

## Foreword

### Dear Business Partners or Suppliers,

As a regional operating company and a responsible corporate citizen, our business activities are based on high ethical and applicable legal standards. We foster a sense of trust with our stakeholders and meet our responsibility of being a reliable and successful business partner by considering integrity as a key element of our business behaviour.

Our Supplier Code of Conduct sets out the key principles of ethical conduct that you (as our partners or supplier) agree must be upheld when working with the Catoni Group of Companies. This guide sets out minimum requirements for our partners and select suppliers as decided by us to operate by responsible business principles in full compliance with all applicable laws and regulations.

Where the standards in this guide differ from local and national laws as well as international standards, we expect our suppliers to apply stricter standards. In the event of standards in this Code of Conduct conflicting with local and national laws and international standards, we encourage our suppliers to address such conflicts with us to jointly establish the most appropriate course of action.

This Code of Conduct reflects our commitment to the United Nations Global Compact (UNGC) and our respect for universally recognized normative standards such as the United Nations Universal Declaration of Human Rights, ISO standards on HSE and the core labour conventions of the International Labour Organization (ILO).

Please ensure that all your staff and subcontractors who are involved in your supply of goods or services to Catoni Group operate to standards at least as high as those set out in this Supplier Code of Conduct.

Thank you.

**Serdar AYIRTMAN**  
CEO, Catoni Group of Companies

## Introduction

### 1. Validity

The Supplier Code of Conduct of Catoni Group is in effect as of 1<sup>st</sup> August 2022.

### 2. Purpose and Scope

The purpose of this document is to describe our group's standards of business ethics. It sets out how we will behave towards our suppliers and how we expect our suppliers to act. It applies to all suppliers to us of goods and services, partners, sub-contractors and sub-agents.

Breaching this guide may result in the termination of business activities and serious cases possible civil action.

### 3. Compliance with the Law

The supplier shall comply with all laws applicable to its business. The supplier shall support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the UN Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises as well as the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work, by national laws and practice. Suppliers shall:

- Avoid participation in or knowingly benefit from, any kind of corruption, extortion or bribery;
- Adhere to applicable anti-corruption and anti-bribery laws, directives and regulations that govern operations in the countries in which they operate;
- Avoid facilitation payments and work towards eliminating them;
- Adhere to anti-trust and other competition laws;
- Disclose any potential or actual conflict of interest;
- Adhere to national and international foreign trade control laws about business transactions with countries, companies and persons (sanctions), and the transfer of goods and services, software or technology between countries (export controls).
- Exercise quality and sustainability due diligence when designing, manufacturing, and testing products;
- Avoid accepting gifts and hospitality or conflict of interest to influence the work that our organization do together.

## 4. Fair Business Conduct

Business is to be conducted fairly and ethically, promoting healthy competition and protecting the interests of our customers and other stakeholders.

Suppliers shall act ethically and transparently that contributes to the health and welfare of society.

## 5. Human Rights and Fair Labour Practice

As a Supplier, you must recognize and support equal human rights and take a stand on discrimination, differential treatment, harassment, and inappropriate or unreasonable interference with work performance, whether based on nationality, race, disability or gender, including gender identity or gender expression, sexual, religious or political orientation, ethnic or social background.

The following rules always apply:

- Physical, sexual, mental or verbal abuse is prohibited as is any threat of abuse or any other form of intimidation;
- Forced employment and working conditions resembling slavery are prohibited;
- The employment of children contrary to ILO Convention C138 on minimum age for labour is prohibited;
- Employees have the right to join a union and engage in collective bargaining;
- Employees must receive a letter of confirmation of their employment conditions if so required by national legislation;
- The remuneration of employees should meet or exceed statutory or agreed-on national industry minimum standards;
- Support a constructive dialogue between employer and employee;
- Comply with appropriate working hour requirements including overtime, breaks, and rest periods as established by national law, relevant collective agreements and international standards;
- Adhere to relevant national laws, industry standards and international standards for paid sick leave, annual leave and parental leave;
- Commitment to the fight against modern slavery;
- Take extra precautions to respect the rights and well-being of migrant workers whose rights may be at risk or who may lack access to basic public services.

## 6. Health, Safety, Environment and Quality

Catoni Group is committed to an incident-free workplace in each and every site it governs. Our performance relies on our ability to continually improve the quality of the services we provide to our clients, while protecting people, minimizing the impact on the environment and climate, and damage to assets.

We require our partners or suppliers to provide a safe, secure and healthy working environment for all of their workforce. Suppliers should;

- Develop and implement effective health and safety management systems with worker participation in the safety committees;
- Ensure that safety management systems support identifying risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimize health and safety risks emanating from its operations;
- Ensure that any equipment used providing services to Catoni Group is of good and sound quality, meets the general and legally required standard of maintenance and satisfies any safety regulations or measures at all times;
- Ensure compliance with applicable laws, regulations and customer requirements;
- Ensure protection of their workforce by providing basic personal protective equipment appropriate to the nature of work and relevant training on health and safety systems;
- Empower workers to report unsafe practices without fear of reprisal;
- Commit to proactively undertake safety initiatives to protect people and assets from harm and damage;
- Comply with specific requests, rules and regulations laid down by us or our clients in respect of the general behavior, handling, stowing, loading, unloading and transport of materials at the designated location;
- Comply with all relevant local and national environmental laws as well as international standards, obtain and maintain all the necessary environmental permits, approvals and registrations;
- Develop and implement effective environmental management systems that support identifying risks, measuring and monitoring performance, and minimize environmental impacts emanating from its operations;
- Develop a precautionary principle approach and promote environmentally friendly technologies and processes in their own operations and across the supply chain.

## 7. Data Protection

As a part of Due Diligence, we collect personal data from its partners and suppliers such as company information, telephone number and postal or email address.

To comply with data privacy legislation, we have issued binding corporate rules ensuring that collected personal data is not corrupted, copied, stolen, disclosed, misused or made accessible to persons without adequate authorization and approval.

The information security requirements applicable to suppliers with regards to any data entrusted to their control during and after their engagement with we are based on international standards.

Suppliers should take account of the need to protect the confidentiality, integrity and availability of information. At all times the required level of information security and control to be ensured by suppliers must be commensurate with the sensitivity, value and criticality of the information being processed throughout the lifecycle of the information.

The supplier shall adhere to applicable data protection laws, including security of personal data, as well as to respective regulation, e.g. GDPR, in particular with regard to personal data of customers, consumers, employees and shareholders.

The supplier shall comply with all said requirements when personal data is collected, recorded, hosted, processed, transmitted, used or erased.

## 8. Trade Regulation

The partner or supplier shall comply with all applicable export control, sanctions and customs laws and regulations, including Prohibitions & Restrictions ("Trade Laws"). The partner or supplier in particular ensures that the supplier, its beneficial owner(s), all its agents and any other subcontractors used by the supplier are not listed on any applicable Denied Party sanctions lists.

The partner or supplier will not be involved in terrorism, money laundering or any other form of organized crime and will furthermore conduct careful study into the processes for transactions to ensure they are not used in such crimes.

## 9. Compliance with the Supplier Code of Conduct

Catoni Group reserves the right to check compliance with the requirements of this guide, for example through self-assessments and audits either by our Compliance Officer or a third party.

The partner or supplier shall strive for continuous improvement, such as setting measurable targets on the environment, working conditions or diversity, and reporting on progress for sustainability. In case non-conformity is identified, a CAPA plan shall be created by the partner or supplier.

The terms and conditions set forth in this Supplier Code of Conduct reflect our values and commitment to its customers, the communities which we serve and the protection of the environment. Therefore, any breach of these terms and conditions must be cured. Without prejudice to any other contractual remedies we may be entitled to, any failure to cure such a breach immediately will cause our facilities to consider ending the commercial relationship.

## 10. Reporting Violations or Concerns

We expect our partners and suppliers to have a reporting system to ensure that employees can voice grievance or violations anonymously and without fear of reprisals on any aspect of this Supplier Code of Conduct. All concerns should be methodologically investigated in a fair and timely manner.

In case you wish to report suspected breaches of law, you can contact the Compliance Department of Catoni Group via e-mail ([HSEQ@catoni.com.tr](mailto:HSEQ@catoni.com.tr)) or telephone (+90 232 421 00 02).