



**HABAS SINAİ VE TIBBİ GAZLAR İSTİHSAL
ENDÜSTRİSİ A.Ş**

Service-Quality-Reliability

SUPPLIER CODE OF CONDUCT AND COMPLIANCE DECLARATION

**December, 2024
EYS.FR.2000-1**



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INTRODUCTION

Habaş A.Ş. continues to be a leading steel producer in the international market in line with its ethical approach, complying with legal regulations and operating in a socially responsible manner. It is also committed to continuously improving sustainability in its operations and products. With this understanding, it expects the same high standards and principles from all business partners with whom it has commercial relations. Habaş A.Ş. accepts service and product providers and subcontractors as suppliers. The Supplier Code of Conduct aims to ensure that not only Habaş A.Ş. but also its suppliers operate in accordance with ethical, legal and sustainability standards.

All suppliers are expected to comply with the 10 principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and other relevant international norms. Suppliers will be responsible for ensuring that their companies, employees, suppliers and subcontractors understand and implement these rules. Habaş A.Ş. is committed to providing the necessary support to ensure that its business partners comply with these rules.

Compliance Obligations

Habaş A.Ş. suppliers are responsible for fully complying with national and international laws, regulations and other governmental and regulatory requirements in relation to themselves and their business processes. In addition, suppliers must strictly comply with the contractual requirements signed with them and with international standards and relevant regulations, in particular the International Labor Organization (ILO) and the Human Rights Convention.

Responsible Sourcing and Management System

Habaş A.Ş. considers that its suppliers have an appropriate documented management system(s), including the products it evaluates, and adopt responsible sourcing activities.

Habaş A.Ş. considers and encourages suppliers to have a documented quality, environmental and occupational health and safety management system in accordance with the principles of responsible sourcing and sustainability. (These systems may be based on ISO 9001, ISO 14001 and ISO 45001 standards).

Environment

Habaş A.Ş. is aware of its responsibility to protect the environment and expects its suppliers to regularly monitor their compliance with applicable environmental legislation, laws and requirements (including all laws related to air emissions, wastewater, toxic substances and hazardous waste discharge), to continuously improve their environmental management systems and to tackle challenges such as climate change.

Habaş A.Ş. considers its suppliers to measure, report and reduce their greenhouse gas emissions. Habaş A.Ş. also encourages its suppliers to use resources efficiently and expects them to conduct their activities in compliance with all applicable national and international environmental laws and regulations.



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Energy Efficiency and Sustainability

Habaş A.Ş. suppliers are aware of available energy resources. They look for opportunities to reduce greenhouse gas emissions in absolute terms. It considers suppliers to set targets and consider risks for energy management and efficiency.

Biodiversity and Ecotoxicity

Habaş A.Ş. expects its suppliers to identify potential biological, chemical and physical stressors to ecosystems and to proactively address chemical hazards in the supply chain by assessing these factors. It also considers the analysis of biodiversity and ecotoxicity impacts by suppliers to ensure the sustainability of habitats.

Human Rights and Working Conditions

- Suppliers must train their employees with dignity and respect accepted by the international community, taking into account human rights. Habaş A.Ş. suppliers must comply with the following standards.
- Suppliers shall not employ child labor in any form whatsoever, as defined by the ILO and the United Nations Assembly and/or laws.
- Forced, bonded and contractual labor or involuntary involuntary employment is strictly not permitted. Employment is voluntary.
- Suppliers must comply with laws, regulations and industry standards with regard to wages and benefits. Weekly wage and benefit payments must be at least at the minimum wage level and meet the basic needs of the worker and their family. Wages and benefits may not be deducted and may not be used as a measure of discipline, except as provided by applicable law.
- Suppliers must strictly adhere to laws and regulations prohibiting discrimination in hiring based on ethnic origin, religion, age, color, gender, sexual orientation, physical ability, health status and political opinion.
- Suppliers shall respect their employees' participation in trade unions and collective bargaining.
- Suppliers shall comply with the health and safety requirements of their employees in applicable laws, regulations and industry requirements.
- Suppliers are obliged to provide their employees with a working environment free from physical, mental, sexual or other harassment and any form of harassment.
- Suppliers must ensure that their workers have access to potable water and sanitation facilities, emergency medical care, adequate lighting and ventilation.
- Suppliers must comply with the legal working hours in the region in which they operate.



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Non-Financing of Terrorism and Conflict Areas

Habaş A.Ş. does not allow any party with which it has a business relationship to provide financial support to terrorism and does not act as an intermediary. Habaş A.Ş. complies with the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and requests that the parties with whom it has business relations comply with the same.

Honest and Ethical Business

Habaş A.Ş. suppliers must work at the highest ethical standards in their business. It is obliged to take into account the laws and legal regulations related to corruption, bribery, fraud, unfair and prohibited business practices, anti-corruption.

Prevention of Conflict of Interest

Habaş A.Ş. suppliers avoid actions that create a conflict of interest and any activity that may be perceived as a conflict of interest by third parties. In case of a potential conflict of interest, it must inform all relevant parties.

Storage of Records

Suppliers must prepare, record and store all information about the work performed accurately and honestly in accordance with current and applicable legal and regulatory requirements. They may not make any changes to the records and may make such records available to Habaş A.Ş. upon request.

Contact with Habaş A.S.

Habaş A.Ş. suppliers must conduct regular internal assessments to ensure compliance with these behaviors. Habaş A.Ş. reserves the right to conduct unannounced audits to verify compliance of its suppliers and facilities with this behavior. Based on all other contracts, Habaş A.Ş. may disconnect its suppliers if they do not comply with this behavior.

Rule Violations and Contact

Habaş A.Ş. reserves the right not to continue its relationship with the supplier in the event of a violation of this Code of Conduct by its suppliers.

Suppliers are obliged to notify Habaş A.Ş. if they witness, know or suspect any violation of the rules. Suppliers may contact Habaş A.Ş. Ethics Committee by phone at +90 232 625 11 70 and by e-mail at AAetikhbar@habas.com.tr in order to report suspicions and situations of possible violations within the scope of Habaş A.Ş. related activities.

Supplier Declaration

Habaş A.Ş. suppliers have read and understood the Code of Conduct and Compliance Declaration and undertake to fully comply with its principles and requirements as stated in their supply agreements with Habaş A.Ş. by the authorized signatory representing the company. Approves Habaş A.Ş. or a third party appointed by Habaş A.Ş. to conduct periodic, unannounced audits of compliance with the code of conduct at its facilities. It must effectively communicate the content of the code of conduct to its employees, agents, subcontractors and suppliers and ensure that all necessary measures are implemented. In



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addition, suppliers accept that compliance with this code of conduct is a prerequisite for business relations between Habaş A.Ş. and Habaş A.Ş. suppliers.

The most current version of the Supplier Code of Conduct and Compliance Declaration is publicly available on the Habaş A.Ş. [website](#).

Accepting Habaş A.Ş. Supplier Code of Conduct and Compliance Declaration;

Company Name :

Company Address :

Authorized Person Name Surname :

Authorized Person Signature :

Date :



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