

ETHICAL GUIDELINES AND WORKING PRINCIPLES FOR OUR SUPPLIERS

In order to develop sustainable relationships with our suppliers, our goal as Çolakoğlu® Metalurji A.Ş. is to create and encourage adherence to a framework that is informed by ethical guidelines and working principles.

Our suppliers are expected to conform to the ethical guidelines and working principles set out in this document, to self-assess their own performance and constantly improve it, and to make the same requirements of their own suppliers.

1. Management systems

Our suppliers should comply with local, national, and international laws, regulations, and administrative provisions in all processes involving the commercial, logistical, production, tax, human resources, and similar aspects of the goods and services with which they supply us.

Moreover they should also adhere to a management style which strives as much as possible to provide suitable working conditions and to protect the environment, which is mindful of contributing to economic and social development, and which is respectful of human rights and ethical values.

For this purpose they should install and operate management systems that conform to industry-recognized standards.

2. Freedom of association and the right to collective bargaining

Our suppliers should respect the rights of their employees to join or not to join labor/trade unions and to form such unions; they should comply with local and national laws pertaining to freedom of association and the right to collective bargaining.

3. Prevention of forced labor and exploitation of workers

Our suppliers must comply with local, national, and international laws, regulations, and administrative provisions pertaining to unfree labor and the exploitation of workers.

4. Prevention of child labor

Our suppliers must comply with local, national, and international laws, regulations, and administrative provisions pertaining to child labor.

5. Combatting discrimination

Our suppliers must strictly prevent any form of discrimination as well as verbal or physical abuse in their workplaces; they must prevent discrimination in their recruitment, placement, employment, training, remuneration, and promotion practices by basing such processes on the criteria of aptitude, performance, and experience instead.

6. Employee health and safety

Our suppliers should provide all of their employees with a workplace environment that is not detrimental to their health or safety and to internalize occupational health and safety practices that are based not just on published policies and practices but also on training and oversight; they must comply with local, national, and international laws, regulations, and administrative provisions pertaining to employee health and safety.

7. Working hours and remuneration

Our suppliers must fully comply with all laws, regulations, and administrative provisions pertaining to wage and salary payments, working hours, overtime, and fringe benefits and to provide working conditions and training that will allow their employees to develop their own knowledge, skills, and capacities.



8. Environment

In the conduct of all of their operations, our suppliers must display maximum care on matters involving the protection of the environment and to comply with local, national, and international laws, regulations, and administrative provisions pertaining to such issues.

9. Confidentiality

Our suppliers must acknowledge the confidentiality of any information concerning Çolakoğlu® Metalurji that they become aware of on account of their dealings with the company and to retain such information safely and securely. No such information may be divulged to any other party without the consent of Çolakoğlu® Metalurji.

10. Combatting extortion, bribery and other corrupt practices

Our suppliers must conform to laws as well as to ethical and professional guidelines and to universally recognized rules pertaining to extortion, bribery, and other corrupt practices; they should formulate policies as needed to prevent bribery and other corrupt practices and to make all of their own stakeholders aware of them.

Our suppliers must not propose or provide any gifts, monetary benefits, inducements, or other advantages to Çolakoğlu® Metalurji employees or to any other party, including but not limited to public officials and/or any other representatives of public agencies or organizations, if such offerings would cast suspicion on the recipient's impartiality, affect the ordinary performance of their duties, or violate existing laws; neither are they to accept such things. They must refrain from all forms of extortion such as racketeering and blackmail.

11. Conflicts of interest

There must exist no financial, kinship, or other relationship between any Çolakoğlu® Metalurji employee and supplier that would conflict or even appear to conflict with their obligations to act impartially and fairly in their dealings with one another. Whenever a supplier becomes aware that there exists a relationship of this nature between themselves and any Çolakoğlu® Metalurji employee, they must inform Çolakoğlu® Metalurji of the situation.

12. Transparency and candor

In their business relationships with their employees, business partners, suppliers, customers, competitors, other stakeholders, and society at large, our suppliers must not behave in any way whatsoever that would compromise feelings of mutual trust.

In order to establish and maintain a relationship based on mutual trust, suppliers are expected to provide Çolakoğlu® Metalurji with information and documents pertaining to the matters set out above whenever Çolakoğlu® Metalurji makes such a request.

Any information which Çolakoğlu® Metalurji may receive from suppliers as evidence of their fulfillment of and compliance with any matters dealt with in this document will be treated confidentially in order to develop opportunities to make further improvements.

10 October 2019

Uğur DALBELER

General Manager

