

COMPLIANCE

**SUPPLIER CODE
OF CONDUCT AND
BUSINESS ETHICS
POLICY**



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1. PURPOSE AND SCOPE

With its sustainability and social responsibility approach, Egebant aims to manage all operations effectively, reliably, and ethically. In this direction, the efficient use of limited natural resources, establishing environmentally responsible production processes while maintaining high quality, and contributing to economic and social development constitute the core principles of Egebant's vision.

Across every stage of the supply chain—from raw material sourcing to production, distribution, sales, and after-sales services—Egebant adopts a transparent, fair, and ethical approach towards all stakeholders, including customers, shareholders, employees, suppliers, and other stakeholders. Respect for human rights, labor safety, compliance with environmental requirements, and adherence to quality standards form the foundation of our supplier relationships.

The Egebant Supplier Business Ethics Principles have been established to ensure that our suppliers act in line with Egebant's values and the legal rules applicable in the countries where we operate. These Principles are a mandatory document that suppliers must comply with in all their operations. Additionally, suppliers are expected to develop a similar business ethics policy within their own supply chains.

While conducting our activities with integrity, transparency, and respect for human rights, we require our suppliers to adopt and implement these principles as well. The Supplier Business Ethics Principles set out the standards of conduct expected from our suppliers and provide guidance on topics such as anti-corruption, improving working conditions, information security, and ethical conduct in external relations.

Egebant takes into account the different legal systems in the countries where suppliers operate. However, unless a specific regulation is set for a particular situation, solutions must be developed through prudent and objective decisions aligned with the spirit of the Supplier Business Ethics Principles and Egebant's values.

2. DUTIES AND RESPONSIBILITIES

The Purchasing Department is responsible for the implementation of the Supplier Code of Conduct and Business Ethics Handbook. All our departments and employees are obliged to fulfill the requirements of this policy and act in accordance with these principles in business processes.

Supplier Onboarding and Auditing

Companies wishing to work with Egebant must contact the Purchasing Department, complete the "Supplier Candidate Selection Form," and submit the requested documentation. Following the application, relevant departments perform an evaluation and, for suppliers deemed suitable, mutual site visits are planned.

3. GENERAL PRINCIPLES

3.1. LEGAL PRACTICES

3.1.1. Trade

Egebant complies fully with international export, import, and trade laws in all commercial activities. Suppliers are also required to comply with global trade regulations, export/import laws, and applicable regulations. These laws include embargoes, trade sanctions, customs regulations, country-of-origin marking rules, and anti-boycott laws.

3.1.2. Fair Competition and Antitrust

Egebant supports fair competition in all markets where it operates and maintains a clear stance against anti-competitive practices. Suppliers must fully comply with local and international competition laws. Practices that violate antitrust laws—such as cartel formation, price fixing, or market allocation—are strictly prohibited. Protecting competition is not only a legal requirement but also an ethical responsibility.

Suppliers are expected to adopt this approach in their own business relationships and avoid any conduct that could harm fair competition.

COMPETITION LAW COMPLIANCE POLICY

3.1.3. Export Controls and Economic Sanctions

Full compliance with export controls, economic sanctions, embargoes, and customs regulations applicable in all regions where Egebant operates is essential. Suppliers must act in compliance with all applicable laws and regulations relating to international trade, including embargoes, boycotts, export licenses, and sanctions.

Violations may lead not only to reputational damage but also serious sanctions such as administrative fines, license cancellations, and even imprisonment. Suppliers are required to monitor up-to-date regulations in the countries where they operate and take necessary measures accordingly.

3.1.4. Anti-Bribery, Anti-Corruption, and Anti-Money Laundering

Suppliers must not give or receive bribes or engage in any corrupt activity to obtain business or financial gain. Egebant applies a zero-tolerance approach towards illegal activities such as corruption, embezzlement, bribery, and money laundering. Suppliers must fully comply with relevant national and international laws and regulations.

3.1.5. Counterfeit and Suspect Parts

Egebant strictly prohibits counterfeit or suspect parts within its supply chain. Suppliers are required to provide only original and certified products. Supplying counterfeit or suspect parts creates serious safety and quality risks and may lead to legal liabilities. Such parts can harm the Company's reputation and cause legal issues. Suppliers must be able to document the quality and authenticity of the parts provided and take necessary measures to prevent counterfeiting, fraud, and other illegal activities.

3.2. ETHICAL RULES

3.2.1. Data Protection and Information Security

Egebant expects all business partners and suppliers to comply with all applicable legal requirements regarding the protection of personal data and sensitive commercial information. Suppliers are responsible for ensuring the security of data belonging to employees, customers, and third parties, using such information only for authorized purposes, and taking all necessary technical and administrative measures against unauthorized access, disclosure, alteration, or destruction.

The same sensitivity applies to Egebant. Confidential information belonging to suppliers is used only to the extent required for business purposes and with appropriate security measures and is not shared with third parties without authorization. In case of suspected data breaches, relevant parties must be informed immediately.

3.2.2. Financial Responsibility (Accurate Records)

Egebant requires all financial transactions to be recorded in a transparent, accurate, and traceable manner. Accordingly, suppliers are expected to maintain accounting records, commercial documents, and financial reporting in compliance with applicable laws, accounting standards, and internal control procedures.

Under no circumstances should false documentation be created, income or expenses be concealed, or misrepresented. All records relating to the business relationship with Egebant must be clear, auditable, and retained in a manner that allows them to be provided upon request.

Financial transparency is not only a legal requirement but also the foundation of sustainable partnerships built on trust.

3.2.3. Disclosure of Information

Egebant values conducting its operations in a transparent and responsible manner. However, transparency does not include unauthorized disclosure of confidential or trade secret information. Suppliers are expected to make disclosures only within the framework of applicable legal requirements and contractual obligations.

No information belonging to Egebant or obtained through cooperation with Egebant may be shared with third parties without prior written approval. Likewise, Egebant uses and protects suppliers' confidential information only to the extent required for business purposes and in accordance with confidentiality obligations.

3.2.4. Conflict of Interest

Egebant aims to prevent suppliers' personal, financial, or family interests from compromising impartiality and integrity in business relationships. Suppliers must avoid any conflict of interest that contradicts the Company's interests and ethical rules.

Suppliers must make business decisions independently of personal interests, solely within a framework of professionalism and objectivity. If a conflict of interest arises, it must be reported immediately. Egebant expects conflicts of interest to be managed transparently and resolved appropriately.

3.2.5. Intellectual Property

Egebant respects its own intellectual property rights (trademarks, patents, designs, etc.) as well as those of its suppliers. Suppliers must respect Egebant's and third parties' intellectual property rights. (Further details are set out in Egebant's Human Rights Policy and related policies.)

3.2.6. Whistleblowing and Protection Against Retaliation

Egebant encourages voluntary reporting of unethical behavior, illegal practices, and situations contrary to Company policies. Suppliers must also provide transparent and accessible mechanisms within their organizations so that employees can report such matters safely.

No employee or supplier representative should be dismissed, threatened, excluded, or subjected to any retaliation due to a good-faith report. Any retaliatory conduct is considered a serious ethical violation by Egebant.

3.2.7. Gifts, Hospitality, and Entertainment

Egebant adopts an approach in business relations that is transparent, honest, and free from conflicts of interest. Suppliers are expected to act in accordance with ethical rules regarding gifts, hospitality, and entertainment.

Invitations from suppliers for meals, meetings, or social events may be acceptable if they are business-related and within reasonable limits. However, it is important that such invitations do not conflict with Egebant's interests and Company policies.

Suppliers must not offer any gift, payment, entertainment, or hospitality intended to influence business decisions. Where such situations are identified, Egebant will evaluate the matter with relevant departments and take necessary actions.

3.3. LABOR STANDARDS

3.3.1. Child Labor and Young Workers

Egebant strictly rejects all forms of child labor. Suppliers are expected to fully comply with applicable national laws and ILO standards on child labor. Employment of children of compulsory school age is unacceptable.

Where young workers are employed, they must be employed within legal limits and under safe conditions that do not endanger their physical or psychological development or interfere with their education. Egebant expects suppliers to establish necessary policies and controls in this regard.

3.3.2. Wages and Benefits

Suppliers must pay employees fairly, on time, and in full at least at the minimum wage level, in accordance with applicable labor laws and sector standards. Overtime payments, holiday and leave entitlements, and all benefits must be provided in compliance with legislation.

Egebant is committed to working with suppliers who adopt a transparent, fair, and legally compliant approach that supports employees' economic well-being.

3.3.3. Working Hours

Suppliers must set working hours in compliance with applicable laws and regulations and adopt fair and humane practices aligned with international standards. Daily and weekly maximum working hours must not be exceeded; overtime must be voluntary and compensated fairly.

Egebant considers adequate rest periods and work-life balance a core responsibility and expects the same sensitivity from suppliers.

3.3.4. Modern Slavery (Slavery, Servitude, Forced and Compulsory Labor, Human Trafficking)

Egebant does not tolerate any form of modern slavery. Suppliers must ensure that employees work freely and that no individual is forced to work through threats, pressure, debt bondage, or other means. Forced labor, human trafficking, withholding passports/identity documents, and restricting freedom of movement are strictly unacceptable.

Suppliers are responsible for protecting employee freedoms from recruitment through the entire employment period and establishing effective mechanisms against such abuse.

3.3.5. Freedom of Expression

Egebant commits to protecting and encouraging employees' freedom of expression within legal and ethical boundaries. An environment where different views can be expressed freely supports both individual development and organizational progress. Egebant maintains a policy that allows employees to openly express concerns, suggestions, and complaints.

Suppliers are expected to adopt a similar open communication culture in their workplaces, ensuring employees can voice opinions freely, ask questions, and use grievance mechanisms when needed. This culture strengthens employee engagement and psychological safety and creates a sustainable and peaceful work environment.

3.3.6. Ethical Recruitment

Egebant expects all suppliers to adopt transparent, fair, and ethical recruitment practices and to promote diversity, equity, and inclusion throughout recruitment processes. Recruitment must be voluntary, non-discriminatory, and conducted in a clear and understandable manner.

Under no circumstances may suppliers charge illegal fees or commissions to workers during recruitment. If suppliers use recruitment agencies, they must ensure such agencies comply with ethical principles and inclusive recruitment standards.

Suppliers must ensure that employees are fully informed of all contractual terms prior to employment and that documents are provided in a language the employee can understand.

3.3.7. Freedom of Association and Collective Bargaining

Egebant respects employees' freedom of association and expects all suppliers to do the same. Employees have the right to freely choose their representatives, form a union, or join an existing union. These rights must not be obstructed or punished.

Suppliers must respect employees' collective bargaining rights and fully recognize these rights by respecting collective negotiation processes. A workplace environment enabling employees to be represented independently must be established.

3.3.8. Discrimination and Harassment

Egebant commits to equal opportunities and promotes diversity, equity, and inclusion in all workplaces. Discrimination, harassment, bullying, or conduct that violates human dignity is unacceptable. Suppliers must adopt these values and apply a zero-tolerance approach against any discrimination.

Discrimination may not be based on race, color, religion, gender, age, disability, nationality, ethnic origin, sexual orientation, or any other basis. Likewise, harassment—including sexual harassment, psychological bullying, verbal or physical threats—is strictly prohibited.

Suppliers must ensure all employees work in a safe and respectful environment and must report any discrimination or harassment incidents immediately.

3.3.9. Women's Rights

Egebant encourages women's participation in the workforce and equal opportunity based on equal rights. Ensuring equal opportunities for female employees and applying zero tolerance for gender discrimination are among our most important responsibilities. Suppliers must adopt these principles and create an environment that supports women's equal opportunities in working life.

Protection of women against discrimination, violence, harassment, and exploitation, and development of fair and inclusive policies against all discrimination should be prioritized.

Suppliers must ensure women have equal opportunities in recruitment, training, pay, and promotion and implement practices that eliminate gender-based discrimination.

3.3.10. Diversity, Equity, and Inclusion

Egebant is committed to providing a working environment that supports diversity, equity, and inclusion. We value employees with diverse backgrounds, experiences, and perspectives, and believe such diversity contributes to innovation and business growth.

Suppliers must create a working environment in which everyone has equal opportunities and is protected against discrimination, prejudice, and exclusion, and must eliminate any discrimination based on gender, race, ethnic origin, disability, age, or other personal characteristics. Policies promoting diversity and inclusion must be integrated into all company processes and an equitable approach adopted for all employees.

3.3.11. Rights of Minorities and Indigenous Peoples

Suppliers must fully respect the rights of minorities and indigenous peoples in the regions where they operate and avoid any practice that may lead to violation of these rights. Suppliers are expected to adopt a sustainable, fair, and ethical approach to avoid harming indigenous lands or living areas.

Suppliers must comply with all legal requirements on minority rights in line with local laws and international human rights conventions. The inclusion of indigenous peoples in decision-making processes in accordance with their will and participation is essential.

3.3.12. Use of Private or Public Security Forces

Suppliers must prevent private or public security forces from using disproportionate force in their activities affecting communities and must apply security measures only within legal boundaries and when necessary. Suppliers must oppose any use of force that violates community rights and establish necessary monitoring and oversight mechanisms.

Suppliers must make maximum efforts to ensure security forces are effectively supervised and respect human rights. Community rights and living areas must be prioritized when implementing security measures.

3.4. OCCUPATIONAL HEALTH AND SAFETY (OHS)

Egebant places employee health and safety above all else. Ensuring that workplaces are healthy, safe, and sustainable for all employees is also a responsibility we expect from our suppliers. Accordingly, suppliers must fully comply with local and international occupational health and safety legislation and must not create any situation that could endanger employee health or safety.

Suppliers must take and implement the following measures:

- Take all necessary actions to ensure workplace safety, conduct risk assessments, and keep safety measures up to date,
- Provide regular occupational health and safety trainings to employees to support safe working habits,
- Establish emergency plans, ensure effective implementation, and inform employees about emergency procedures,
- Provide appropriate equipment and personal protective equipment (PPE) to minimize workplace health and safety risks,
- Initiate required reporting processes in case of any health or safety violations and take prompt actions to protect employees.
- Egebant expects occupational health and safety to remain a top priority and requires suppliers to approach these values with the same level of sensitivity.

3.5. ENVIRONMENTAL SUSTAINABILITY

3.5.1. Greenhouse Gas Emissions and Decarbonization

Egebant develops strategies to reduce greenhouse gas (GHG) emissions and achieve decarbonization targets by minimizing carbon emissions in production processes. Egebant monitors emissions, uses technologies to reduce them, and shifts towards clean energy sources. It implements solutions that increase energy efficiency to reduce carbon footprint.

Suppliers are expected to support these targets by participating in carbon reduction efforts and using sustainable energy solutions. They must monitor their carbon footprint and report to Egebant upon request.

3.5.2. Energy Efficiency and Renewable Energy

Egebant adopts a sustainable approach to energy efficiency and renewable energy use. It continuously improves production processes to optimize energy consumption and invests in energy-saving technologies. By increasing the use of renewable energy sources, Egebant aims to minimize environmental impacts and reduce its carbon footprint.

Suppliers must also develop strategies to improve energy efficiency and use renewable energy sources as part of their environmental responsibility, monitor energy consumption, and take steps to use energy efficiently.

3.5.3. Responsible Chemical Management

Egebant acts responsibly in the use of chemicals to minimize environmental impact and prevent occupational health and safety risks. Processes for safe storage, transport, use, and disposal of chemicals are strictly monitored. Suppliers must use only approved and safe chemicals, take necessary precautions against harmful effects, and fully comply with legal requirements.

Chemical-related activities must be audited regularly, and safer alternatives should be encouraged in place of substances that may pose risks to the environment and human health. Suppliers are required to provide necessary trainings for safe and sustainable chemical management and to report regularly to Egebant.

3.5.4. Water Quality, Consumption, and Management

Egebant places great importance on using water resources sustainably and protecting water quality. Water is a critical resource in all production processes, and all necessary measures are taken to ensure efficient use and prevent pollution.

Suppliers must ensure responsible water use and proper treatment of wastewater so that it does not harm the environment. They should also develop innovative solutions to minimize water consumption. Protecting water quality, reducing environmental impacts, and ensuring the sustainability of water resources are key responsibilities expected from suppliers.

3.5.5. Air Quality

Egebant commits to minimizing the impact of its activities on air quality. By controlling harmful gas emissions in production processes, we protect the environment and consider public health. We use innovative technologies to improve air quality and comply with local and international air quality standards.

Suppliers must take all necessary measures to prevent air pollution and minimize harmful emissions in production processes. This responsibility is one of the criteria Egebant expects suppliers to meet in alignment with environmentally friendly production methods.

3.5.6. Sustainable Resource Management

Egebant is committed to using natural resources efficiently and sustainably. We develop strategies to conserve resources, increase efficiency, and minimize waste. Sustainable resource management across both our production processes and supply chain is a key objective to reduce environmental impacts.

Suppliers must use natural resources efficiently and optimize resource management to prevent excessive consumption. They should also identify improvement opportunities for resource conservation and cooperate with Egebant to achieve sustainability goals.

3.5.7. Waste Management and Circular Economy

Egebant commits to minimizing waste generation and, where possible, reusing or recycling waste. Based on circular economy principles, strategies are developed to extend the life of products and materials, enable recovery of waste, and minimize the use of natural resources. This approach contributes both to reducing environmental impacts and improving efficiency in business processes.

Suppliers must take measures to reduce and reuse waste in production processes, support recycling practices, and contribute to the circular economy model.

3.5.8. Soil Quality

Egebant conducts its production activities within industrial zones in compliance with environmental obligations and legal requirements. Our facilities are located in areas suitable for industry and away from agricultural production areas; our activities do not directly create polluting impacts on soil.

We adopt a “do not pollute” principle to prevent soil pollution. We expect the same approach from our suppliers. Suppliers are expected to implement practices that protect soil quality, act in compliance with environmental regulations, and establish systems that prevent polluting impacts within their operations and supply chains.

3.5.9. Biodiversity and Deforestation

Egebant is committed to protecting biodiversity and preventing deforestation. We operate without damaging ecosystems and while protecting natural habitats. Protecting biodiversity is essential for ecological balance and preventing species extinction. Protecting forest ecosystems is vital not only for the environment but also for combating climate change.

Suppliers are expected to avoid harmful practices that may negatively affect biodiversity in their areas of operation, produce in environments contributing to biodiversity protection, and refrain from participating in projects that may cause deforestation.

3.5.10. Land, Forest, and Water Rights and Forced Evictions

Egebant respects land, forest, and water rights and places great importance on sustainable management of these resources. Suppliers must not harm local communities' land and water rights during their activities and must avoid forced evictions. Violations of these rights may harm the environment and communities and negatively affect business operations. Egebant applies a zero-tolerance policy towards such practices and expects suppliers to take responsibility in this regard.

3.5.11. Conflict Minerals

Egebant adopts a transparent and responsible supply chain management approach that respects human rights and monitors the origin of raw materials used in sourcing in line with ethical and sustainable principles.

In this context, it is crucial to ensure that minerals such as tin, tantalum, tungsten, and gold extracted from conflict-affected areas (“conflict minerals”) do not finance illegal armed groups.

Suppliers are expected to ensure traceability of minerals used in their products, declare that they source from conflict-free supply chains, and act in compliance with Egebant's policy. Egebant fully complies with international regulations and industry standards and requires suppliers to assume the same responsibility.

3.5.12. Noise Emissions

Noise can affect not only employee health but also the quality of life of nearby communities. Therefore, maintaining noise levels within legal limits in production processes and facility operations is one of our priorities.

Suppliers are expected to demonstrate the same environmental sensitivity. They must monitor noise emissions regularly and take necessary technical and managerial measures to prevent noise levels that may disturb employees and the public. Improvement efforts to reduce noise sources should be considered part of sustainable production.

3.6. PROMOTING ETHICAL STANDARDS THROUGHOUT THE SUPPLY CHAIN

Egebant expects not only its suppliers but also the sub-suppliers engaged by its suppliers to comply with these business ethics principles. Suppliers must take necessary steps to ensure that ethical principles are adopted throughout the supply chain and encourage their own suppliers to comply with these standards. This approach plays a fundamental role in creating a sustainable and responsible business environment.

3.7. REPORTING MECHANISM

Supplier employees who believe that the Supplier Business Ethics Principles have been violated are expected to report the matter as soon as possible through the Egebant Ethics Line. This mechanism aims to prevent unethical conduct and to support integrity and openness in business relationships.

The Ethics Line may be used in situations including, but not limited to:

- Violation of the Supplier Business Ethics Principles,
- Illegal transactions, poor governance, abuse of professional position,
- Practices that may harm health, safety, and the environment,
- Non-compliance with legal obligations in countries of operation,
- Any behavior that may harm Egebant's operations or reputation.

Egebant does not disclose the identity of reporting persons without their explicit consent and guarantees that they will not be subject to pressure, discrimination, or retaliation. The identity of the reporting person may be disclosed only if:

- The person voluntarily discloses their identity,
- Identity is required for authorities to conduct an effective investigation,
- Applicable laws require disclosure.

Reporting Channels

Reports regarding unethical situations may be submitted via the confidentially managed Egebant Ethics Line. The reporting person may:

- Submit an anonymous report,
- Provide contact details to receive a direct response.

To access the Ethics Line:

Website: <https://www.egebant.com.tr/tr/kurumsal/etik-form>