

1.0 INTRODUCTION

NEDEX's goal is to be a leader in sustainability in our industry. This requires us to respect and take responsibility for the economic, environmental and social impacts of our business together with our suppliers, customers and other business partners (hereinafter referred to as "business partners"). Effective cooperation with business partners is an indispensable condition of our operations. In many cases, NEDEX' business partners are also the face of NEDEX to the world. Business partners shall comply with the requirements of NEDEX' "Code of Ethics for Business Partners" (hereinafter referred to as "CoE"). Business partners will work together to meet requirements both within their own organization and across their partner chain. CoE also applies subcontractors, consultants, distributors and agents.

NEDEX encourages its business partners to strive for continuous improvement and to work with management systems and standards in the areas described in the CoE. Business partners should have an incident management system to handle and prevent incidents. Specific sustainability requirements and targets can be defined with business partners. CoE is based on established international frameworks (see 3.1). We believe that reducing environmental impact and ensuring the health and safety of our employees also creates long-term value for our business partners. NEDEX is focused on success in shaping the future using sustainable business models.

We attach great importance to ensuring that our activities and business relationships comply with applicable laws and regulations. That's why we've decided to publish and share our own set of rules.

Our set of rules forms an important part of our cooperation with business partners, and we consider these rules to be a natural element of our ongoing dialogue with business partners.

2.0 PURPOSE

As NEDEX, we are aware that ethical and responsible behavior that respects society, people and the environment is the most important tool in achieving our goals. We know that we can achieve our goals by working together with business partners, and with this document, we explain how we expect our business partners to work with us regarding ethical rules, compliance with the law, anti-corruption, employee conditions, occupational health and safety, environment and sustainability issues.

3.0 SCOPE

All suppliers, customers, sellers, consultants, representatives and all other goods and service providers doing business with NEDEX are within the scope of CoE.

3.1 Compliance with international frameworks and applicable legislation

CoE reflects NEDEX' commitments to the UN Global Compact, the OECD Guidelines on Multinational Enterprises and the UN Guidelines on Business and Human Rights.

The goods and services provided will be under conditions consistent with the following:

- United Nations Universal Declaration of Human Rights (1948)
- International Labor Organization ; 8 Fundamental Convention, no. 29, 87, 98, 100, 105, 111, 138 and 182
- United Nations Convention on the Rights of the Child, article 32
- Labour protection and working environment legislation in force in the country of production
- Labor law and social welfare protection regulations in force in the country of production
- Environmental protection legislation in force in the country of production
- UN Declaration Against Corruption

Business partners must comply with the laws and regulations in the countries in which they operate and must obtain all licenses/permits relevant to their business. If existing law imposes higher requirements than those described in this SPEC, business partners must comply with applicable law. Business partners must be able to demonstrate that they have fulfilled legal obligations regarding the payment of taxes and social welfare contributions.

4.0 BUSINESS PARTNERS CODE OF CONDUCT

4.1 COMPLIANCE WITH LAWS AND REGULATIONS

Business partners must act in accordance with all applicable legislation in their commercial activities and must not engage in anti-competitive actions.

4.2 WORKING CONDITIONS

4.2.1 Human Rights

Business partners must respect each individual's dignity, privacy, freedom of expression and rights.

4.2.2 Right to Organize

Business partners must recognize their employees' rights to organize and collective bargaining in accordance with the law, and must not discriminate or pressure their employees due to their participation in such legal organizations or unions.

4.2.3 Disciplinary Practices

Business partners must treat all employees with dignity and respect and must not apply or allow physical punishment. It must provide conditions that prevent sexual harassment, sexual abuse, verbal harassment, moral or physical coercion and any similar treatment.

4.2.4 Fair Working Conditions

Business partners must act in accordance with the legislation in paying employees the wages they deserve and charging compulsory and overtime hours.

4.2.5 Discrimination

Work partners should not discriminate persons; in all employment-related decisions such as recruitment, promotion, compensation, fringe benefits, training, compulsory dismissal, termination of employment; based on language, race, colour, gender, disability, political opinion, philosophical belief, religion and sect and similar reasons.

4.2.6 Working Hours

Business partners must act in accordance with the applicable legislation on matters related to working order, especially working hours and overtime.

4.2.7 Fees and Payments

The wages, overtime or all wage-related rights paid by business partners to their employees must be equal to or greater than the amounts determined in accordance with the applicable Labor Law and other relevant legislation.

4.2.8 Forced Labor

Business partners must use only volunteer labor and employ personnel who wish to work of their own free will. They must not threaten or force their staff to work, make false claims or use any other form of coercion.

4.2.9 Child and Youth Labor Force

Business partners should not employ people who have not completed their compulsory education and are under the age of eighteen , unless a higher age limit is specified in the legislation.

4.2.10 Prevention of Psychological Pressure

The obligations of business partners in this regard are listed below.

- not to violate the immunities of employees in any way through physical, sexual, psychological or emotional harassment in the workplace or anywhere they are for business purposes,
- to prevent events or behaviors contrary to law and ethical rules,
- not to ignore the psychological pressure put on the employee,
- not to take actions and practices that protect, encourage and facilitate those who do these things,
- to take measures to prevent psychological harassment from occurring.

4.2.11 Training and Development

NEDEX attaches importance to the development of employees' skills and competencies.

Business partners should have routines in place to ensure staff have the relevant permits/licences, professional training and qualifications to perform their work. Staff must receive training and instruction regarding any health risks the work may pose, including fire safety, hazardous work activities and first aid. Business partners must provide appropriate

personal protective equipment and work tools and ensure that health and safety information is easily accessible in the workplace.

Work premises should be provided with adequate fire safety and emergency evacuation facilities, taking into account the nature of operations and the risk of fire and other hazards. Emergency exits should be clearly marked, illuminated and not blocked. Evacuation drills and testing of fire alarms should be conducted regularly.

4.2.12 Zero tolerance for alcohol and drugs

All work must be performed without the influence of alcohol or drugs. If alcohol or drug use is suspected or confirmed, this should be addressed in accordance with specific treatment programs.

4.3 CODE OF ETHICS

4.3.1 Confidentiality and Protection of Trade Secrets

The obligations of business partners in this regard are listed below.

- to keep documents, commercial or technical information received from NEDEX on a confidential basis,
- to consider all confidential documents, designs, projects, information and information about NEDEX as company secrets,
- to keep confidential all information, methods or ideas, applications, inventions, designs, products or similar that are not yet known in the field of industry that provide NEDEX with a competitive advantage.
- to keep such information and documents confidential from third parties without NEDEX written approval.

4.3.2 Conflict of Interest

Business partners avoid actions that create incompatibility with NEDEX, unfair competition or conflict of interest, and do not use NEDEX' assets such as information, documents and all kinds of infrastructure support for their own benefit.

4.3.3 Fighting Bribery and Corruption

Business partners do not give or offer bribes, payments or anything of value to institutions, organizations or natural persons, or accept payments from institutions, organizations or individuals for this purpose. Business partners do not tolerate bribery and corruption in any way and act consistently and sensitively on these issues.

4.3.4 Business Records

It is essential to keep accurate, complete and honest records in order to fulfill the obligations under the legislation.

Reports, presentations, financial statements, footnotes, all kinds of books and records must be prepared accurately, completely and transparently by NEDEX for presentation to the

public, investors and competent authorities. NEDEX expects its business partners to keep books and records in accordance with the same principles.

4.3.5 Receiving and Giving Gifts

Gifts and assets that may give rise to the impression of an irregularity, cause a dependency relationship or be perceived as such are not sent or accepted by business partners or NEDEX employees. Promotional and customary materials and gifts of insignificant financial value such as promotional items, calendars and agendas are not included in this scope.

4.3.6 Entrusted Goods

Business partners can provide product samples, hand tools, equipment, sub-materials, etc. entrusted to them by NEDEX for production or testing purposes in line with the needs. They protect such assets and prevent them from being used for their personal purposes or the personal interests of third parties outside of NEDEX services.

4.4 OCCUPATIONAL HEALTH AND SAFETY

NEDEX and its business partners;

- attach importance to the compliance of their employees and visitors with the rules regarding legal regulations in the field of Occupational Health and Safety,
- create safe and healthy working environments by implementing an effective occupational health and safety management system,
- do not employ undocumented people in jobs that require vocational training,
- control the dangers that their employees and visitors may be exposed to,
- take the best possible precautions against accidents and workplace-related diseases,
- train their employees and new hires on occupational health and safety measures by providing training opportunities,
- ensure the continuity of this training and implementing the determined measures.

4.5 PROTECTING THE ENVIRONMENT

NEDEX and its business partners;

- attach great importance to the protection of the environment,
- pay attention to minimizing the impact of their production processes and products on the environment,
- strive for sustainability,
- comply with the principles determined by the United Nations Global Compact
- expect and control each other to comply with their obligations.

In this context, NEDEX and its business partners;

- must strive to use resources efficiently and minimize pollution,
- design and develop products by taking into account their impact on the environment and their potential for reuse or recycling,

- must manage the treatment and disposal of waste in the best possible way, in accordance with the legislation in force,
- avoid using hazardous and potentially hazardous substances defined in the current legislation,
- take into account environmental impacts in logistics management,
- accept that climate change is a global existential threat,
- should work on the transformation to an economy that does not consume carbon-based fuels,
- work on measuring and reducing their carbon footprint,
- follow current developments regarding energy efficiency and carry out studies.

4.6 MONITORING THE RULES AND REPORTING VIOLATIONS

The business relationship between NEDEX and business partners will be based on honesty, trust and cooperation. Business partners will allow their working environments and production facilities to be subject to social audits for compliance with this CoE, if requested by NEDEX. Follow-up may take place in the form of self-assessments and/or through on-site inspections performed by NEDEX personnel or a third party appointed or approved by NEDEX. Inspections include interviews with employers as well as a health and safety audit.

Business partners allow access to facilities and relevant information and documents during regular and/or unannounced inspections. NEDEX reserves the right to terminate the business relationship with the violating business partner if the partner violates any of the principles set out in this CoE.

Company name :

Address :

Date :

Authorized Person Name and Surname:

Signature/Stamp: