NORM HOLDING RESPONSIBLE PURCHASING POLICY

1. Objectives and Scope

- 1.1 As Norm Holding, while realizing our sustainable growth strategy, we aim to establish long-term business relationships based on mutual trust, cooperation and value creation with all our stakeholders in our supply chain in terms of sustainability management and its components, to increase sustainability awareness and to support our activities with exemplary approaches that are sensitive to the environment.
- 1.2 Accepting and complying with Norm Holding Responsible Purchasing Policy is a contractual obligation. In case of systematic serious violation of this Policy, Norm Holding has the right to terminate the contract with its suppliers. Likewise, Norm Holding expects its suppliers to inform their suppliers about the "Responsible Purchasing Policy" and to implement it. The policy is published on the Norm Holding website and is sent to the suppliers for information purposes.
- 1.3 Norm Holding adopts the principle of complying with high ethical and legal standards in all its operations. Employees and all other business partners who think that the Code of Conduct has been violated should report the issue to the Ethics Line managed by the third-party service provider as soon as possible.
- 1.4 Notifications can be made using the following communication channels:

e-mail: normholding@etikhat.com.tr

Telephone number: 444 3845

2. References

2.1 Norm Holding Code of Conduct

https://normholding.com/wp-

content/uploads/2022/07/norm_holding_etik_calisma_2022.pdf

2.2 Norm Holding Policies

https://normholding.com/en/corporate-governance-policies/

- 2.3 United Nations Universal Declaration of Human Rights
- 2.4 United Nations Guiding Principles on Business and Human Rights
- 2.5 United Nations Global Compact
- 2.6 ISO14001 Environmental Management System
- 2.7 ISO45001 Occupational Health and Safety Management System
- 2.8 ISO50001 Energy Management System
- 2.9 International Labor Organization (ILO) Conventions Declaration of Fundamental Principles and Rights in Working Life

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3. Working Conditions and Human Rights

- 3.1 Suppliers are expected to comply with the requirements of the United Nations Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work, and the international conventions of the country in which they are located. Suppliers are also encouraged to implement recognized health and safety management systems or guidelines while ensuring compliance with all relevant country and industry standards.
- 3.2 Companies are expected to establish systems that are compatible with all applicable laws and regulations regarding life and to create a fair working environment for the employees, do not discriminate among their employees, to attach importance to equal opportunities, values the ideas of their employees and to include them in continuous improvement activities, to protect the immunity and rights of their employees, to prevent forced or compulsory work, do not employ child labor, do not employ child labor.

4. Health and Safety

4.1 Suppliers are expected to have a policy to manage health and safety. A qualified staff member should have responsibility for assessing, monitoring and reporting the health and safety risks of daily activities. It should provide workers with clear instructions and information on work hazards, risks, hazards and precautions and emergency procedures to deal with risks.

5. Work Ethics

5.1 Suppliers must comply with all local and international legislation related to their industry in terms of business practices and ethical standards. There should be 'zero tolerance' to corruption or bribery and suppliers are expected to disclose any circumstances that give rise to a conflict of interest.

6. Environment

6.1 The commitment to environmental protection should be reflected in the implementation of environmental policies and management systems. Measures should be taken to monitor and reduce adverse effects on the environment, including responsible management of chemical and hazardous substances, pre-

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treatment of discharge before disposal, and reduction of emissions and water consumption.

7. Supplier Management

7.1 It is important for all organizations to build close relationships with their suppliers as this will enable them to understand and then reduce supply chain risk. Suppliers must be aware of industry requirements and international standards regarding sustainability. Every company should have measures in place to ensure the social, environmental and business behavior and compliance of its suppliers.

8. Responsible Raw Material Procurement

8.1 Companies are expected to take due care to understand the source of the raw materials used in their products and not knowingly provide products that contain raw materials that contribute to human rights violations, bribery and ethical violations, or that adversely affect the environment. This extends to the industriousness of conflict minerals.

9. Enforcement and Implementation

- 9.1 A correction plan is requested for compliance with the policy from suppliers that have been penalized or any non-compliance detected in the above-mentioned issues.
- 9.2 As Norm Holding, we are committed to giving priority to working with suppliers who do not accept the compliance process and/or do not make improvements within the specified time, evaluate them within the scope of our procedure and provide feedback, and give priority to working with suppliers that exhibit positive social and environmental performance and whose performances are confirmed by third institutions/external stakeholders.
- 9.3 This Policy is published by the Corporate Governance Committee, and its announcement and subsequent amendments come into force with the decision of the Board of Directors after the evaluation of the Executive Board.