



# SUPPLIER CODE OF CONDUCT HANDBOOK

2025

This document is belonging to Mutlu Akü ve Malzemeleri Sanayii Anonim Şirketi and/or its group companies (hereinafter collectively referred to as the “**Company**”), and quoting a section in this document requires the written approval of the Company.

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## AIM AND GENERAL EVALUATION

As Company, we always aim to exceed customer expectations by offering the best products to the market. We achieve this goal through partnerships with suppliers who share our commitment to quality and operate under a philosophy that focuses on doing the right thing with integrity and compliance.

The purpose of this Mutlu Supplier Code of Conduct Handbook ("**Supplier Code of Conduct**") is to ensure that the suppliers that conduct business partnerships with the Company comply with the universal rules that the Company undertakes to comply with. The Supplier Code of Conduct are the basis for our ongoing relationship with a supplier and are an integral part of your contract with the Company.

Company is aware that legal and cultural requirements differ in a global business environment and expects all its suppliers to comply with the applicable laws of their countries or regions. If you have questions regarding the Supplier Code of Conduct, or need any additional information or assistance, please contact your relevant Company Purchasing/Supply Chain Representative; If you wish to make a notification regarding the Supplier Code of Conduct, please contact the Company Secretariat via the email address [hub@mutlu.com.tr](mailto:hub@mutlu.com.tr). Thank you for sharing with us our desire to run a business partnership that adds value to life.

## COMPLIANCE WITH LAWS AND REGULATIONS

Company is committed to the policy of fair dealing and honesty while doing business. This commitment is based on the fundamental belief that business should be done honestly, fairly, and legally. All of the Company's suppliers must share the commitment to these high moral and ethical standards and compliance with all legal requirements.

All suppliers must always comply with all applicable laws and regulations and also the Global 10 rules of United Nations, which relates to activities performed for and on behalf of the Company.

Suppliers should ensure that their behavior can never be interpreted as contrary to the applicable laws and regulations governing the Company's activities. Suppliers should not forget that it is important how their behaviors are perceived by others and should act accordingly.

In addition to all relevant legislation, suppliers must also follow and act in accordance with the regulations and principles accepted by the Company. Such regulations, rules, and principles, including MUTLU CODE OF CONDUCT HANDBOOK, are an integral part of this Supplier Code of Conduct. The latest version of MUTLU CODE OF CONDUCT HANDBOOK can be found at <https://www.mutlu.com.tr/en/ethics>. Suppliers should reach this handbook and take all necessary measures to ensure that they and their employees comply with it.

## ETHICS

All of our stakeholders, who are in a business partnership with the Company, are expected to conduct their business in accordance with all laws and ethical rules and act with honesty.

### Business Integrity

A commitment to doing business with honesty is one of the most fundamental qualities we look for in our suppliers. According to this commitment, our suppliers must not engage in acts of corruption, misrepresentation, embezzlement, kickbacks or bribery to obtain and/or retain business, or to gain an unfair or improper advantage.

### Gifts

Suppliers must not engage in illegal payments or acts of corruption, or not tolerate or offer gifts, favors, or entertainment opportunities that aim to create or appear to create a sense of obligation for the recipient.

### Money Laundering

Money laundering is the act or attempt to execute a financial transaction knowing that it is designed in whole or in part to disguise or alter the nature, location, source, ownership, or control of the proceeds of a particular illegal activity. Suppliers will take all necessary measures to comply with anti-money laundering laws and regulations in order to help countries to detect, prevent and eliminate terrorist financing and activities.

### Intellectual Property

Suppliers must respect intellectual property rights and protect customer information. Technology and know-how transfers must be made in a manner that protects intellectual property rights and in accordance with the strictest information protection requirements under applicable agreements.

Suppliers must take the necessary precautions to detect and prevent intellectual property infringement and implement appropriate procedures.. The intellectual property rights of others must not be violated.

### Privacy and Protection of Personal Data

Suppliers are committed to maintain reasonable expectations of confidentiality regarding the personal information of everyone with whom they do business, including other suppliers, customers, consumers and employees. When personal data is collected, stored, processed, transmitted or shared by the suppliers, it will comply with the privacy, personal data protection and information security laws and regulatory requirements and all the rules and principles specified in the contracts signed within the scope of the business partnership. Personal data will not be collected or processed in advance on the assumption that it may be needed in the future, unless required or permitted by law.

### Export, Import and Trade Control

Suppliers undertake to comply with relevant laws and regulations in their export, import and all other commercial activities. Suppliers will comply with the World Trade Organization Safe application and similar SCS (Supply Chain Security) guidelines, Business Alliance for Secure Commerce (BASC), Customs-Trade Partnership Against Terrorism (C-TPAT) decisions.

### Competition and Anti-Trust Laws

Suppliers must conduct their business in full compliance with anti-trust and fair competition laws. In addition, suppliers must compete dynamically, aggressively and fairly; It must not make any compromises or agreements with its competitors that prevent competition in any way.

## WORK FORCE

All employees deserve an ethical and fair workplace. Accordingly, all suppliers and other participants in the supply chain of the Company are expected to comply with the following working standards:

## Prohibition of Child Labor

We do not consent to child or youth labor in our supply chain. Suppliers cannot employ individuals under the age of 18 and/or those not registered with the Social Security Institution.

## Freely Chosen Employment

We do not tolerate slavery, forced labor, involuntary servitude, or human trafficking in our supply chain.

## Diversity and Inclusion

Equal treatment of all employees will be the core principle of the supplier's corporate policy.

Discriminatory practices often involve considering— consciously or unconsciously — irrelevant characteristics of an employee, such as race, national origin, gender, age, physical appearance, social background, disability, union membership, religion, marital status, pregnancy, sexual orientation or gender identity. Gender expression or any other criteria deemed illegal under applicable law must not be considered in decision-making considered in the assessment.

## Fair Treatment

Suppliers will provide their employees with a workplace free of harsh and inhumane treatment, without any form of sexual harassment, corporal punishment or torture, mental or physical coercion, or verbal abuse or threats of such treatment to employees.

## Working Hours, Salaries and Benefits

Working hours for suppliers' employees will not exceed the maximum time set by applicable national law.

Suppliers are expected to provide their employees with fair and competitive wages and benefits.

Compensation and benefits should ensure an adequate standard of living for employees and their families. Employees of suppliers will be paid on time. Suppliers are encouraged to offer their employees with extensive training and development opportunities.

## Freedom of Association

Suppliers will be committed to an open and constructive dialogue with their employees and worker representatives. In accordance with local laws, suppliers will respect the right of their employees to organize freely, join trade unions, be represented, participate in works councils. Suppliers must not retaliate against employees acting as worker representatives.

## ENVIRONMENTAL, HEALTH & SAFETY (EHS)

Suppliers; will provide and maintain a safe working environment by minimizing physical, chemical and biological hazards through appropriate design, engineering and administrative controls, preventive maintenance, safe working procedures, safety training to prevent risks.

Suppliers; are responsible for ensuring that all their employees are qualified, with certification through training defined by legal regulations regarding the performance of the work, and for ensuring that they perform their tasks safely. Suppliers must integrate quality, environmental, energy, and occupational health and safety (EHS) management into their business processes, ensuring compliance at every stage of operations. The Company has the right to conduct audits at the supplier's facilities at any time it deems appropriate. In this context, suppliers will provide the following conditions, taking into account the entire product life cycle:

### Hazardous Materials

Suppliers must implement a systematic approach to ensure the safe use, transportation, storage, recycling and disposal of hazardous materials and all materials that may pose a hazard if released into the environment. In this systematic approach, compliance with local regulations and, where applicable, the required international certification requirements should be observed. Approval from the Company's Environment, Occupational Health and Safety Directorate should be obtained and information should be given in advance for all hazardous materials that will enter, be used and stored in the Company area.

Safety Data Sheets (SDS) must be sent to the Company in the appropriate format and language, in accordance with the relevant regulations, with the initial shipment of all chemicals and whenever there is a change in the product content.

For the transportation of the dangerous goods in highways, seaways, airlines, etc., international dangerous goods transportation standards such as ADR, RID, IMDG, IATA should be followed. Suppliers are obligated to provide the Company with up-to-date copies of all documents required in this regard as soon as possible, upon request.

### Conflict Minerals

The Company expects suppliers to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Suppliers undertake to:

- Work with their own suppliers to identify any conflict minerals in the value chain, including the smelter, country of origin, mining location, and the status of any conflict minerals that may exist;



- Work with their suppliers who may have potential risks to take action to mitigate or halt those risks, or to stop cooperation with suppliers following a failed attempt at risk mitigation;
- Not offer, promise, give, or request bribes to hide or alter the origin of conflict minerals, and oppose bribery incentives;
- Support or contribute to efforts aimed at effectively eliminating money laundering in cases where conflict minerals are illegally taxed or forcibly taken at mining sites or along shipping routes or where the trade, distribution, transport, or export of conflict minerals is detected, particularly when linked to money laundering;
- Cooperate with suppliers, national or international authorities, organizations, civil society groups, and, when necessary, affected third parties, to prevent and mitigate the risks of adverse impacts.

To ensure compliance with the Supplier Code of Conduct and regulations, the Company may regularly conduct third-party audits and on-site inspections through the supply chain.

### Compliance with the Environmental Law

Suppliers must have obtained all necessary permits, licenses, documents and approvals to operate their activities in compliance with applicable laws. It is the supplier's responsibility to maintain and comply with these permits, licenses, documents and approvals. Suppliers are obligated to provide the Company with up-to-date copies of all documents required in this regard as soon as possible, upon request.

In the course of their operations, suppliers must meet and comply with environmental laws and obligations regarding the management and disposal of hazardous materials, the release of pollutants into the air, soil and water, the protection of natural resources - wildlife and wetlands, the prohibition or restriction of certain substances, and the recycling of materials.

The Company expects all its suppliers to obtain the ISO 14001 Environmental Management Certification. Suppliers who do not have the relevant certification are expected to share documentation showing that they have initiated the process to obtain the certification with the Company as soon as possible, and to complete the process and obtain the certification by the targeted date.

### Air Emission Management

Suppliers must have taken precautions regarding fugitive emissions during any activity to complete the work. The tools, equipment, machinery and vehicles used must comply with the emission limit standards. Company vehicles must meet all required exhaust emission inspection standards.

Suppliers are obligated to provide the Company with up-to-date copies of all documents required in this regard as soon as possible, upon request.

### Chemical, Biological, Physical Risk Factors

Suppliers must protect their employees from all chemical, biological, physical hazards and physically demanding tasks in the workplace, as well as the risks associated with any infrastructure used by their employees. Suppliers will provide appropriate controls, necessary health screenings, safe working procedures, preventive maintenance and necessary technical protective measures to reduce workplace health and safety risks. The supplier must provide the necessary personal protective equipment for its employees after taking all the precautions included in the risk control hierarchy. Suppliers are required to comply with the guidelines and rules set by the Ministry of Health and other official institutions and organizations within the scope of the pandemic.

### Environmental Considerations in Decision-Making for Business Activities

Suppliers are required to systematically monitor and evaluate all processes in their supply chain proactively address environmental and sustainability concerns. Substances in the list of prohibited substances subject to permission given in the link below should not be used in the Company. <https://echa.europa.eu/candidate-list-table>

The Company may request suppliers to provide a declaration or a test report from an accredited laboratory demonstrating the compliance of the components (including packaging materials) that make up the products with the current REACH regulation, either with the initial shipments and/or at annual intervals.

If the components (including packaging materials) that make up the supplied products contain substances listed in the restricted and specific substances list, the Environment, Occupational Health and Safety (H&S) supplier information form must be completed and submitted for approval.

Materials, products and/or services provided or to be provided by the Supplier to the Company must comply with all relevant Environmental Legislation and if the aforementioned materials, products and/or services are related with European Union REACH and RoHS directives, must comply with these directives.

### Process Safety, Evaluation of Risks and Opportunities

Suppliers must have security programs that are already implemented and periodically updated in order to maintain all processes in accordance with current security standards. Security programs must include all supplier processes of production, delivery, installation, etc. Suppliers should evaluate risks and opportunities that may affect their customers or production processes.

Suppliers must conduct special risk analyzes for all machinery, equipment, processes, facilities and services provided to the Company, and ensuring appropriate emergency response plans for

earthquakes, chemical spills, explosions, fires, and other incidents. Occupational accidents are considered as an emergency at the Company.

The Company expects all its suppliers to obtain the ISO 45001 Occupational Health and Safety Management Certification. Suppliers who do not have the relevant certification are expected to share documentation showing that they have initiated the process to obtain the certification with the Company as soon as possible, and to complete the process and obtain the certification by the targeted date.

### Conservation of Resources and Climate Security

Suppliers are expected to use natural resources (eg. water, energy resources, raw materials) economically. If there are negative impacts on the environment and climate it will be managed by taking into account the following:

- Elimination of unnecessary processes / waste of resources,
- Reducing negative environmental impacts by material/machine etc. substitution
- Taking protective engineering measures,
- Improvement of production, maintenance and facility processes and procedures,
- Implementation of material reuse, recycling, recovery processes,

Suppliers must be sensitive to the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions. It will direct the service it offers and the machinery, equipment, etc. in the procurement process to products that will save resources, processes and services that will consume less resources, and will offer them to the Company as an option.

### Security

Suppliers must implement strong security practices in their supply chain. Suppliers must maintain process management and standards designed to ensure the integrity of every shipment sent to the Company, from origin to destination and at all transit points..

Suppliers are responsible to take the necessary and appropriate measures in their areas of responsibility to ensure that the Company's products, their workable components or raw materials, as well as relevant knowledge do not expire, and they do not leave the legal supply chain so that they do not fall into the hands of imitators or third parties.

Information, records, images, all kinds of documents belonging to the product, which are in the nature of trade secret, should never be shared with third parties except with the permission of the Company.

## MANAGEMENT SYSTEMS

Suppliers are expected to implement management systems that facilitate compliance with all applicable laws and to encourage continuous improvement in line with the expectations set out in this Supplier Code of Conduct. This includes the following aspects:

### Legal and Other Requirements

Suppliers must comply with all applicable laws, regulations, contractual agreements and generally accepted standards.

### Communication of Sustainability Criteria in the Supply Chain

Suppliers are responsible for ensuring compliance with the principles set out in this Supplier Code of Conduct in their own supply networks.

### Risk Management

Suppliers are expected to implement mechanisms to identify, decide and manage risks in all areas addressed by this Supplier Code of Conduct and in accordance with all applicable legal requirements.

### Documentation

Suppliers are expected to develop sufficient documentation to demonstrate that they share the principles and values expressed in this Supplier Code of Conduct.

### Training and Competency

Suppliers must establish appropriate training measures to ensure that their managers and employees have an adequate level of knowledge and understanding of this Supplier Code of Conduct, applicable laws regulations, and generally accepted standards.

### Continuous Improvement

Suppliers are expected to continuously improve their sustainability performance by taking appropriate action.

## INFORMATION DISCLOSURE

Suppliers shall promptly respond to information requests from the Company or an authorized third party contractually acting on behalf of the Company and confirmed in writing by the Company to act on behalf, regarding the issues within the scope of the Supplier Code of Conduct. The Company considers any violation of the Supplier Code of Conduct as a serious matter. Violation of the Supplier Code of Conduct will require the immediate creation of corrective action plans or training by the Supplier, without prejudice to the additional sanctions to be imposed by the Company. Failure to comply with the Supplier Code of Conduct may affect the position of the

supplier before the Company, cause disqualification from future opportunities with the Company, and may result in the termination of the Company's business relationship with the supplier.

Company reserves the right to hold the suppliers responsible for the reasonable costs of associated with investigating any non-compliance resulting from the supplier's nonconformity, as well as the costs of implementing appropriate corrective actions.

These Supplier Code of Conduct aim to facilitate improved communication by informing current and potential suppliers about the Company's standards and ethical expectations. Suppliers with questions regarding the Supplier Code of Conduct should contact the Company's Supply Chain Directorate at [SatinalmaGrubu@mutlu.com.tr](mailto:SatinalmaGrubu@mutlu.com.tr).

## **VIOLATION OF THE SUPPLIER CODE OF CONDUCT**

If the suppliers believe that their own actions or those of their employees have violated or may have violated the Supplier Code of Conduct, they should report this to the the Company's Supply Chain Directorate and/or to [hub@mutlu.com.tr](mailto:hub@mutlu.com.tr).

If suppliers suspect that another supplier of the Company is violating the Supplier Code of Conduct, they must report this immediately and appropriately, preferably in writing, to the Company's Supply Chain Directorate and/or to [hub@mutlu.com.tr](mailto:hub@mutlu.com.tr). Confidentiality will be maintained throughout the process, and the matter will be independently investigated.

Violation of the Supplier Code of Conduct is a serious matter and can result in serious sanctions, including termination of contracts. Certain violations of the Supplier Code of Conduct may also result in civil or criminal penalties.