

Doc. Ref.	<i>Akçansa Çimento San. ve Tic. A.Ş.</i>	Revision 00
EYS-ORT-01-P06	SUSTAINABLE SUPPLY CHAIN POLICY	Revision Date: 16/12/2022 Page: 1 / 2

Akçansa Çimento San. ve Tic. A.Ş.

We focus on creating a positive impact in a wide and comprehensive framework from environmental protection to social benefit in all regions where we operate. With our sustainability vision in this direction, we care about and support our suppliers, who are our important business partners, to act in line with our standards. We aim to make all our suppliers and subcontractors adopt this sustainability-oriented approach, to reduce environmental and social risks in our procurement and supply processes, and to increase our positive impacts throughout our value chain.

As Akçansa, we are committed to:

- ❖ evaluate our suppliers in terms of compliance with all our policies,
- ❖ set targets for the supply chain, to develop solutions against sustainability risks,
- ❖ include sustainability performance in purchasing processes as a success criterion,
- ❖ prioritize companies with high sustainability performance among our suppliers and subcontractors,
- ❖ prefer local suppliers and subcontractors if minimum conditions are met, to develop projects to ensure greater inclusion of women, youth and disadvantaged groups,
- ❖ regularly inform and to organize trainings in this context when necessary, in order to raise awareness of our suppliers and subcontractors on sustainability and improve their current performance,
- ❖ be in constant communication with our suppliers and subcontractors,
- ❖ review our policies and procedures periodically in order to ensure continuous improvement in purchasing processes,
- ❖ act in accordance with the Sabancı Group Responsible Investment Policy and Heidelberg Materials procurement guidelines

We oversee the compatibility of our suppliers and subcontractors to Akçansa Supplier Code of Conduct, which is prepared in accordance with the International Labor Organization (ILO) and United Nations (UN) Conventions, Heidelberg Materials Supplier Code of Conduct and all other applicable national laws and regulations, and includes the working conditions requirements, environmental standards and business ethics approach expected from our suppliers.

In this context, we expect our suppliers and subcontractors to:

- ❖ act in compliance with all Akçansa policies, Akçansa Supplier Code of Conduct and Heidelberg Materials Supplier Code of Conduct,
- ❖ strictly comply with the laws and regulations applicable in the regions where they operate, and to act in accordance with the applicable labor legislation on working hours, leaves, wages and fringe benefits,
- ❖ under no circumstances, employ child workers under the minimum working age defined in the International Labor Organization's Minimum Age Convention No. 138,
- ❖ under no circumstances, employ young employees in dangerous jobs and not to hinder their education,
- ❖ under no circumstances, employ forced labor or compulsory labor,
- ❖ provide a work environment worthy of human dignity by observing human rights, to ensure that the working environment has healthy and safe working conditions, to provide regular occupational health and safety trainings to their employees,
- ❖ remunerate their employees in accordance with at least the minimum wage, ensuring that holidays and vacation days are provided in accordance with laws and regulations, and that their working hours comply with the regulations,
- ❖ respect the right of employees to unionize and their decision to become a union member, their right to organize and collective bargaining in accordance with the law, and to provide a work environment where there is no threat of harassment and inhumane treatment to their employees,

Doc. Ref.	<i>Akçansa Çimento San. ve Tic. A.Ş.</i>	Revision 00
EYS-ORT-01-P06	SUSTAINABLE SUPPLY CHAIN POLICY	Revision Date: 16/12/2022 Page: 2 / 2

- ❖ under no circumstances, to discriminate based on race, language, religion, religious beliefs, sect, ethnic origin, age, duty, gender, gender identity, sexual orientation, color, physical characteristics, country of birth, marital status, pregnancy, dependents, disability, social class, union membership or political views,
- ❖ provide necessary instructions and implement controls to avoid any unlawful force or pressure if the suppliers are employing security service providers
- ❖ not accept nor give any gifts other than commercial traditions and promotional materials that would be inconsistent with the law, refrain from activities that exceed the purpose and that may cause conflict of interest, comply with all applicable international laws and regulations, including those related to the Anti-Corruption and Anti-Bribery laws,
- ❖ provide conditions where employees can report safely without being exposed to threats, intimidation, or intimidation in case of witnessing any illegal activity or ethical violation,
- ❖ follow the trade restrictions, export controls, embargo, corruption, and customs laws regarding their activities when necessary and undertake to act in accordance with such laws and regulations,
- ❖ not take any action that may cause inappropriate use of intellectual property rights, such as unauthorized disclosure of sensitive or confidential information, to comply with applicable privacy and data protection laws, and to ensure the protection, security, and legal use of personal data,
- ❖ fulfill all applicable legal environmental legislation compliance obligations in their activities, monitor and manage their environmental impacts regarding but not limited to natural resource consumption, carbon and other pollutant emissions, biodiversity, energy, water and wastes,
- ❖ promote safe and environmentally sound sourcing, manufacturing, transport, distribution, use and disposal of their products and services,
- ❖ follow energy and resource efficiency-oriented practices,
- ❖ observe safety and quality standards in products and services,
- ❖ take preventive measures against leakage or accidental spillage of chemicals and dangerous substances into the environment,
- ❖ comply with the Minamata Convention on Mercury if the supplier's operations include mercury and mercury compounds, mercury-added products or mercury wastes,
- ❖ comply with the Stockholm Convention on Persistent Organic Pollutants if the supplier's operations include chemicals and chemical wastes and stockpiles,
- ❖ comply with Article 4 (2), (5) and (8) of Basel Convention on the Control of Transboundary Movements of Hazardous Waste and their Disposal if the supplier's operations include hazardous and other waste shipments as defined by this Convention,
- ❖ implement the necessary systems to ensure business continuity, facilitate continuous improvement and comply with the expectations of these principles,
- ❖ act transparently and collaboratively within the scope of planned or unplanned audits and information requests to be carried out by Akçansa

In cases where non-compliance is detected with this policy, suppliers are contacted, and 12 months are given to take action, if technically feasible. Failure to rectify the detected violation after a maximum of 12 months will result in the dismissal, when deemed necessary, by evaluating the right to terminate the contract based on the re-evaluation of the business relationship with the supplier and subcontractors and the nature and size of the risk. The final decision regarding the dismissal is with the managers of the relevant business unit and/or the General Manager of the company.

Suppliers may submit any concerns regarding non-compliance to the following e-mail, mail addresses and telephone.

E-mail: etik@akçansa.com.tr

Address: Akçansa Çimento

Attn: Internal Audit Department

Barbaros Mahallesi Kardelen Sokak No:2 Daire: 124-125 Palladium Tower Ataşehir – İstanbul

Phone: 216-571 30 00