



## SUPPLIER CODE OF CONDUCT POLICY

### Scope

As Turkish Technic, we hereby declare the Supplier Code of Conduct Policy to guide all our purchasing suppliers we collaborate with during aircraft maintenance activities, in accordance with national and international standards, and to emphasize the principles of the Business Conduct and Ethics Manual (Code of Ethics).

The Supplier Code of Conduct Policy outlined in this document is based on the Turkish Technic Business Conduct and Ethics Manual (Code of Ethics). As Turkish Technic, we expect all suppliers on the procurement department's supplier list to comply with the principles of the Business Ethics and Code of Conduct Manual (Code of Ethics) within the scope of applicable law and Company procedures.

As Turkish Technic, we aim to collaborate with suppliers who will further enhance the sustainability performance within the supply chain. In this context, the Supplier Code of Conduct Policy summarizes the minimum standards of conduct for all suppliers within the purchasing departments. As Turkish Technic, we expect our suppliers to comply with the Supplier Code of Conduct Policy, in addition to quality and commercial factors, and to engage in transparent operations, fostering open dialogue regarding any challenges encountered.

### Compliance with Laws

As Turkish Technic, we consider compliance with international and local laws and regulations in all the countries where we operate as one of our primary responsibilities. This is also highlighted under the 5. Compliance with Laws section in the Business Conduct and Ethics Manual (Code of Ethics). As part of our corporate responsibility, we expect the suppliers we collaborate with to comply with all international and local laws and regulations, including those of the countries where they operate or provide services.

### Respect for Human Rights

As Turkish Technic, we consider respecting human rights and providing services in accordance with international labor standards as our fundamental principle. In all areas of our operations, we consider the health, safety, dignity, and well-being of our employees, customers, business partners, contractors, and everyone affected by our activities as our highest priority. We expect our suppliers to provide services in compliance with international labor standards and to create a respectful work environment that protects human rights.

## **Equality-Fair Treatment**

As Turkish Technic, in line with the principle of Equality and Fair Treatment, which is based on the Honesty and Fair Dealing section of the Business Conduct and Ethics Manual (Code of Ethics) under the heading 1. Our Core Values and Principles, we expect our suppliers to treat their employees with dignity, respect, and fairness, regardless of race, color, religion, gender, or age, and to create an inclusive work environment.

As outlined in section 6.2 of the Business Conduct and Ethics Manual (Code of Ethics) on Equal Opportunity and Nondiscrimination, Turkish Technic does not tolerate discrimination. We expect our suppliers to refrain from discrimination based on race, national, ethnic or social origin, caste, birth, religion, disability (as defined in the International Labour Organization (ILO) Convention C159), gender, family responsibilities, or marital status in hiring, compensation, access to training, promotion, dismissal, or retirement matters.

Turkish Technic expects its suppliers to treat their employees with dignity, respect, and fairness. It expects its suppliers to provide equal opportunities and treatment to all employees regardless of race, color, religion, gender, or age difference (as defined in International Labour Organization (ILO) Convention C111), It expects him to provide an inclusive work environment free from discrimination and harassment, establish effective mechanisms to protect against these, and respect freedom of association and the right to collective bargaining.

As Turkish Technic, we expect our suppliers to listen to employee complaints and establish appropriate communication and complaint mechanisms to resolve issues effectively.

## **Child Labor and Illegal Employment**

As Turkish Technic, we expect our suppliers to comply with national and international laws and regulations (as defined in International Labour Organization (ILO) Conventions C138 and C182) regarding the use of child labor. In accordance with the legislation of all countries where operations are carried out, we expect compliance with the minimum employment age defined by law or regulation, as well as adherence to the relevant International Labor Organization (ILO) standards.

## **Forced Labor, Modern Slavery and Human Trafficking**

No one under the umbrella of Turkish Technic shall be forced to work against their will or have their legal rights obstructed.

As Turkish Technic, we expect our suppliers to refrain from employing any individual against their will, obstructing their legal rights, or engaging in illegal employment practices.

Turkish Technic commits to resolutely combating all forms of modern slavery, including human trafficking and forced or compulsory labor, with determination and taking all necessary measures. Turkish Technic expects its suppliers to take all necessary measures as well.

Turkish Technic absolutely expects its suppliers to fully comply with the Supplier Code of Conduct Policy specified in this document, as well as all applicable national and international regulations regarding modern slavery, human trafficking, occupational health and safety, respect for human rights, equality, and child labor, while carrying out their activities, products, and services.

## **Wages and Working Hours**

As Turkish Technic, we expect our suppliers to pay their employees at least the minimum wage set by the laws of the regions in which they operate and to comply with legal working hours. We also expect all employee rights, including but not limited to annual leave, overtime, and maternity leave, to be granted in accordance with labor laws and other relevant regulations, and to be used in compliance with applicable laws and regulations.

## **Sanctions and Compliance with Trade Restrictions**

As Turkish Technic, we prioritize compliance with all applicable economic and trade sanctions, export and import restrictions, and regulations, including the U.S. and European Union sanctions and export control laws governing the transfer of specific technical data, equipment, and technologies between countries.

We expect our suppliers to understand the export control laws and economic sanction requirements of the countries in which they operate and to carry out their export activities in compliance with the applicable laws and regulations in each country. Additional obligations regarding compliance with sanctions and trade restrictions are outlined under the "Sanctions and Compliance with Trade Restrictions" section of the Business Conduct and Ethics Manual (Code of Ethics).

## **Bribery and Corruption**

Bribery and Corruption is outlined under section 10.1 of the Business Conduct and Ethics Manual (Code of Ethics). According to this regulation, no employee or third party shall be provided with any form of bribe, commission, exemption, or any other benefit under any name. We expect suppliers to refrain from offering or accepting gifts or payments that could be perceived as bribery, informal commissions, or illegal, improper, or unauthorized payments.

In accordance with the Business Conduct and Ethics Manual (Code of Ethics), section 9. Anti-Money Laundering and section 10.1 Anti-Bribery and Corruption, suppliers must not be involved in any actions related to corruption, fraud, or money laundering. We expect suppliers to implement a zero-tolerance policy regarding these matters and, particularly in relation to any business initiatives they provide to Turkish Technic to conduct necessary due diligence and develop an appropriate risk management plan.

As Turkish Technic, we expect suppliers not to use gifts, hospitality, or other commercial incentives to gain an unfair competitive advantage. They should refrain from engaging in hospitality activities that are non-compliant with applicable laws and exceed their intended purpose. The acceptance of gifts, invitations, credits, and other incentives is governed under section 10.2 Gifts, Entertainments, and Other Business Courtesies of the Business Conduct and Ethics Manual (Code of Ethics).

Conflict of Interest

## **Conflict of Interest**

Conflict of Interest is outlined under section 10.3 Avoiding Conflicts of Interest of the Business Conduct and Ethics Manual (Code of Ethics).

We expect suppliers to ensure that they have no personal interests in their relationship with Turkish Technic that their duties towards Turkish Technic do not conflict, and that there are no situations that could be perceived as a conflict of interest by third parties. In the event of a potential conflict of interest, suppliers are expected to promptly notify all affected parties.

## **Fair Competition**

As Turkish Technic, we promote fair competition and support the development of competition law in accordance with the provisions outlined in section 11 Fair Dealing and Fair Competition of the Business Conduct and Ethics Manual (Code of Ethics). In this regard, we expect all suppliers to act in compliance with local laws and international standards, and to refrain from engaging in activities that restrict competition, unfair competitive practices, or deceptive actions.

## **Occupational Health and Safety**

All companies providing services to Turkish Technic are required to comply with national and international regulations, as well as the company's rules and policies, including the provisions of the Occupational Health and Safety Law No. 6331 and its associated regulations, and the rules outlined in section 6.5 Maintaining a Safe and Secure Workplace of the Business Conduct and Ethics Manual (Code of Ethics).

As Turkish Technic, we encourage suppliers to obtain the ISO 45001 Occupational Health and Safety Management System Certificate or an equivalent certification. We expect suppliers to take all necessary preventive and protective measures to prevent workplace accidents and harm to employee health, support activities that raise safety awareness, and engage in efforts to reduce workplace accidents and occupational diseases.

## **Environmental Protection**

As Turkish Technic, we expect suppliers to comply with the environmental regulations they are obligated to follow in the execution of their activities, products, and services, to adhere to national and international requirements, and to adopt a proactive approach to minimize their environmental impact. We encourage suppliers to obtain the ISO 14001 Environmental Management System Certificate or an equivalent certification to eliminate, minimize, and control their significant environmental impacts.

As Turkish Technic, we expect our suppliers to comply with all commitments stated in the Environmental Policy, Biodiversity Policy, and Sustainability Policy, as well as the rules outlined under section 12.1 Sustainability of the Business Conduct and Ethics Manual (Code of Ethics).

Furthermore, Turkish Technic expects its suppliers to support initiatives related to fuel efficiency to mitigate and eliminate factors that may contribute to climate change. It expects them to take active measures for the conservation, recovery, reuse of natural resources and pollution prevention. It supports renewable energy projects and applications to increase resource and energy efficiency, reduce consumption and greenhouse gas emissions. By identifying the environmental dimensions and impacts resulting from all its activities, products, and services, it develops action plans to prevent, reduce, and, if possible, eliminate all negative environmental impacts at the source throughout the life cycle. It expects its suppliers to act with awareness of their impact on local pollution and to take measures to prevent noise pollution, water emissions, odor emissions, and waste generation. It expects them to take care to take measures to protect the ecosystem and biodiversity.

## **Keeping Books and Records Accurately**

As Turkish Technic, we expect suppliers to maintain all financial transactions and information, including reports, presentations, financial statements, and notes to be submitted to the relevant authorities, in accordance with laws, policies, and procedures, ensuring accuracy, completeness, and transparency. Other matters related to the accurate maintenance of records and books are outlined under section 10.8 Truthful and Accurate Reporting of the Business Conduct and Ethics Manual (Code of Ethics).

## **Protection of Personal Data and Confidentiality**

As Turkish Technic, we require suppliers to take the necessary measures in compliance with the principles, rules, and procedures set forth in applicable national and international personal data protection legislation, including the Personal Data Protection Law No. 6698 and the European Union General Data Protection Regulation. Regulations concerning the protection of personal data and confidentiality are outlined under section 7. Protecting Confidential Information of the Business Conduct and Ethics Manual (Code of Ethics).

We expect suppliers to exercise due care regarding all information related to trade secrets, critical data, confidential information, and personal data belonging to Turkish Technic, and to take all necessary technical and administrative measures to ensure the appropriate security level for the storage and protection of this information in compliance with legal requirements.

Suppliers are required to sign contracts and protocols provided by Turkish Technic to ensure the protection of personal data and confidentiality in accordance with the necessary protection standards. If suppliers subcontract the services they provide to Turkish Technic to third-party companies, we expect those third parties to commit to the same level of protection and to sign contracts and protocols that ensure compliance with the relevant personal data protection legislation.

We expect suppliers to prevent any unlawful access to data by employees or third parties and to prevent the unlawful use of such data beyond the intended purpose of its transfer.

We expect suppliers to transfer personal data of their employees and, if applicable, subcontractor employees, to Turkish Technic in accordance with relevant legislation by ensuring the appropriate legal framework for such transfers.

We expect suppliers to obtain confidentiality and access to personal data commitments from their employees and, if applicable, subcontractor employees who have or will have access to personal data under the responsibility of Turkish Technic, and to provide regular training to their employees on personal data protection and information security.

Suppliers are aware that they are responsible for any damages arising from activities that violate personal data protection legislation concerning their employees or subcontractor employees.

## **Information Abuse**

Information misuse is addressed under section 10.3.3 Personal Business Relationships, Investments, and Insider Trading of the Business Conduct and Ethics Manual (Code of Ethics). As Turkish Technic, we do not tolerate the use or facilitation of any non-public information for trading or enabling others to trade shares or securities of any company.

## **Reporting**

As Turkish Technic, the policy we have published serves as a summary guide and does not encompass all necessary legal and ethical standards. In the event of any violation of this document or any applicable regulations, we expect suppliers to report the situation to us immediately.

In case of any violation of this summarized policy, including other applicable regulations, suppliers are expected to report the situation through the purchase contact person or via email to 'ttethics.com', Ethics Line e-mail address of the independent consultancy firm or through the +90 (850) 281 50 88 telephone number. All notifications sent to this address will be treated anonymously, and the processes related to the notifications will be handled with confidentiality.

Turkish Technic may reconsider its relationship with a supplier who does not comply with the Supplier Code of Conduct Policy or fails to meet the minimum requirements.

### **Responsibility and Review**

This policy is reviewed once a year by the Purchasing Department under the continuous improvement approach and updated if deemed necessary, in line with changing conditions.

**e-signed**  
**Mikail AKBULUT**  
**Accountable Manager**