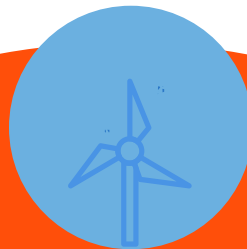


# SUPPLIER SELF-ASSESSMENT FORM



# INTRODUCTION

## Our Goal

Consumers, customers, and investors are anticipated to oversee and manage companies' sustainability impacts, covering environmental, social, and governance (ESG) dimensions, in addition to their economic influence, while the suppliers are also mandated to adhere to similar protocols. This entails communicating on sustainability matters, facilitating the integration of sustainability into critical decision-making processes, and motivating collaborative partners to leverage leading practices for enhancing the social and environmental performance of the existing supply chain.

The self-assessment process serves as a valuable instrument in supply chain sustainability mechanisms. It also helps suppliers evaluate and manage their ESG policies, practices, and performance. Addressing the issues outlined in this Form would provide suppliers with guidance on how to pinpoint their strengths and/or the areas where there is room for improvement, effectively evaluate and manage ESG risks and opportunities, and lay the groundwork for product innovation.

The Borusan Supplier Self-Assessment Form is designed to appraise the ESG performance of Borusan's current and prospective suppliers, determining their level of alignment with the Borusan Sustainable Procurement Approach. This initiative is aimed at assisting Borusan suppliers to efficiently manage ESG concerns and outline necessary steps for improvement.

Responses provided by suppliers will be assessed and securely stored by Borusan in compliance with the Personal Data Protection Law.

## Relevant Documentation and Definitions

Before filling in the Supplier Self-Assessment Form, it is essential that the suppliers have an understanding of:

**Borusan Sustainable Procurement Policy**, which outlines how sustainability issues embraced by Borusan are addressed from a procurement standpoint and highlights the considerations that Borusan suppliers need to observe in this context, and **Borusan Sustainable Procurement Supplier Guide**, which provides further insights and guidance on the implementation principles of the Policy.

**Borusan Sustainable Procurement Policy:** This Policy outlines Borusan's approach to sustainable procurement and its expectations regarding ESG issues for the entire Borusan ecosystem, encompassing Borusan employees, business partners, and suppliers.

**Borusan Sustainable Procurement Guide:** Complementing the Sustainable Procurement Policy, this guide delineates Borusan's expectations from its suppliers regarding the Sustainable Procurement Levels and Related Subtopics outlined in the Policy. It provides detailed information and guidance on the implementation steps of the Policy. The Guide is intended for all current and potential suppliers of Borusan.

### **Borusan Group Sustainable Procurement Code of Conduct:**

Borusan Group may engage in partnerships with suppliers who uphold and practice the behaviors outlined in the code of conduct, in the form of their business ethics. This document outlines the essential conditions for collaboration with Borusan. By endorsing this code of conduct, our suppliers pledge to integrate these behaviors into our procurement process. Failure to comply with these practices will result in the dismissal of the supplier.

**WE ARE THERE FOR  
OUR SUPPLIERS IN  
THEIR  
SUSTAINABILITY  
JOURNEY**

## ● Supplier Specific Sustainable Procurement Understanding

We consider the implementation, endorsement, and dissemination of our sustainability vision and commitments by our business partners to be crucial. To advance steadfastly in this direction, we have been devising our plans with due regard for our parent organization and subsidiaries, aiming to integrate the Sustainable Procurement Policy we have formulated, with our suppliers.

The understanding of "Sustainable Procurement," established within the Borusan framework, can be described as systematically incorporating four main focus areas (General Understanding of Sustainability, Governance Level, Environmental Level, and Social Level), along with related sub-headings and criteria groups, into organizational procurement decisions and long-term collaborations with suppliers.

Reflecting this understanding, Borusan's sustainable supply chain management is underpinned by the implementation of a procurement policy aligned with ESG topics and adherence to the pertinent criteria within the governance scope at the initial stage.

We prioritize the following: Ensuring that our partners integrate Sustainable Procurement into their business models,

- Encouraging our business partners to adopt Borusan's corporate sustainability approach,
- Motivating our business partners to adapt compliance principles to their own operations to meet the needs and expectations aligned with our customers' demands,
- Inspiring our business partners to undertake value creation model initiatives specific to sectoral high-risk topics in accordance with long-term goals.

At Borusan, our aim is to ensure that our solution partners comprehend the interconnectedness of environmental, social, and governance changes with the business landscape, and to advance together along our value chain, fostering a sustainable future.

In our journey towards a sustainable supply chain, we are dedicated to fostering collaborative partnerships with our suppliers. Through our Sustainable Procurement Policy and Borusan Sustainable Procurement Guide, we encourage our suppliers to join us in continuously enhancing their performance across environmental, social, and governance (ESG) levels, and to implement sustainable business practices.



## **We support our suppliers in this endeavor through: Collaboration**

We engage with our suppliers to enhance their understanding of ESG criteria, develop responsible business practices, and guide them through the steps necessary for compliance. As part of this effort, we will be sharing our expertise through on-site visits.

### **Support**

We assist our suppliers in aligning with the core principles and sub-principles of the Borusan Sustainable Procurement Policy, helping them identify required actions and achieve improved conditions promptly through the Sustainable Procurement Guide.

### **Prioritization**

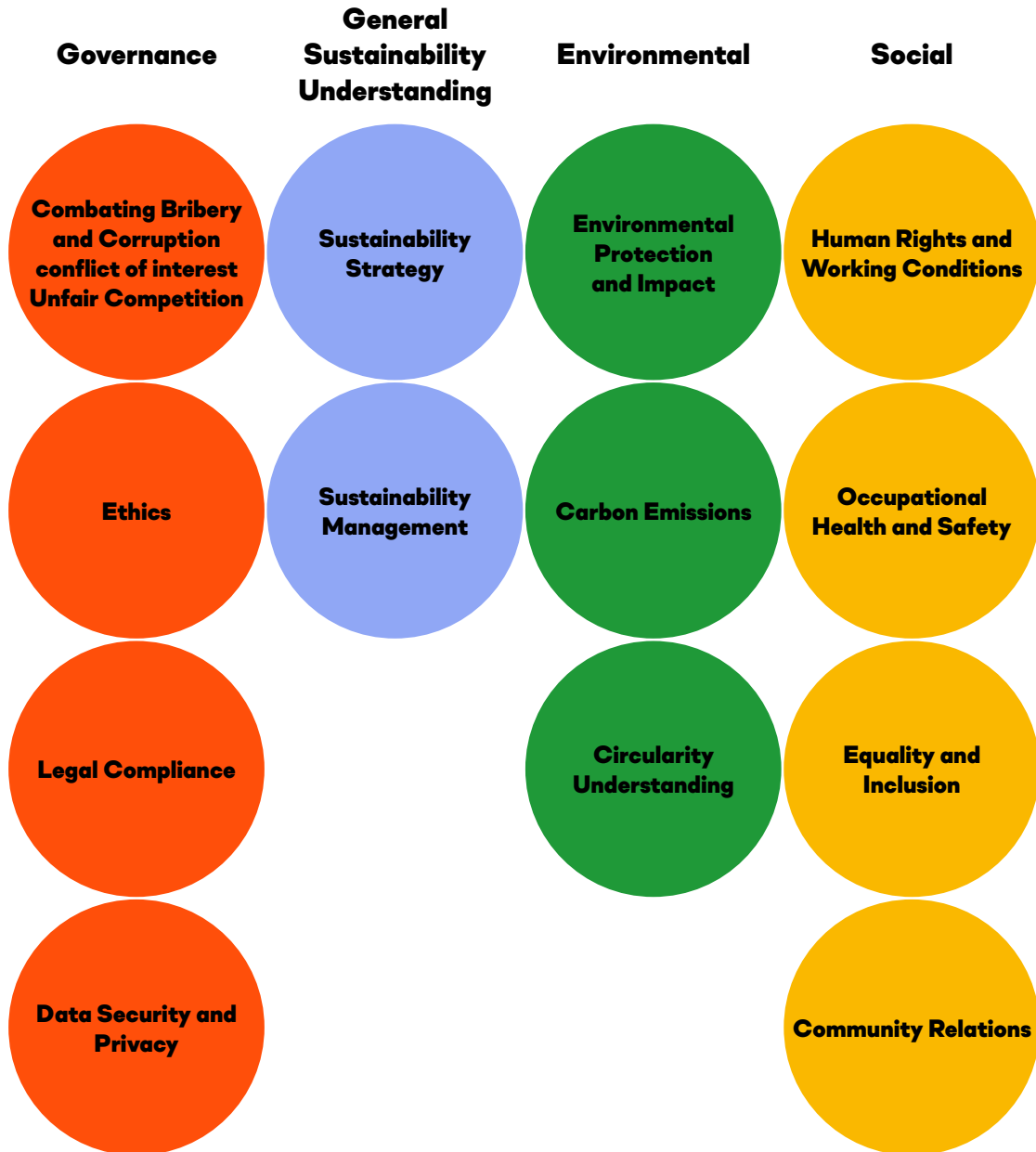
We assess our suppliers based on the environmental, social, and governance dimensions as well as the sub-principles outlined in the Borusan Sustainable Procurement Policy and their respective sectors. We identify high-level and medium-high risk ESG issues specific to each sector, and based on these analyses, we prioritize the key ESG dimensions and sub-principles with which our suppliers need to align.

### **Communication and Training**

To ensure our suppliers embrace the Borusan Sustainable Procurement Approach, we maintain regular communication with them. We provide recommendations for enhancing their ESG performance and help raise their awareness by providing tailored training content.

## Sustainable Procurement Levels and Related Subtopics

Through the Supplier Self-Assessment Form, Borusan requests current and potential suppliers to provide information on their experience across the four-level focus areas of **General Understanding of Sustainability, Governance, Environmental, and Social**. These areas align with the Borusan Sustainable Procurement approach and help evaluate suppliers' sustainability practices.

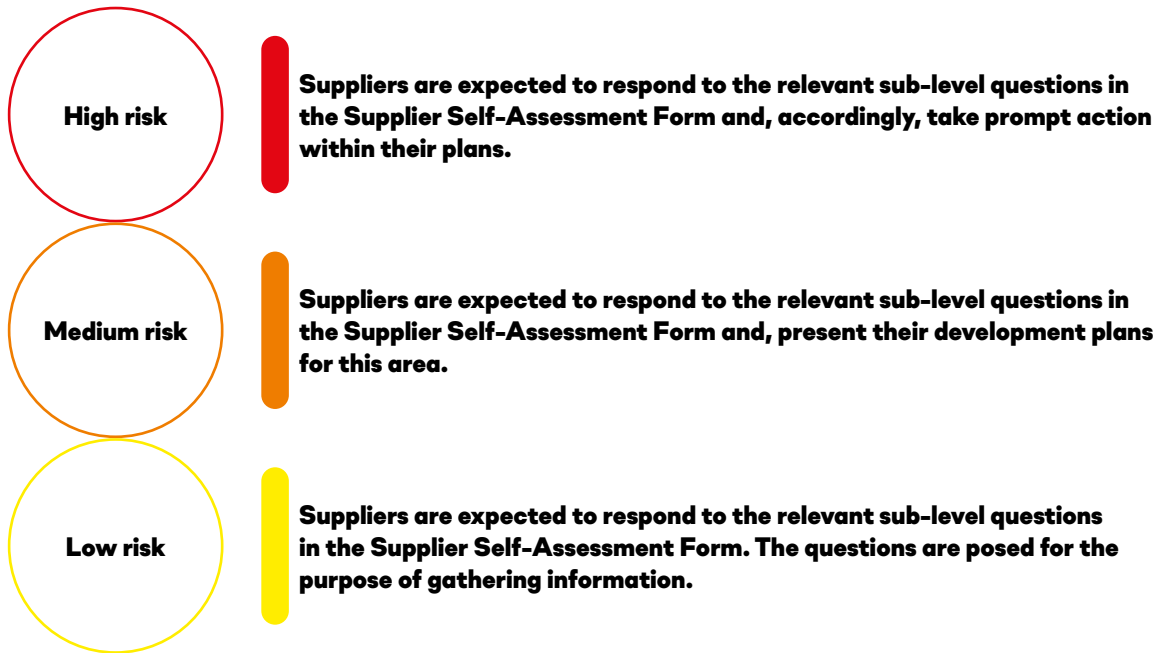


## ● Sustainability Risk-Based Sectoral Assessments

Ensuring alignment with the sector and ecosystem of our suppliers is paramount to Borusan's Sustainable Procurement Understanding. This is why, establishing the areas that entail specific risks for our suppliers to focus on under ESG headings within the context of their respective sectors and evaluating them based on these areas form the cornerstone of our Sustainable Procurement Understanding.

The Borusan Supplier Self-Assessment Form, which we require our suppliers to complete, is also developed and analyzed based on sector-specific risk assessment. All suppliers are mandated to respond to the "General Questions" and "General Understanding of Sustainability" sections in the form.

Furthermore, the risk-based assessment is conducted in view of the sectors in which our suppliers operate within the Environmental, Social, and Governance levels. These risks have been mapped according to the sub-criteria specified in the Environmental, Social, and Governance levels outlined in the Sustainable Procurement Policy and Guide. Suppliers are expected to take appropriate actions within the framework of high, medium, and low-risk areas and associated sub-criteria as defined in the table below.



We ensure that, before completing the assessment form, our suppliers comprehend and evaluate the environmental, social, and governance risks associated with the sector in which they operate using the Risk-Based Sectoral Assessment Framework.



## Risk-Based Sectoral Assessment Framework

			Subcontracted Service				Energy	IT - Communication	Vehicle Rental	Vehicle Rental	Production Consumables			
			Subcontracted Employees	Catering	Security	Agency Services	Fuel oil			Employee Transportation	Carboy Water	Printing	Office Consumables	Field Textiles
Environmental Level	Environmental Protection And Impact	Environmental Management Systems												
		Energy Efficiency & Renewable Energy												
	Carbon Emissions	Carbon Emission Release												
		Carbon Emission Reduction												
	Circularity Understanding	Waste												
		Product Design												
		Material Utilization												
Social Level	Human Rights and Working Conditions	Human Rights												
		Child Labor												
		Working Conditions												
		Forced and Compulsory Labor												
	Employee Wellbeing and Working Conditions													
	Equality and Inclusion													
	Community Relations													
Governance Level	Combating Bribery and Corruption, Conflict of Interest, and Unfair Competition													
	Ethics													
	Legal Compliance													
	Data Security and Privacy													

Below is an illustration for our suppliers that offer Employee Transportation services in the Vehicle Rental sector. All our suppliers can assess their sector-specific risks and requirements using this **example**.

### Environmental Level Risk Level

Environmental Management System	High
Energy Efficiency and Renewable Energy	High
Carbon Emission Amount	High
Carbon Emission Reduction	High
Waste Management	Low
Material Utilization	Low
Product Design	Low

For suppliers offering Employee Transportation services in the Vehicle Rental sector, at the Environmental Level,

#### High-risk areas:

- Environmental Management System
- Energy Efficiency and Renewable Energy
- Carbon Emission Amount
- Carbon Emission Reduction

#### Low-risk areas:

- Waste Management,
- Product Design,
- Material Utilization.

### Social Level Risk Level

Human Rights	High
Child Labor	High
Forced and Compulsory Labor	High
Working Conditions	High
Employee Health and Safety	High
Equality and Inclusion	Low
Community Relations.	Low

#### High-risk areas:

- Human Rights
- Child Labor
- Forced and Compulsory Labor
- Working Conditions
- Employee Health and Safety

#### Low-risk areas:

- Equality and Inclusion,
- Community Relations.

### Governance Level Risk Level

Combating Bribery and Corruption	High
Conflict of Interest	High
Unfair Competition	High
Ethics	High
Legal Compliance	High
Data Security	Low
Data Privacy	Low

#### High-risk areas:

- Combating Bribery and Corruption
- Conflict of Interest
- Unfair Competition
- Ethics
- Legal Compliance

#### Low-risk areas:

- Data Security
- Data Privacy.



# **SUPPLIER SELF- ASSESSMENT FORM**

# 1. General Questions

## 1.1. General Questions about the Company

Name of Supplier:

Tax Number:

Address:

Name of Contact Person:

E-mail Address of Contact Person:

Sector:

### Subcontracted Service

- ☐ Subcontracted Employees
- ☐ Catering
- ☐ Security
- ☐ Cleaning
- ☐ Agency Services

### Production Consumables

- ☐ Food, Water
- ☐ Publishing, Printed Media
- ☐ Office Consumables
- ☐ Field Textiles

### Energy

- ☐ Fuel Oil
- ☐ Electricity
- ☐ Natural Gas

### Vehicle Rental

- ☐ Vehicle Renting
- ☐ Employee Transportation
- ☐ Other (Please specify):

### IT - Communication

- ☐ Information Technologies

Supplier Contact Information (Phone number and e-mail address):

Self-Assessment Questionnaire Completed on:

Questionnaire Completed by (Name and Title):

Your personal data will be processed by Borusan Holding A.Ş., the data controller, for the purpose of contacting the supplier representative who has completed the Preliminary Information Form, based on the legal grounds that "Processing of data is necessary for legitimate interests" as laid down under Article 5 of the Personal Data Protection Law ("PDPL"). For the aforementioned purpose, your first and last name, contact details, the name of the company you represent, and your title information will be processed. Your data is collected in a physical environment using non-automated methods, as part of the data recording system. In the event of a legal dispute or when required by our legal obligations, your data will be shared with authorized organizations and agencies in accordance with the PDPL. To exercise your rights under Article 11 of the PDPL, you can contact our company using the methods specified in the Communiqué on the Principles and Procedures for The Request to Data Controller.

## 1.2. Company Size

Please choose the size category that best corresponds to your company based on the definitions provided below:

- ☐ **Small Scale Company:** *Number of employees less than 50 and/or annual sales revenue or financial balance sheet less than TL 8 million.*
- ☐ **Medium Scale Company:** *Number of employees less than 250 and/or annual sales revenue or financial balance sheet less than TL 40 million.*
- ☐ **Large Scale Company:** *Number of employees more than 250 and/or annual sales revenue or financial balance sheet more than TL 40 million.*

## 2. ESG Related Questions

### 2.1. General Understanding of Sustainability

#### A. Sustainability Strategy

1. Does the company have a sustainability strategy (a policy, program, or performance-oriented initiative designed to promote sustainability) that it has been implementing or plans to implement in the near future?

- ☐ **Yes**, we have an established company strategy.
- ☐ **Yes**, we are currently in the process of planning our strategy.
- ☐ **Yes**, we align with the strategy of our parent company.
- ☐ **No**, we haven't initiated any efforts in this direction as there is no market demand for it yet.
- ☐ **No**, we haven't taken any steps in this direction due to the absence of legal requirements.

2. Does the company produce a Sustainability/Social Responsibility Report?

- ☐ **Yes**, the company produces a sustainability report.
- ☐ **Yes**, the company produces a social responsibility report.
- ☐ **No**

*If yes, please provide the link to your report in the field below or submit the report to Borusan.*

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3. Does the company utilize reporting mechanisms, initiatives, and standards to share its sustainability disclosures?

- ☐ UN Global Compact Communication on Progress (COP)
- ☐ Carbon Disclosure Project (CDP)
- ☐ Global Reporting Initiative (GRI)
- ☐ ESG Rating Indices (S&P, Dow Jones, MSCI, Moody's, Sustainalytics, FTSE, Bloomberg, etc.)
- ☐ Integrated Reporting (IR)
- ☐ Task Force on Climate-Related Financial Disclosures (TCFD)
- ☐ Sustainability Accounting Standards Board (SASB)
- ☐ Sustainable Development Goals (SDGs)
- ☐ Responsible Steel

4. Does the company mandate sustainability requirements for its suppliers?

- ☐ Yes
- ☐ No

4.a. If yes, please specify the areas for which the requirements for suppliers are mandated.

- ☐ Combating bribery and corruption, conflict of interest, and unfair competition
- ☐ Ethics
- ☐ Data security and privacy
- ☐ Environmental protection and impact
- ☐ Carbon emissions
- ☐ Circularity understanding
- ☐ Human rights and working conditions
- ☐ Employee health and safety
- ☐ Equality and Inclusion
- ☐ Community Relations

## B. Sustainability Management

5. Is there a designated individual, department, or committee in the company overseeing sustainability matters?

- ☐ Yes
- ☐ No

*If yes, please provide details in the space provided below.*

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6. Who holds the highest-level responsibility for sustainability matters within the company?

- |   |  |
|---|--|
| <input type="checkbox"/> CEO              | <input type="checkbox"/> Chair of the Board of Directors |
| <input type="checkbox"/> CFO              | <input type="checkbox"/> Board of Directors Member       |
| <input type="checkbox"/> General Director | <input type="checkbox"/> Other (Please specify)          |

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## 2.2 Governance Level

### A. Combating Bribery and Corruption, Conflict of Interest, and Unfair Competition

7. Does the company have a Business Ethics policy?

- ☐ No
- ☐ Yes

7.a If yes, which of the following topics does the Business Ethics Policy cover? (You may select multiple options.)

- ☐ Combating Bribery and Corruption
- ☐ Conflict of Interest
- ☐ Unfair Competition
- ☐ Legal Compliance

*If yes, please provide the link to the policy in the field below or submit the policy to Borusan.*

---

8. Is training provided for company employees on any of the following topics?: Combating Bribery and Corruption, Conflict of Interest, Unfair Competition

- ☐ Yes
- ☐ No

### B. Ethics

9. Does the Company have a Code of Conduct / a set of working principles or policy that incorporates ethical issues?

- ☐ Yes
- ☐ No

*If yes, please provide the link to the policy in the field below or submit the policy to Borusan.*

---

10. Is any training provided for company employees on ethical issues?

- ☐ Yes
- ☐ No

11. Does your company provide a grievance mechanism through which affected stakeholders and rights holders can file complaints and ask the business to address them.

- ☐ **Yes**, we have a grievance mechanism that is available to our employees as well as external stakeholders (e.g. suppliers, communities) and our entire supply chain.
- ☐ **Yes**, we have an internal grievance mechanism that is only open to employees of our company.
- ☐ **No**

## C. Legal Compliance

12. Over the past year, has the Company experienced any violations regarding Combating Bribery and Corruption, Conflict of Interest and Unfair Competition, Environment, Occupational Health & Safety, Social Insurance, Competition Law, and Personal Data Protection?

☐ Yes

☐ No

13. Over the past year, has the Company experienced any violations regarding Ethics?

☐ Yes

☐ No

13a. Is any training provided for company employees on any of the above topics?

☐ Yes

☐ No

13b. Does the Company have policy documents addressing the above topics?

☐ Yes

☐ No

If yes, please provide the link to the relevant policy in the field below or submit the documents in question to Borusan.

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## D. Data Security and Privacy

14. Does the company have a Data Security and Privacy policy?

☐ Yes

☐ No

*If yes, please provide the link to the policy in the field below or submit the policy to Borusan.*

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## 2.3 Environmental Level

### A. Environmental Protection and Impact

#### A.1. Environmental Management Systems

15. Does the company have an Environmental Management System in place?  
(E.g. ISO 14001)

- ☐ Yes  
☐ No

*If yes, please provide the link to the certificate in the field below or submit the certificate to Borusan.*

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*If no, please share your plans to establish an Environmental Management System with Borusan.*

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16. Does the company have an Environmental Policy?

- ☐ Yes  
☐ No

16.a If yes, please indicate which environmental performance criteria are covered by the relevant policy. (You may select multiple options.)

- ☐ Greenhouse Gas Emissions  
☐ Energy Efficiency  
☐ Air Quality  
☐ Water Consumption  
☐ Resource Management and Waste Reduction  
☐ Biodiversity

*Please provide the link to the policy in the field below or submit the policy to Borusan.*

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17. Does the company have an Energy Management System in place?

- ☐ Yes  
☐ No

*If yes, please provide the link to the certificate in the field below or submit the certificate to Borusan.*

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18. Has the company received any environmental fines or warnings over the past 3 years?

- ☐ Yes  
☐ No

18.a If yes, please specify the scope of fines/warnings received.

- ☐ Air Pollution  
☐ Water Management  
☐ Waste Management

## A.2. Energy Efficiency and Renewable Energy

19. Is the Company's primary energy consumption (oil, coal, natural gas) monitored and reported?

- ☐ Yes
- ☐ No

20. Is the Company's electricity consumption monitored?

- ☐ Yes
- ☐ No

21. Does the Company generate and/or use renewable energy?

- ☐ Renewable energy is used
- ☐ Renewable energy is generated
- ☐ No

22. Does the Company have any environmental performance-oriented targets?

- ☐ Yes
- ☐ No

22.a If yes, are environmental performance improvements/ development monitored annually?

- ☐ Yes
- ☐ No

23. Does the Company carry out activities designed to increase energy efficiency?

- ☐ Yes
- ☐ No

23.a If yes, please provide further details on your company's energy efficiency activities in the field below.

[illegible]

## B. Carbon Emissions

### B.1. Carbon Emission Release

24. Does the Company report annually on the amount of carbon emissions resulting from its activities at the corporate level?

- ☐ Yes
- ☐ No

24.a If yes, please indicate which scopes are reported.

- ☐ Scope 1 Greenhouse Gas Emissions
- ☐ Scope 2 Greenhouse Gas Emissions
- ☐ Scope 3 Greenhouse Gas Emissions

24.b What elements are included in the Scope 3 Greenhouse Gas Emissions quantification?

- ☐ Purchased goods and services
- ☐ Capital goods
- ☐ Fuel and energy related activities
- ☐ Transportation and distribution of production input materials
- ☐ Waste generated in operations
- ☐ Business travels
- ☐ Employee commutes
- ☐ Upward leased assets
- ☐ Transportation and distribution of the final product
- ☐ Processing of the products sold
- ☐ Use of products sold
- ☐ End-of-life treatment of products sold
- ☐ Leased assets
- ☐ Franchises
- ☐ Investments

24.c If yes, please indicate which calculation methodology is used.

- ☐ GHG Protocol
  - ☐ ISO 14064-1 or ISO 14064-2
  - ☐ Other (Please specify)
- 

24.d. If yes, does the company use independent assurance/inspection services for the annually reported emission data to verify them?

- ☐ Yes
- ☐ No

24.e. If yes, please indicate the scope of verification:

- ☐ Scope 1 Greenhouse Gas Emissions
- ☐ Scope 2 Greenhouse Gas Emissions
- ☐ Scope 3 Greenhouse Gas Emissions

24.f. What is the company's corporate carbon emission amount? (tCO<sub>2</sub>)

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## B.2. Carbon Emission Reduction

25. Does the Company have a short-term (1-5 years) target to reduce carbon emissions?

☐ Yes

☐ No

*If yes, please specify your target:*

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*If yes, please indicate the main activities you will carry out to achieve the target:*

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25.a Does the Company have a medium-term (5-15 years) target to reduce carbon emissions?

☐ Yes

☐ No

*If yes, please specify your target:*

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*If yes, please indicate the main activities you will carry out to achieve the target:*

---

25.b Does the Company have a long-term (15-35 years) target to reduce carbon emissions?

☐ Yes

☐ No

*If yes, please specify your target:*

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*If yes, please indicate the main activities you will carry out to achieve the target:*

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## C. Circularity Understanding

### C.1. Waste

26. Does the Company have a waste management procedure in place?

☐ Yes

☐ No

*If yes, please provide a description of your waste management procedure in the field below.*

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27. Are recycling activities carried out for the wastes generated by the Company (or its production operations, if any)?

- ☐ Yes  
☐ No

*If yes, please provide a description of your recycling activities in the field below.*

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28. Does the company have a "zero waste" target?

- ☐ Yes  
☐ No

## C.2. Product Design

29. Are products with recycled or recyclable product labels preferred in the procurement of products?

- ☐ Yes  
☐ No

*If yes, please provide a description of your relevant activities in the field below.*

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30. Is a circularity approach adopted in the design of the products owned/ manufactured by the Company? (Eco-friendly, recyclable, low carbon emission, etc.)

- ☐ Yes  
☐ No

*If yes, please provide a description of your relevant activities in the field below.*

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### C.3. Material Utilization

31. Is the Company implementing any projects aimed at reducing the utilization of raw materials and/or materials?

- ☐ Yes  
☐ No

*If yes, please provide a description of your relevant activities in the field below.*

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## 2.5 Social Level

### A. Human Rights and Working Conditions

32. Does the Company have a policy covering human rights and working conditions?

- ☐ Yes  
☐ No

32.a If yes, please indicate which issues are covered by the relevant policy. (You may select multiple options.)

- ☐ Human Rights  
☐ Child Labor  
☐ Forced and Compulsory Labor  
☐ Working Hours  
☐ Remuneration and Fringe Benefits  
☐ Working Standards  
☐ Harassment and Discrimination  
☐ Freedom of Association and Collective Bargaining

*Please provide the link to the policy in the field below or submit the policy to Borusan.*

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32.b If yes, is any training provided for company employees on human rights and working conditions?

- ☐ Yes  
☐ No

## B. Employee Health and Safety

33. Does the Company have a formal health and safety policy that complies with national laws, industry requirements, and international standards?

- ☐ Yes  
☐ No

*Please provide the link to the policy in the field below or submit the policy to Borusan.*

34. Does the Company have a health and safety management system in place?

- ☐ Yes  
☐ No

*Please provide the link to the policy in the field below or submit the policy to Borusan.*

35. Does your company organize projects aimed at preventing work accidents, near misses, or occupational diseases?

- ☐ Yes  
☐ No

*If yes, please provide a description of your relevant activities in the field below.*

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35.a Does your company have an inspection mechanism to ensure compliance with occupational health and safety measures?

- ☐ Yes  
☐ No

*If yes, please provide a description of your relevant activities in the field below.*

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### C. Equality and Inclusion

36. Does the Company have policies in place to prevent discrimination in recruitment, salary, social benefits, dismissal, and/or retirement practices within the scope of equality, diversity, and inclusion?

- ☐ Yes
- ☐ No

37. Does the company implement projects that promote gender equality and women's employment? (e.g., additional maternity leave, lactation breaks, childcare facilities, breastfeeding rooms, etc.)

- ☐ Yes
- ☐ No

38. Please provide details of any additional activities undertaken by the Company to promote equality, inclusion, and non-discrimination in the space below. (Please leave this field blank if there are no such activities.)

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## D. Community Relations

39. Does the Company engage in social responsibility projects that contribute to social development?

- ☐ Yes
- ☐ No

39.a If yes, please describe the Company's social responsibility projects in the space below.

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Are there any sector-specific improvement suggestions you would like to share with Borusan?  
If yes, please provide your suggestions in the field below.

[illegible]



# BORUSAN GROUP SUSTAINABLE PROCUREMENT CODE OF CONDUCT

Within the realm of all services rendered through or for Borusan, we hereby acknowledge, declare, and commit to the following:

1. 1. Abide by the applicable legislation,
2. 2. Uphold the fundamental human rights of our employees,
3. Refrain from violating Borusan trademarks and other intellectual property rights, abstain from unfair competition, and avoid involvement in the manufacturing, distribution, storage, or sale of counterfeit Borusan products or third-party products infringing Borusan's intellectual property (including Borusan trademarks),
4. Avoid employing children younger than 15 years of age or below the minimum working age established by the national legislation where it is higher than 15 as mandated by the International Labor Organization, and the provisions of relevant local legislation
5. Ensure that all employees, intermediaries, representatives, subcontractors, and other parties engaged or to be engaged in connection with Borusan-related business commit to adhering to Borusan's ethical and compliance standards as well as the requirements outlined in the Sustainable Procurement Policy,
6. Adhere to the provisions laid down under the applicable legislation including the Personal Data Protection Law and Competition Law,
7. Establish and maintain effective internal control processes to prevent or identify any unlawful conduct by employees or other involved parties, and implement new measures as needed,
8. Comply with all applicable laws and contractual obligations, including assisting in any investigation conducted by Borusan concerning violations of Borusan's Business Principles and Business Ethics Practices (Orange Guide) by Borusan employees or any breaches of applicable laws and contracts by us; and make sure that Borusan has access to all relevant documents pertaining to compliance with applicable laws and contracts concerning direct or indirect product supply and service provision to Borusan and the Borusan Group Sustainable Procurement Code of Conduct,
9. Ensure that our sub-suppliers adhere to Borusan's Business Principles and Business Ethics Practices (Orange Guide) and the requirements of the Sustainable Procurement Policy, while also upholding non-discrimination principles in the selection and treatment of sub-suppliers,
10. Enforce a zero tolerance policy against bribery, prohibiting all forms of corruption, bribery, facilitation payment, unlawful kickbacks, and embezzlement, including payment to a public official or gain that is otherwise obtained, for the purpose of influencing the decision-making process where such an act is against the laws; and strictly forbid any promise, offer, endorsement, granting, giving, or acceptance of anything of value, directly or indirectly through a third party, to any person for the purpose of referring business or otherwise obtaining an improper benefit,
11. Ensure that none of our representatives or employees would offer or provide money, non-cash gifts, unlawful kickbacks, or entertainment to any BORUSAN employee for any improper purpose, such as influencing their behavior,
12. Maintain accurate and comprehensive books and records of all transactions and expenditures, refrain from engaging in false or misleading accounting practices, including but not limited to the creation of "slush funds" or similar improper financial practices, and avoid falsifying transaction documents,
13. Fulfill, without fail, all obligations prescribed by provisions of the applicable labor laws, including but not limited to working hours, overtime, weekends, national holidays, and public holidays,

14. Acknowledge that any documents related to BORUSAN's information security obtained or encountered during the provision of contracted services are confidential and will not be disclosed to unauthorized individuals without written authorization,
15. Ensure that representatives, employees, or subcontractors act in compliance with legal obligations when protecting and processing personal data of identified or identifiable individuals, which has been disclosed to them within the scope of a contract or in any other way, and that they assume full responsibility for such acts,
16. Recognize that BORUSAN employees or authorized third parties may inspect the quality and compliance of work, and ensure that corrective action is taken or necessary changes are implemented in light of inspection findings,
17. Commit to the principle of equal treatment for employees in all aspects,
18. Ensure that representatives or employees refrain from involvement in terrorism or similar unlawful acts,
19. Affirm that our employees enjoy their right to freely form, join, and leave trade unions and associations of trade unions without prior authorization or any imposition of limitations by our company,
20. Ensure that our employees are entitled to exercise all their rights under the applicable legislation pertaining to collective bargaining agreements concluded between the worker's union and either the employer's union or a non-unionized employer for the purpose of regulating the issues related to the establishment, content, and termination of employment contracts, without any imposition of limitations by our company,
21. Commit to fulfilling all obligations outlined in the national and international health and safety standards and the occupational health and safety regulations, along with relevant secondary legislation and official regulations in an effort to maximize the prevention of occupational accidents and ensure a safe working environment for our employees; ensure that our employees exercise all their rights as mandated by the applicable social security legislation; and provide training opportunities for our employees to enhance their safety awareness and skills,
22. Ensure thorough and timely compliance with all responsibilities and obligations assigned to us as the employer, as per applicable labor law and social security legislation, including provision of lawful and realistic remuneration and payroll,
23. Take utmost care to offer proper working conditions, preventing any ill-treatment of our employees,
24. Act in strict accordance with applicable environmental legislation across all sectors we operate, and submit all necessary authorizations, documents, certificates, and other required paperwork,
25. Acknowledge that any violation of these rules shall grant BORUSAN the right to unilaterally terminate the contract immediately, without prejudice to its legal rights.

The obligations outlined for the suppliers in the foregoing Code of Conduct shall be applicable throughout the duration of their commercial relationship with BORUSAN whereas their commitments concerning confidentiality and personal information security shall remain in effect indefinitely.

Supplier's Authorized Representative

Stamp/Signature

Date