **Senior Management:** General Manager and Assistant General Managers
- j) **Outsourced Services:** Company's outsourced services on supervision, internal check, research, fund service unit, risk management system, information systems and accounting systems provided during its operations within the frame of the principles specified in the 19th article of the Disclosure and provided that permission is obtained from the Board
- k) **Emergency and Contingency Plan:** Company's plan defining the conditions, methods and procedures of fulfilling its obligations towards its customers, intermediaries, market participants and third parties in case of an emergency or a contingency

- l) **Data processing systems:** Company's systems ensuring that the company maintains its normal operations, orders of the people receiving service are submitted and conducted, settlement and depositing operations are executed, and accounts of the people receiving service are deposited

and followed

3. DEFINITION OF EMERGENCY AND CONTINGENCY

Emergencies and contingencies that interrupt normal operating of the company and/or prevent company from providing service are specified as follows:

- Natural disasters (Earthquakes, fire, flood, disasters such as storm etc., wars, terrorist attacks, civil unrest, etc.)
- Contingencies that take place in the building in which operations are continued (fire, explosion, flood, A/C breakdown in the system room, etc.)
- Situations such as terrorist attacks, wars, civil uprising and work stoppage that prevent Company personnel from coming to office
- Infrastructure problems that interrupt company's operations, long-continued power and line outages, company's data processing system becoming inoperative, outside attacks to the Company system (hacker attacks, virus, problems on internet line, etc.)
- Situations in which processes cannot be continued in financial markets due to extraordinary situations that occur in these markets, and collection and payment systems that do not work.
- Situations in which supportive services such as fund service unit, risk management, supervision and internal check, research, depositing, accounting, legal and information systems cannot be provided due to extraordinary situations stemming from institutions from which outsourced support service is received

Every kind of contingency that restricts company's operations or that may result in dissolution of the company is considered as "emergency and contingency".

4. EMERGENCY AND CONTINGENCY RESPONSIBLES

Every employee in charge is responsible from the execution of the processes and actions in their unit without interruption as part of the emergency and contingency plan. Responsible Company employees that are assigned upon the decision of the Board of Directors are responsible for applying the emergency and contingency plans and ensuring the necessary coordination. In cases where emergency and contingency responsables cannot perform their duties, Company employees selected as alternatives perform the duties of emergency and contingency responsables with all authorities and responsibilities.

Titles of emergency and contingency responsables and alternative responsables, and their contact information including their e-mail addresses, phone, mobile and fax numbers are notified to the CMB, BIST, CRA, Takasbank and to other institutions specified by the CMB.

5. EMERGENCY AND CONTINGENCY WORKFLOW

Measures that need to be taken, studies and preparations that need to be conducted according to the "Emergency Plan" prior to a possible disaster are coordinated by the General Manager or an alternative responsible.

A. Detection of the Situation

- a. After receiving notification of an emergency or a contingency, emergency and contingency responsible calls the personnel and the Board of Directors to a meeting at the Company's headquarter, or if not possible, at an alternative specified area without waiting for a second notification.
- b. Emergency and contingency responsible may assign company personnel, if necessary. The arising situation is defined according to the information obtained from people informed of the issue in order to determine solutions and methods, in case of an emergency or a contingency. The reason why the situation has occurred is specified. After defining the emergency and contingency situation, emergency and contingency responsible reports this to the personnel and the Board of Directors.
- c. Emergency and contingency responsible measures the risk or damage that is possible or already exists for the company, personnel and customer in consequence of the emergency and contingency. When expertise is needed, an expert is consulted. Evaluation results are detected as reported and presented to the Board of Directors.
- d. Measures to be taken for the services of primary importance in case of their interruption when this emergency and contingency stems from outsourced service providing institutions are specified below.
 1. Fund Service Unit: Fund Service Unit service is provided from T. İş Bankası A.Ş. As the investment fund valuation service is included in the Financial Markets Unit Business Continuity Plan of T. İş Bankası A.Ş. dated 01.04.2015 as a Critical Process (1), valuation service is required to be recovered within 1 day. When the services are disrupted, the emergency plan established by T. İş Bankası A.Ş. will be obeyed.
 2. Risk Management System: The institution that is providing risk management system service, RiskAktif Eğitim Yazılım Danışmanlık Ltd. Şti. performs its duties on several servers with back-ups

to avoid interruptions in its services. In case of a possible service outage, it will be continued to receive service manually over alternative communication channels in accordance with the emergency plan of the firm RiskAktif.

3. Information Systems Support Services: In case of an interruption in the services of the institution that is providing Information Systems Support Services, service will be provided from Mouse Bilgisayar, a firm that is able to provide service of similar nature until the interruption is resolved.
4. Supervision and Internal Check Support Services: In case of an interruption in the services of the institution that is providing Supervision and Internal Check Support Services, daily internal check activities will be undertaken by the Financial Affairs Unit under the Member of Board of Directors responsible from Internal Check, until the interruption is resolved.
5. As the assets and fund/funds assets of customers are deposited in the Depository Institution and independent from the company, no risk is predicted. In case that the company decides not to continue its operations, it will be ensured that the customers access to their accounts and the relevant depository banks and if requested, the required support in asset transfer will be provided to the customers. (Hereby it is assumed that Borsa İstanbul Inc., Central Registry Agency Inc., İstanbul Settlement and Custody Bank Inc. and Banks continue their operations.)

B. Actions to be Taken in Relation to the Information Services and Documents

Backing up information systems of the company and documents and the issues specified below within this scope will be performed by the relevant Unit Managers/Responsibles.

- a) Every kind of customer information within the frame of the data processing systems, records and negotiable instruments that are obliged to be kept by the current regulation will be maintained as printed or electronically for at least five years or for a time specified by the legal regulation as part of emergency and contingency. In order for the technology infrastructure to be maintained to enable the company to continue its operations without interruption, back-up systems will be utilized and critical data will be backed up on a regular basis every night at 22:00 on the Amazon S3 Cloud system out of the company. The backups will also be backed up within the company. Besides, every kind of record on customer assets are deposited and backed up by the depository institution.
- b) Financial tables, records and negotiable instruments that are obliged to be kept by the current regulation will be deposited as printed or electronically in accordance with the 82. article of the Turkish Code of Commerce.

- c) Preventive measures taken towards possible operational risks including the ones towards financial and information infrastructure are mentioned in the section 5.3.
- d) Customers have been notified of the alternative communication channels and its continuity has been enabled.
- e) Emergency and contingency responsables supervise the functioning the of the communication channels of the company (phone, fax and electronic media, etc.) periodically and detects which communications channels are on/off. By using the available communication channels and mobile phones, the channels via which the company personnel can contact with the Company. If all the communication channels are off (phone, electronic media, fax), current communication channels are determined by contacting with Company personnel via mobile phone. In order to ensure the provision and continuity of alternative communication channels between the company and its employees, every Company employee will have every employee's phone number. Emergency and contingency responsables establish communication with CMB, BIST, CRA, Takasbank and other necessary state institutions and organizations. Besides, alternative operator lines have been provided for personnel access.
- f) The office in the Kağıthane Ofispark building, belonging to the partner of the Company, has been determined as the alternative Company headquarter. Address: Bağlar Cad. Kağıthane Ofispark C2 Blok No:5 Kağıthane, İstanbul
- g) Necessary data on the possible effects of the emergency and contingency to the other side will be collected and evaluated by the General Manager or an alternative responsible and necessary measures will be taken in line with this.
- h) In case of an emergency or a contingency, General Manager or the alternative responsible will immediately inform CMB of the measures taken.
- i) In case that the company decides not to continue its operations, customers will be informed of their access to their accounts and in case that it is decided to transfer these accounts to another company, customers will be informed of the issue via the latest communication tools.

C. Measures

The following measures are being taken against risks including power outages, fire, earthquake, sabotage, interruption in the technology infrastructure, along with the financial and information communication infrastructure:

- a) There is a generator in the building against any outages that may take place in the city's electric network. A UPS is positioned as to run the systems until the generator starts to operate when there is a power outage.

- b) In order to eliminate the risk of fire, smoke detectors and an alarm system connected to these detectors are being utilized within the Company. Fire alarm system has also been integrated with the building alarm system.
- c) Infrastructure components have been designed to minimize outage risks that may occur in technology infrastructure by evaluating them.
- d) Measures for preventing loss of lives (Building safety, training, establishment of first-aid and healthcare organization, establishment of correspondence organization, establishment of crisis management organization, establishment of damage and loss detection organization)

D. Making Notifications

- a. The personnel who is informed of the emergency and contingency by the emergency and contingency responsible coordinates and controls the process for notifying state security units, rescue units, regulatory and supervisory units of capital market, banks that are working with, insurance companies, institutions from which outsourced service is provided and other relevant institutions and organizations of the emergent emergency and contingency depending on the risk and damage level and the process for requesting help, if needed.
- b. In case of causes that emerge due to inappropriate operation of equipment and/or software exist due to any reason although there is no problem in the equipment and/or software in the Company workplace, taking measures necessary to realize the processes via other communication methods is ensured by the emergency and contingency responsible.
- c. In case that the company headquarter in which it operates cannot be used, employees are gathered in the alternative workplace specified in the Article 5.2-f and operations are continued from this workplace. This change in the company headquarter is announced to customers, suppliers and other relevant persons immediately.

E. Points of Contact and Their Contact Information

AMBULANCE	112	
FIRE DEPARTMENT	110	
POLICE EMERGENCY	155	
GENDARME EMERGENCY	156	
WATER AND SEWERAGE FAILURE	185	
POWER FAILURE	186	
GAS FAILURE	187	
GOVERNORSHIP OF ISTANBUL	179 (212) 455 59 00	
CRA ISTANBUL	(212) 334 57 00	(212) 334 57 57

CMB ANKARA	(312) 292 90 90	(312) 292 90 90
ISTANBUL	(212) 334 55 00	(212) 334 56 00
TAKASBANK POWER HOUSE	(212) 315 25 25	(212) 315 25 26
BORSA İSTANBUL	(212) 298 21 00	
ISTANBUL METROPOLITAN MUNICIPALITY 621 17 39		(212) 635 01 00 (212)
GAYRETTEPE FLORENCE NIGHTINGALE HOSPITAL		(212) 288 3400
ACIBADEM ETİLER	(212) 283 03 33	(212) 283 54 84
AMERİKAN HOSPITAL	(212) 444 3 777	(212) 311 21 90
CIVIL DEFENSE	(212) 574 58 80	
İŞ YATIRIM MENKUL DEĞERLER A.Ş.	(212) 350 20 00	
T. İŞ BANKASI A.Ş.		(212) 316 00 00
Başaran Nas SMMM (PwC Turkey)		(212) 355 58 26
Risk Aktif Consultancy		(216) 327 00 39
MS Bilgisayar		(532) 382 98 18

F. Resolution of Problems and Initiation of Studies

- a) An emergency and contingency is first tried to be resolved via the facilities of the Company. Measures that are taken during the studies are primarily towards personnel and customer safety.
- b) In cases where the facilities of the company are not sufficient to eliminate the emergency and contingency, emergency and contingency responsible determines the public bodies and/or private institutions to request for help.
- c) Emergency and contingency responsible prepare and submit a report demonstrating how the effects of the emergency and contingency may be eliminated via the Company facilities or by getting external help and how long it may take to the Board of Directors. According to the report approved by the Board of Directors, actions that are necessary to eliminate the emergency and contingency are performed.
- d) Emergency and contingency responsible bears the authority to take necessary actions without the approval of the Board of Directors when a latency in approval may result in negative consequences and/or when the Board of Directors cannot be contacted.

6. UPDATE AND NOTIFICATION

This regulation is sent to CMB after its validity is confirmed by the Board of Director's decision. If people responsible from executing the emergency and contingency plan are replaced, new responsible will be assigned by the Company Board of Directors, necessary notifications will be made, and a new version of this regulation will be issued reflecting the said replacement.

Every year, emergency and contingency responsible checks the currency of the Regulation and notifies the Board of Directors if s/he sees something necessary to be changed. If the Board of Directors considers this change to be appropriate, these necessary changes are made to the Regulation.

The Company is responsible from informing the customer it provides service of the business continuity and the relevant workflow procedures in cases of emergency and contingency. The said notification is included on the webpage of the Company.

7. VALIDNESS

This regulation becomes valid upon the approval of the Board of Directors.