

OLGUN CELIK SUPPLY CHAIN COMPLIANCE POLICY

PURPOSE AND SCOPE

The purpose of Olgun Celik's Supply Chain Compliance Policy is to ensure that the company adheres to high ethical standards, international norms, and local regulations in its relationships with business partners, suppliers, and all third parties. This policy establishes the principles and standards that must be followed throughout the supply chain process by sharing Olgun Celik's core values with its business partners.

DEFINITIONS

- **Business Partners:** Suppliers, distributors, dealers, contractors, authorized services, and other third parties acting on behalf of the company.
- **Human Rights:** The right of all people to live equally and with dignity, regardless of race, gender, religion, language, age, nationality, and other differences.
- **Environment and Sustainability:** Protection of natural resources, environmentally conscious production, and industrial activities.
- **Corruption, Bribery, and Money Laundering:** Efforts by any individual or organization to gain illicit profit.
- **Sanctions:** International sanctions imposed on certain countries and individuals.
- **UN (United Nations):** A global organization consisting of 193 member countries aimed at promoting international peace, security, human rights, and development.
- **UN Guiding Principles on Business and Human Rights:** A set of guidelines that outline the standards businesses and governments should follow to ensure respect for human rights in the business world and emphasize the responsibilities for addressing human rights violations.
- **UN Global Compact:** A commitment agreement encouraging companies to align with universal principles in areas such as human rights, environment, labor rights, and anti-corruption.
- **ILO (International Labour Organization):** An agency of the United Nations that sets international labor standards and works to protect the rights of workers and improve working conditions.

- **ILO Declaration on Fundamental Principles and Rights at Work:** A declaration that guarantees workers' basic rights, based on principles such as freedom from forced labor, child labor, discrimination, and the right to organize.
- **Conflict Minerals:** Minerals (tin, tantalum, tungsten, gold, and lithium) that could finance conflicts and contribute to human rights violations.

Before starting a relationship with a new business partner, the financial stability, technical competence, legal compliance, and ethical stance of the supplier or partner are evaluated. Olgun Celik reserves the right to conduct audits when necessary and takes corrective actions in case of non-compliance.

GUIDING PRINCIPLES FOR BUSINESS PARTNERS

- **Compliance with Legal Regulations:** All business partners must comply with all applicable legal regulations, occupational safety rules, environmental laws, and human rights standards during their operations.
- **Human Rights:** Olgun Celik expects its business partners to respect human rights and adopt a zero-tolerance policy towards violations such as forced labor, child labor, discrimination, violence, harassment, and others. Based on ILO Conventions, the Universal Declaration of Human Rights, UN Business and Human Rights Guiding Principles, and the UN Global Compact, Olgun Celik expects business partners to implement a zero-tolerance policy regarding slavery and human trafficking.
- **Child Labor and Forced Labor:** Child labor and forced labor are strictly prohibited under any circumstances.
- **Compliance with Labor Laws:** Wages, working hours, and other working conditions must comply with the labor laws of the relevant country.
- **Diversity, Inclusion, and Equality:** Business partners must provide equal opportunities among their employees, respect the differences of each individual, and create an environment free from discrimination. They are also expected to develop and implement policies that prevent discrimination based on factors such as gender, race, ethnicity, age, or disability.
- **Occupational Health and Safety:** Business partners must provide a safe and healthy working environment, comply with legal regulations, and take all necessary safety measures. They must immediately address unsafe conditions or behaviors and reduce risks accordingly.

- **Environmental Sensitivity:** Business partners should take measures to avoid risks to human life and the environment, limit the environmental impact of their operations, and use resources efficiently. All processes, facilities, and production sources used by business partners must comply with the applicable legal requirements and standards regarding fire safety and environmental protection. Partners must engage in activities that improve and maintain environmental sensitivity, especially concerning GHG emissions, energy efficiency, renewable energy, water quality and consumption, air quality, waste management, resource management, and the use of environmentally friendly products.
- **Anti-Corruption, Bribery, and Money Laundering:** Business partners agree to comply with anti-corruption laws in force. In particular, business partners should ensure that their employees, subcontractors, or representatives do not offer, promise, or give any preferential treatment in exchange for business advantages. These rules also apply to third parties involved in a contract with Olgun Celik. Business partners must adhere to regulations preventing money laundering.
- **Conflict of Interest:** No personal interests should influence any action or decision made by business partners. Any potential conflict of interest must be reported to higher authorities according to the business ethics policies of the partners and should be immediately communicated to Olgun Celik.
- **Intellectual and Industrial Property Rights:** Business partners must respect the intellectual and industrial property rights of third parties, such as patents, utility models, industrial designs, copyrights, and trademarks, during their activities and avoid any actions that could violate these rights or lead to unfair competition.
- **Complaint Mechanism:** A clear and transparent framework is followed to address, assess, and resolve complaints regarding the activities of the company or suppliers or the behavior of their employees. Any non-compliance can be reported via the “Complaint Mechanism” contact details available on the company website.
- **Conflict Minerals:** Olgun Celik avoids using conflict minerals in its operations. Business partners are also expected to follow the same policy.
- **Fair Wages and Benefits:** Business partners must provide fair wages and benefits to their employees.
- **Working Hours and Leave:** Business partners must comply with the applicable laws regarding working hours and leave rights.

Olgun Celik ensures transparency, ethical values, and compliance in all supply chain activities. Compliance with this policy and the principles within it is expected not only from Olgun Celik but also from all business partners. Ensuring compliance in the supply chain is a critical factor that supports the company's reputation and sustainability.

Olgun Celik reserves the right to review its relationship with a supplier in case of any violations of this policy.

The following channels may be used for reporting violations and communication:

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