

ZORLU ENERJİ SUSTAINABLE SUPPLY CHAIN POLICY

As Zorlu Enerji, we strive to establish strong relationships based on trust and create sustainable value with all our stakeholders. We consider it among our main responsibilities to observe and ensure the compliance of our suppliers, who are our important business partners, with environmental, social and ethical standards. In this context, we adopt a responsible supply chain approach by reflecting our sustainability approach to all our suppliers and subcontractors.

Significant Suppliers

This category includes main equipment and service providers essential for the continuity of our production processes, strategic partners with whom we maintain long-term collaborations for the maintenance, development, and management of our operations, and suppliers with an annual transaction volume exceeding TRY 10 million.

Strategic (Unique) Suppliers

This group comprises suppliers identified as carrying high risk in terms of adverse environmental, social, and governance (ESG) impacts, and/or those who are of critical importance for the business continuity of the company.

In this context, we adopt a responsible supply chain approach by reflecting our sustainability approach to all our suppliers and subcontractors.

In line with this approach, in our entire value chain,

- Informing, raising awareness and organizing trainings when deemed necessary in order to raise awareness about our sustainable supply chain management,
- Evaluating our suppliers in terms of their environmental and social performance in purchasing processes (desk or on-site), developing corrective/improvement action plans as part of development programs and supporting suppliers in the implementation of these action plans,
- Giving priority to suppliers who manage their environmental and social impacts, give importance to the development of their employees and society, and develop sustainability practices,
- Preferring local suppliers if they meet the requirements,
- Reviewing and reorganizing periodically in order to continuously improve our purchasing processes,
- Continuously providing and improving supplier communication with different communication channels,



- Ensuring the compliance of suppliers with minimum environmental, social, and governance (ESG) criteria is mandatory; in the event of non-compliance, the company reserves the right to terminate the contract, without prejudice to any other contractual rights and remedies.

We continue to work to fulfil our commitments on their subject.

With our sustainable supply chain policy, we observe the compliance of our suppliers and business partners with, Zorlu Holding Procurement Principles (Principles), which includes the expected basic rules of behaviour, the International Labor Organization (“ILO”) and the United Nations (“UN”) Conventions, prepared in the light of all applicable national laws and regulations,

Zorlu Holding Procurement Principles covers the procurement operations of all Zorlu Group Companies and expected basic behaviour rules from our suppliers

In this scope, we are committed our cooperation for expectations from our suppliers and business partners that are stated below;

- To act in compliance with all of Zorlu Enerji’s policies,
- Not accept child labor or any form of exploitation of children and not to employ child workers below the minimum working age defined in Article 138 of the International Labor Organization Convention,
- Not to employ their young employees in dangerous jobs and not to hinder their education,
- Not to employ forced or compulsory workers,
- Not to employ any employee without assurance,
- Not accepting the payment of debts by labor under any circumstances,
- To treats its employees with the highest ethical standards and not to discriminate based on race, ethnicity, gender, gender identity, sexual orientation, color, religion, country of birth, marital status, pregnancy, dependents, age, duty, disability, social class, union membership or political views,
- Observe human rights, operate with a business approach that suits human and human dignity,
- Not to accept any form of physical abuse, sexual, verbal or physical harassment and intimidation in the workplace,
- To act fairly in all business relations in accordance with basic moral and human value judgments,
- We expect our suppliers to ensure that the wages paid to their employees do not merely meet the legal minimum limits, but also observe the ‘living wage’ levels that cover the basic needs (food, housing, healthcare, etc.) of employees and their families, providing them with a dignified life (as defined in the Universal Declaration of Human Rights); they must also ensure that all fringe benefits comply with the rules set by laws and regulations, and that payments are made regularly, timely, and fairly.

- Ensuring that all employees receive vacation and leave entitlements as mandated by law, and maintaining full compliance of working hours with applicable regulations,
- We expect our suppliers to ensure that working hours do not exceed legal limits, that overtime practices are based on voluntarism, and that they maintain full compliance with international standards (ILO) by providing employees with at least one day of rest per week.
- In cases where suppliers provide housing or accommodation to their employees, we require these areas to meet acceptable living conditions by being clean, safe, respectful of privacy, and providing sufficient space while meeting basic human needs (such as hot water, hygiene, ventilation, etc.).
- Respect the rights of their employees to join labor unions (freedom of association), become members, be represented, participate in worker councils, and engage in collective bargaining as defined by local laws
- Observe the rules of occupational health and safety in the workplace, take all necessary precautions, and provide regular occupational health and safety trainings to their employees,
- To act in an environmentally responsible manner and complying with all applicable laws, regulations and legislation (including all laws regarding greenhouse gas emissions and energy consumption, pollution prevention and waste management, resource efficiency, biodiversity, prevention of deforestation and land protection, waste water, chemicals) to comply with the regulations, to make continuous improvements and to carry out studies to minimize the environmental impact and pollution resulting from their activities within the scope of local, regional and global environmental problems To strictly comply with Zorlu Holding and Zorlu Enerji's Code of Ethics in the fight against bribery and corruption, not to give or receive gifts for business facilitation, to avoid situations that may cause conflict of interest, not to attempt to distort, prevent or limit competition, and to observe the intellectual property rights of their business partners.
- Sharing documents showing compliance with the principles in a transparent manner, when necessary, within the scope of supplier audits.



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