SUPPLIER CODE OF CONDUCT

1. PURPOSE

The purpose of this document is to set out the ethical, social, environmental and legal standards with which all suppliers within **GAZİ METAL's** supply chain must comply.

GAZİ METAL, undertakes to act in accordance with national legislation as well as internationally recognised standards, in particular the principles of the International Labour Organisation (ILO) , and expects the same approach from its suppliers.

2. SCOPE

- It covers all direct and indirect suppliers
- Subcontractors
- service providers.

Suppliers are obliged to ensure that these rules are also applied within their own supply chains.

3. LEGAL COMPLIANCE

Suppliers must comply with the laws, regulations, rules and agreements in force in the countries in which they operate.

4. HUMAN RIGHTS AND WORKING CONDITIONS

4.1. Prohibition of Child Labour

It is prohibited to employ persons below the legally prescribed minimum age in the country where the work is carried out, and under no circumstances may children under the age of 15 be employed. Special protection should be provided for young workers.

4.2. Prohibition of Forced and Compulsory Labour

No employee may be made to work by force, in return for debt or under duress; employees' identity documents must not be withheld. Employees have the freedom to leave their jobs.

4.3. Prohibition of Discrimination

Employees must be treated fairly and without discrimination at all levels, regardless of race, nationality, gender, sexual orientation, social and personal circumstances, health status, marital status, religion, personal beliefs, age, etc.

4.4. Prohibition of Harassment and ill-treatment

Physical, psychological, verbal harassment, and emotional or physical coercion are strictly prohibited.

4.5. Conflict Minerals

Suppliers providing components containing tin, tantalum, tungsten and gold (3TG) – metals classified as 'conflict minerals' In accordance with the 'OECD Guidance on Responsible Supply Chains for Minerals

from Conflict-Affected and High-Risk Areas', they must ensure that these metals are sourced exclusively from sources not associated with conflict.

4.6. Working Hours and Remuneration

Working hours must be within the legal limits and wages must be at least at the statutory minimum wage level. Overtime should be based on voluntary participation, and its remuneration must comply with the relevant legislation.

4.7. Trade Union Rights

Within the framework of local legislation, respect must be shown for all employees' legal rights regarding freedom of association and collective bargaining.

5. OCCUPATIONAL SAFETY AND HEALTH

All occupational health and safety standards set out in local legislation must be met by our Suppliers, and all our Suppliers must ensure a healthy and safe working environment for their employees, identify and control risks, and provide employees with the necessary training. All suppliers and subcontractors working at Gazi Metal's facilities must comply with Gazi Metal's health and safety regulations.

6. ENVIRONMENTAL CARE

Suppliers should strive to make the best possible use of resources and minimise pollution; they should design and develop their products taking into account their environmental impact and their potential for reuse or recycling; and they should manage waste in the best possible way;

Suppliers should aim to increase the use of renewable energy sources and step up their energy efficiency efforts.

Suppliers must minimise the impact of their activities on the local ecosystem, protect biodiversity and, where animals are involved in their processes, comply with ethical standards relating to animal welfare.

Suppliers are expected to measure and report their greenhouse gas emissions and set specific targets for reducing their carbon footprint. **GAZİ METAL** reserves the right to give priority to suppliers who are making progress in this field.

7. ETHICAL BUSINESS CONDUCT

7.1. Bribery and Corruption

At **GAZİ METAL**, it is strictly prohibited for any employee to be involved in any act relating to bribery, corruption or money laundering. Accordingly, Suppliers must also ensure that they do not engage in any acts relating to bribery, corruption or money laundering, and must comply with all applicable anti-bribery laws and regulations.

7.2. Gifts and Hospitality

Suppliers are strictly prohibited from providing gifts, payments, meals, entertainment or similar items that could influence the work-related decisions of **GAZİ METAL** employees or give the impression that they might do so. **GAZİ METAL** employees may accept gifts of symbolic value, such as plaques and

certificates, presented at meetings or seminars attended on behalf of the company; diaries, calendars, pens, and products bearing the company logo, as well as food and refreshments which, by tradition, would be considered impolite to decline. The giving of any kind of cash-equivalent gift is prohibited.

7.3. Conflict of Interest

Suppliers must immediately notify **GAZİ METAL** if they have any family or friendship ties, or any other relationship that could give rise to a conflict of interest, with a **GAZİ METAL** employee with whom they are working.

7.4. Data Protection (KVKK / GDPR)

Suppliers are obliged to process, protect and ensure the confidentiality of personal data relating to **GAZİ METAL** employees, customers or business partners to which they have access within the scope of their business relationship, in accordance with the Personal Data Protection Law No. 6698 and relevant legislation. In the event that data is accessed by unauthorised persons, **GAZİ METAL** must **be** notified immediately.

7.5. Cyber Security

Suppliers must provide the necessary infrastructure to manage cyber security risks in their digital interactions with **GAZİ METAL** (e-mail, data transfer, shared platforms). **Gazi Metal** is obliged to implement up-to-date protective measures against malware that could cause damage to its systems.

7.6. Fair Competition

Suppliers must comply fully with competition law; they must refrain from unethical market practices such as market sharing, price-fixing or agreements that restrict competition.

8. COMPLAINTS PROCEDURE AND HOTLINE

Suppliers must provide their employees with secure and confidential reporting channels to report any suspicions or findings of breaches of these rules. In addition, supplier employees have the right to use **GAZİ METAL** ’s ethics hotlines. No form of retaliation or punishment against those who report concerns is acceptable.

9. AUDIT AND VERIFICATION

GAZİ METAL requires all its suppliers to act in accordance **with the Supplier Code of Conduct** .

GAZİ METAL reserves the right to request information and documentation from its suppliers on a regular basis, where it deems necessary, in order to assess their compliance with these rules, and to carry out on-site inspections at any time.

Suppliers are obliged to provide the information and documents requested throughout the duration of their working relationship with **GAZİ METAL** and acknowledge that **GAZİ METAL** has the right to carry out audits.

10. NON-CONFORMITY AND CORRECTIVE ACTION

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Should a non-conformity be identified, the supplier is expected to carry out corrective action, following which a verification audit may be conducted.

In the event of serious breaches, the employment relationship may be terminated unilaterally.