

SUPPLIER BUSINESS ETHICS AND CODE OF CONDUCT

SF 169 Rev 00

INTRODUCTION:

At SAPIN, we expect from all of our suppliers to adopt the business ethics and code of conduct in this text, implement in their work environments and share with their employees to ensure that their employees pay the necessary attention to these rules.

1. LEGAL PRACTICES:

Compliance with Legislation and Contracts - Suppliers do act in accordance with all applicable compliance with legislation and contractual provisions in their commercial activities.

Suppliers do not engage in anti-competitive work or transactions. They work in full compliance with the provisions of the legislation regulating their fields of activity.

Suppliers do not give, offer or accept bribes, payments or anything of value to institutions, organizations or individuals. Suppliers do not tolerate bribery and corruption in any way and behave consistently and responsibly in these matters.

2. WORKING CONDITIONS:

Suppliers do not discriminate in all employment-related decisions such as recruitment, promotion, compensation, benefits, training, compulsory dismissal, termination. They cannot discriminate based on language, race, color, gender, disability, political opinion, philosophical belief, religion and sect or similar reasons.

The wage paid by the suppliers to their employees, overtime or all rights related to wages must be equal to or more than the amounts determined in accordance with the current Labor Law and other relevant legislation regulations.

Suppliers use only voluntary workforce and employ staff who want to work of their own free will. They do not use any threat or force, make false claims, or use force by any other form of coercion on its staff to work.

Suppliers should not employ children and young workers under the age of 18 (eighteen) unless a higher age limit is specified in legislative regulations.

Suppliers act in accordance with current legislation regulations on matters related to working order, especially working hours and overtime.

Suppliers respect each individual's dignity, privacy, freedom of expression and rights. Suppliers recognize the rights of their employees to organize and collectively bargain in accordance with the law, and cannot discriminate and pressure their employees due to their participation in such legal organizations or trade unions.

Suppliers do not allow employees to violate their immunity in any way through physical, sexual, psychological or emotional harassment at the workplace or anywhere they are engaged, and they do not tolerate such events or behaviors that are contrary to the law and ethical rules. Suppliers do not ignore the harassment of the employee, do not take protective, encouraging, facilitating actions and practices for those who do them, and take measures to prevent psychological harassment from occurring.



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3. CODE OF ETHICS:

Suppliers should carry out all their activities in line with the following basic principles:

- Reflecting the values of honesty and accuracy values to the business.
- To be humble, respectful and mutual understanding.
- To be consistent and clear in their actions and statements.
- Working with cost awareness (avoiding waste) and efficiency targets.
- Focused on meeting customer needs in the best way possible.
- Working in accordance with the mission and with the goal of reaching the vision.
- Avoiding behaviors that would damage the company identity and reputation.
- Complying with the relevant legislation regulations in their work.
- Continuous improvement of competencies and service quality.
- Encouraging creativity, different ideas, logical and flexible thinking & teamwork.
- Carrying out the business activities with environmental conscious.
- To comply with the regulations to protect occupational health and safety and to take the necessary precautions.
- Confidentiality and Protection of trade secrets.
- Document, commercial or technical information received by the suppliers from SAPIN is kept confidential and do not disclose them to third parties or make them available in any way, unless otherwise stated in the contracts.

4. CONFLICT OF INTEREST:

Suppliers avoid actions that create incompatibility, unfair competition or conflict of interest with SAPIN, and do not use SAPIN's assets such as information, documents, any kind of infrastructure support for their own benefit.

Business Records - Suppliers create, record and store all business-related information accurately, in full compliance with applicable legislative regulations. Be honest and straightforward in discussions with regulatory agency or agency representatives and government officials. In addition, they do not make any fraudulent or non-conformity in documents (quality, training, production, etc....) needed for the continuity of the company.

Relations with Third Parties - Suppliers evaluate and select the organizations, dealers, business partners, suppliers and representatives with which they will make agreements, in a way that will provide the best service to its customers, by prioritizing the interests of SAPIN and in accordance with the principles of transparency, impartiality and equality.

Receiving and Giving Gifts - Except for commercial traditions and promotional materials, gifts and assets that give the impression of the existence of an irregularity, cause a dependency relationship or perceived as such are not sent or accepted by the supplier.

Material Usage - Suppliers never use counterfeit / copy material and faulty / defective materials and chemicals that have expired. All additional costs, losses or penalties arising from the use of these materials are compensated by the relevant suppliers.



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Supply Chain - Suppliers comply with the principle of non-discrimination in the selection of the suppliers they will work with and the attitude towards suppliers, and make reasonable efforts to ensure that their suppliers comply with all these Code of Ethics.

5. OCCUPATIONAL HEALTH AND SAFETY:

Suppliers comply with the legal regulations in the field of Occupational Health and Safety, and abide by the occupational health and safety responsibility of their employees and visitors. By implementing an effective occupational health and safety management system, they create safe and healthy working environments, control the dangers that their employees and visitors may be exposed to, and take the best possible precautions against accidents and diseases caused by the workplace. By providing training opportunities to their employees, they make sure that they are trained on occupational health and safety measures and that they implement the target practices and measures.

6. ENVIRONMENT:

Suppliers are aware of their social responsibility to protect the environment and actively establish or use an environmental management system that complies with international standards. They follow the environmental legislation regularly and comply with the legislation. In order to minimize the pollution of the environment and protect the environment, they continuously develop and spread this awareness to all their employees.

7. BUSINESS ETHICS PRACTICE PRINCIPLES:

SAPIN may inspect its suppliers' compliance with business ethics rules or assign a third party to carry out this control. SAPIN reserves the right to terminate its relationship with its supplier without compensation in the event of a violation of all these rules.

SAPIN may request the removal of the employee of any supplier who acts against the Supplier Code of Business Ethics and Code of Conduct and the law or contradicts these rules or may cease all cooperation with the relevant supplier.