

ZORLU HOLDING SUPPLIER CODE OF CONDUCT

As Zorlu Holding A.Ş.,¹ we consider the compliance of our suppliers, that we consider as important business partners within all Zorlu Group Companies², with environmental, social and ethical standards and principles accepted on an international platform.

When choosing our suppliers, we take into account their compliance with Zorlu Holding Supplier Code of Conduct (“Code of Conduct”), which we have issued in the light of all applicable national laws and regulations, in particular the International Labor Organization (ILO) and United Nations (UN) Conventions. We undertake to inform, raise awareness and to organize trainings where deemed necessary, in order to ensure compliance of our suppliers with the Principles.

As Zorlu Holding employees, we are entitled to make suppliers visits to be performed by Internal Audit-Internal Control Teams or third-party auditors in order to audit the compliance of our suppliers with the rules. In this context, we expect our suppliers to share in a transparent manner the documents that comply with the principles when required. In the case it is detected that such rules are violated, Zorlu Holding shall reserve the right to claim for any kind of damage and compensation, as well as to suspend or cancel the existing business contract.

Zorlu Holding Supplier Code of Conduct covers the entire purchasing operations of all Zorlu Group Companies and include the basic code of conduct expected from our suppliers. We expect our suppliers to convey the Principles to their own supply chains and to have the Principles applied by their suppliers.

Prevention of Child Labor and Forced Labor

- No child labor should be employed under any circumstances. Within the scope of Article 138 of the International Labor Organization Convention, the minimum working age has been determined as 15 and for some developing countries, this has been defined as 14. Employees under the minimum age fall under the definition of child workers.
- The training of young employees older than the minimum working age should not be precluded and these persons should not be employed in dangerous tasks.
- Work should be voluntary. No worker should be made to work by force or mandatorily.
- No worker should be employed without any assurance.
- The payment of debts by labor force will not be accepted under any circumstances.

¹ The Zorlu Group Supplier Code of Conduct covers all Zorlu Group Companies, and the document cannot be updated/modified other than with the information of Zorlu Holding Secretary of Sustainability, Zorlu Holding Supply Chain Working Group Leader and the Corporate Governance Working Group Leader.

²Zorlu Group Companies and Zorlu Holding A.Ş. and Zorlu Holding A.Ş., refer to the entire subsidiaries in which Zorlu Holding A.Ş. directly or indirectly holds the voting or management rights or where it holds the majority of the voting rights, among its own shares, by relying on a single agreement, solely or together with other shareholders or partners or which by other means keeps under its control.

Prevention of Discrimination

- Our suppliers should implement a “zero tolerance” policy against all kinds of discrimination within the work environment. In the work environment and during the recruitment process as well as in applications such as training, promotion and those related retirement processes, direct or indirect discrimination based on gender, age, religion, race, sect, social status, physical structure, ethnicity, nationality, political opinion, sexual orientation, pregnancy, political opinion or other reasons must not be tolerated.

Humane Treatment

- Our suppliers are obliged to provide their employees with an environment not containing sexual harassment and abuse, mental or physical pressure, rough and inhumane treatment, verbal abuse and other kinds of threats.
- Equitable behavior is necessary in all business relationships in accordance with fundamental moral and humane standard of judgments.

Remuneration

- A remuneration in accordance with the minimum wage should at least be defined for the employees, all fringe benefits are to be in accordance with the laws and regulations and payments should be made regularly and in a timely manner.

Working Hours

- Our suppliers must comply with the applicable laws and agreements regarding their maximum working hours and provide their employees with appropriate rest periods and adequate leave opportunities.

Occupational Health and Safety

- A healthy, hygienic and safe work environment should be provided to the employees.
- Necessary measures should be taken to prevent occupational accidents and occupational diseases and employees should be provided with regular occupational health and safety trainings to raise awareness and preventive actions should be taken by means of workplace policies, procedures and management systems to be issued.

Environment

- All relevant laws, regulations and legislation regarding the environment (including all laws on air emissions, wastes, wastewater and chemicals) should be abided by.
- Efforts should be made to reduce carbon emissions and the consumption of natural resources and to increase the amount of recycled waste.

Ethics

- No gifts should be given and accepted to facilitate business operations and no form of bribery and corruption should be allowed and tolerated.
- Situations that will cause a conflict of interest to occur should be avoided.
- No attempts should be made with the aim of distorting, preventing or limiting competition.
- The intellectual property rights of business partners should be protected.
- Our suppliers and/or employees can call the Ethical Principles Hotlines (etik@zorlu.com), (02124562323- 08502262323) in the case they encounter such situations and when any observation or doubt is in question in relation to this. It is essential that the identity of the disclosing employees/persons are kept confidential within the framework of legal/statutory and administrative requirements.
- The Committee of Ethics established by the Board of Directors is authorized and responsible for the evaluation and resolution of complaints, notices and claims received through the Notification Lines. In this sense, the information conveyed in relation to violation on the Principles is evaluated by Zorlu Holding General Directorate of Audit.