



RESPONSIBLE PROCUREMENT POLICY AND ETHICAL CONDUCT RULES FOR SUPPLIERS

No: P12

Sayfa 6

SCOPE AND PURPOSE

The purpose of Responsible Procurement Policy ("Policy") is to share Ditaş A.Ş.'s basic principles and values with outsourcing companies, suppliers and work partners and provide guidance on the standards that we expect them to obey.

This Policy has been laid down to make sure that suppliers do business in compliance with Ditaş A.Ş. Ethical Principles and Code of Conduct and existing legal rules and all suppliers and business partners are obliged to comply with this policy.

This policy also covers the relevant stages in the selection and monitoring processes of Ditaş A.Ş.'s business partners and suppliers.

It's mandatory to comply with the principles of the Policy and other relevant regulations. Ditaş A.Ş. expects all suppliers and business partners to act accordingly and takes the relevant steps. Operations with any persons and/or entities who do not observe this policy are terminated.

DEFINITIONS

This section briefly describes the special terms, concepts, and abbreviations used in the Policy.

"UN" means the international organization of the United Nations.

"UN Global Compact" consists of 10 principles determined in the fields of human rights, working conditions, environment and anti-corruption. These principles have been prepared with a guiding perspective for companies and organizations to achieve higher goals in terms of sustainability and risk management, thus contributing to increased productivity, employee motivation and loyalty, brand awareness and access to new markets.

"ILO" means International Labor Organization.

"International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work" was adopted in 1998, and all members declare that they are liable, in good faith, to respect, improve and support the principles and rights in the following four categories even though they haven't approved the relevant conventions. The categories are as follows:

- Freedom of association and the effective recognition of the right to collective bargaining,
- The elimination of forced or compulsory labour,
- The effective abolition of child labour,
- The elimination of discrimination throughout employment.

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The European Convention on Human Rights (ECHR) is the text agreed upon by the members of the Council of Europe to collectively guarantee the rights contained in the Declaration of Human Rights on 4 November 1950.

"Human Rights" represent rights inherent to all people, regardless of gender, race, color, religion, language, age, nationality, different thoughts and include the right to a free and dignified life.

GENERAL PRINCIPLES

1. WORKING CONDITIONS AND HUMAN RIGHTS

Ditaş A.Ş. acknowledges that all people should be treated with respect and dignity as per International Labour Organization, Universal Declaration of Human Rights and the Constitution of Turkey and Labor Law No. 4867. Employers have a significant effect on the well-being of their employees and therefore have a great responsibility in this regard. Ditaş A.Ş. and its stakeholders are responsible for implementing human rights standards wherever they operate. Suppliers are also expected to comply with these regulations.

1.1. Non-Discrimination

Ditaş A.Ş. undertakes that all its suppliers shall approach all employees and employee candidates equally in all recruitment and employment processes, regardless of language, color, race, gender, religion, age or sect. Ditaş A.Ş. expects and requests its suppliers to act on the basis of equality in development processes of its employees, career opportunities, management of wages and benefits.

1.2. Harassment

Ditaş A.Ş. expects its suppliers to provide their employees with a working environment free of violence, harassment and other disturbing conditions arising from internal and external threats. Therefore, Ditaş A.Ş. expects its suppliers to show zero tolerance for all kinds of physical, verbal, sexual or psychological harassment, bullying and abuse.

1.3. Zero Tolerance for Child Labor and Forced Labor

Child labor is unacceptable. Ditaş A.Ş. expects its suppliers to strongly oppose child labor, which poses physical and psychological threats to children. Also Ditaş A.Ş. expects its suppliers to oppose all forms of forced labor, which is labor without the worker's consent under threat, and to undertake that such a work environment will not be present. In case there is any children working in the supply chain of DITAŞ, the respective supplier shall be responsible for taking the measures to protect the affected children and DITAŞ shall be responsible for supervising that process.

Ditaş A.Ş expects its suppliers to apply zero tolerance policy towards slavery and human trafficking and act accordingly as per conventions and recommendations of International Labor Organization, Universal

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Declaration of Human Rights and UN Global Compact, which provide the basis for Ethical Principles and Code of Conduct.

1.4. Young workers

DITAŞ expects its suppliers to ensure that legal young workers under the age of 18 do not work overtime or at night and are protected against working conditions that are harmful to their health, safety, morality or development.

1.5. Wages and Benefits

Ditaş A.Ş expects its suppliers to perform the determination of wages and benefits in a competitive manner according to the local labor market or in accordance with the standards agreed within the scope of the collective bargaining agreement, if any. Suppliers are expected to ensure that all benefits and wages are paid regularly, transparently and in accordance with applicable laws and regulations.

1.6. Freedom of Association and Collective Bargaining

Ditaş expects their suppliers to ensure and support that their employees have the fundamental right to freely, voluntarily and without interference, to become a member of trade unions and associations and to form and to participate in employee representation of their choice, and to bargain collectively.

1.7. Working Hours, Working conditions and Occupational Health and Safety

Ditaş expects and requests its suppliers to follow and implement legal regulations within the scope of working hours and conditions. Suppliers are expected to provide a safe workplace environment for their employees and establish an efficient work-life balance with regular breaks and leaves. Ditaş A.Ş expects and requests its suppliers to act in accordance with legal regulations required for occupational safety, protecting employee health and avoiding risks.

1.8. Modern Slavery

Modern Slavery refers to activities resulting in an abhorrent abuse of human rights and consists of slavery, captivity, forced and compulsory labor, and human trafficking.

Ditaş expects its suppliers not to allow any type of modern slavery methods as per European Convention on Human Rights. Ditaş supplier should comply with all legislation and regulations related to the Modern Slavery Law.

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2. HEALTH, SAFETY, AND ENVIRONMENT

2.1. Health and Safety

DİTAS suppliers know that a healthy and safe workplace environment is essential for employees. Within the scope of these processes, DİTAS expects its suppliers to comply with all legal regulations and legislation regarding occupational health and safety defined by official applicable laws.

2.2. Environment

Ditaş carries out its process management with a management philosophy based on minimizing or eliminating the damage it causes to the environment. In this framework, it expects its suppliers to support economical use in all their processes where there is natural resource consumption such as energy and water. Ditaş expects and requests its suppliers to carry out carbon emission measurements, carry out studies to improve their performance in environmental issues such as water management, waste management and biodiversity, and to establish monitoring systems by which they can monitor these performances regularly.

Ditaş requests its suppliers to control and check all chemical substances they use with their CAS numbers and act within the scope of REACH Regulation. Ditaş A.Ş. expects and requests its suppliers to manage their waste in accordance with the Environment Regulation.

2.3. Responsible Sourcing of Raw Materials Policy

Ditaş strives to supply the raw materials used in its operations in a responsible manner. It undertakes to conduct its operations in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and other laws and regulations related to conflict minerals, ensuring that it doesn't use conflict minerals in the raw materials it has procured. DİTAS refrains from intentionally purchasing any product, component or material containing minerals that are not confirmed by the DRC to be conflict-free. Ditaş does not use raw materials containing minerals such as tin, tantalum, tungsten or gold (3TG) and does not use products with this content in its production processes. It also undertakes to refrain from any act contributing to financing of conflict and observe the relevant UN sanction decisions or the local laws applying these decisions in cases where they're applicable, and expects its suppliers and work partners to observe the same issues.

Ditaş undertakes that for substances subject to legal restrictions or prohibitions, delivered materials or parts or components contained in them can only contain those in accordance with the relevant legislation (banned chemicals regulation, (EC) 1907/2006 REACH Regulation etc.).

Ditaş expects its suppliers to comply with the same Responsible Sourcing of Raw Materials policy. Ditaş cooperates with its suppliers to ensure awareness and compliance with the terms of this policy.

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3. BUSINESS ETHICS

Ditaş expects its suppliers to conduct their business fairly and honestly in accordance with the legislation and Ditaş Ethical Rules and Code of Conduct.

3.1. Conflict of Interests

Suppliers shouldn't engage in personal relationships that may cause or be perceived as conflict of interest between Ditaş's employees and themselves and that may damage Ditaş's reputation.

3.2. Personal Information

Ditaş requires its suppliers to protect the personal data of their employees, former employees, customers, suppliers and other relevant persons and demands that they implement the LPPD Policy. It expects that personal data is processed, used and stored only with the consent of the data subject, in accordance with a contractual agreement or legal rules.

3.3. Anti-Bribery, Corruption and Money Laundering

Suppliers are expected to comply with applicable legislation regarding prevention of bribery and anti-corruption while carrying out their activities. Ditaş's suppliers are expected to avoid engaging in any direct or indirect act that may seize someone else's right and make unfair gains.

Ditaş suppliers may not offer or give any valuable gifts, financial or other advantages to anyone in order to act biased or to influence the decision-making process.

Ditaş expects its suppliers to only work with business partners whom they are convinced of their honesty and integrity. Suppliers are expected and requested to comply with applicable legislation on the prevention of money laundering and to strongly oppose any activity that may lead to money laundering.

3.4. Fair Competition and Anti-Trust

Ditaş requires its suppliers compliance with applicable fair competition and antitrust laws. In particular, it expects that they will not enter into agreements with stakeholders or other third parties that are not in compliance with fair competition and will not abuse their dominant market position. It expects that its suppliers never engage in behaviors and agreements that may create a dominant position in the market with competitors or that may affect the pricing and marketing policies, or that may breach the competition regulations. It suggests that, in case of uncertainty, actions are taken by receiving the opinion of the Legal Consultancy Department.

3.5. Counterfeit Part

Ditaş expects its suppliers to supply all their products and services in accordance with the contractually specified quality and safety criteria and in their original form. If Ditaş detects that its suppliers use counterfeit parts and materials, it reserves the right to impose legal sanctions on the relevant supplier.

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3.6. Reporting

Suppliers are expected to create effective communication channels to report violations and take necessary actions on time. Suppliers are expected to be able to freely communicate their needs and concerns.

Ditaş expects its suppliers to strictly comply with legal provisions, and to use only proper accounting and correct financial reporting method.

3.7. Information Leakage

Ditaş concludes confidentiality agreements with its suppliers. Any and all type of information, document and documentation exchanged between the parties are within the scope of this confidentiality agreement and it is prohibited to disclose them to third parties and trade them. In this framework, Ditaş requests its suppliers to keep any type of information of Ditaş, personal information of employees and information of customers and business partners strictly confidential. Employees of the Suppliers may not disclose the confidential and non-public information about Ditaş, or may not use the same for their

own benefit or for the benefit of others. Ditaş expects its suppliers to respect all restrictions related to copyrights, trade names, trade secrets, and patents.

ENFORCEMENT

Suppliers are assessed on the abovementioned subjects during procurement processes, and in the event of identification of any non-compliance, the relationship with the supplier can be terminated. At the same time, Ditaş may ask questions using surveys, request sharing of relevant documentation and evidence and conduct audits in order to keep track of suppliers' compliance in the light of the abovementioned principles.

Ditaş Sustainability Committee Supply Operation Board is responsible for functioning of the policy.

Our suppliers are expected to be attentive to the principles specified in the Ethical Rules and Code of Conduct. Accordingly;

Actions are taken in accordance with the Labor Law, other respective legislation, and provisions of the policies, regulations, and procedures, against those breaching the rules specified in this document.

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