



SUPPLIER CODE OF CONDUCT

In today's world where there are many environmental and social challenges caused by urbanization, increasing population, deterioration of technology and global warming, Deltal Otomotiv as a company has the responsibility of making a positive contribution to the society and all its stakeholders.

As Deltal Otomotiv, we are determined to conduct our business with integrity, to offer quality products to our customers and to serve the common interests of our external stakeholders.

Deltal Otomotiv, while adhering to sustainability standards such as social and environmental responsibility and ethical behavior, expects its suppliers to support the same sustainable approach.

Deltal Otomotiv Supplier Code of Conduct is built on the requirements set by our customers to whom we supply products. Where differences arise between standards and legal requirements, the stricter standard will be applied in accordance with applicable law.

This Supplier Code of Conduct is updated regularly and is available on the Deltal Otomotiv website. Our suppliers establish a common set of key references that apply to their sub-supplier.

Deltal Otomotiv Supplier Code of Conduct is categorized into four sections:

- Human Rights and Working Conditions
- Health and Safety
- Environmental
- Business Ethics

In addition, Deltal Otomotiv has established a grievance mechanism policy for suppliers to contact to report their concerns about a possible violation of law, regulation or policy.

It shall also ensure that our suppliers apply these standards to their suppliers and subcontractors and follow binding requirements.

I. Human Rights And Working Conditions

1. Ethical Recruitment

The Business Partner must adhere to ethical recruitment principles in accordance with the UN Guiding Principles on Business and Human Rights, treat potential employees with dignity and respect, and manage their recruitment processes in compliance with regulations and standards.

2. Non-Discrimination

Suppliers must commit to a workforce that is free from language, religion, race, nationality, gender, social class, marital status, pregnancy, physical disability. Companies shall not consider these discriminatory elements in their hiring and employment practices, such as wages, promotions, rewards and access to training.

3. Prevention of Child and Youth Labor

It must not support or allow child and youth labor and act in accordance with regulations. Child labor should not be employed at any stage of production. Workers under the age of 18 (Young Workers) shall not do work that may endanger their health and safety. Workers under the age of 18 are also not allowed to work night shifts and overtime unless permitted by law.

4. Freedom of Choice of Work

The Business Partner cannot request any employee to submit identity documents, passports, work permits as a prerequisite for employment, and should take into account that each employee has the freedom to terminate the employment contract within a reasonable time.

5. Prevention of Forced and Compulsory Labor

Suppliers should take care to employ their employees voluntarily in appropriate positions and under equal conditions, and should avoid forced, coerced or debt-based employment.

6. Working Hours and Compensation

Suppliers must comply with the legal regulations, practices and provisions of the collective bargaining agreement, if any, for working hours, compensation, and ensure regular rest and leave use for a fair and efficient working environment.

7. Wages and Benefits

Our business partner must provide all employees with wages and social benefits determined within the framework of the law.

8. Gender equality

As a fair company, the supplier must keep its employees entitled to the same opportunities, skills and knowledge, be committed to gender equality and promote women's rights.

9. Diversity, Equity, and Inclusion

Our supplier must value diversity within the company, develop and promote inclusive cultures where it is celebrated and where everyone can contribute and reach their full potential. Our supplier should also promote diversity at all levels of its workforce and leadership, including on boards.

10. Prevention of Abuse and Harassment

Our business partner must prevent dishonorable behavior, ill-treatment and harassment to create an atmosphere of equal respect for all employees.

11. Representation, Freedom of Association and Collective Bargaining

In order to protect and develop the social and economic rights and interests of the employees, the rights and freedoms of representation, association and collective bargaining should be respected without giving place to pressure, intimidation or harassment.

12. Freely Chosen Labor

Our suppliers shall avoid any forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise.

13. Employee Participation:

Our business partner must create and maintain an internal environment that incorporates employee participation in achieving the company's goals (e.g. communication of quality, safety, energy and environmental goals).

14. Working Hours and Overtime:

Working hours per day and week are not to exceed the maximum set by local law. The standard working hours of a week should not exceed 45 hours and the complete working hours of a week (including overtime) should not exceed 60 hours, except the consent of the employee. Employees shall be allowed at least 24 hours off per seven-day week.

II. Occupational Health And Safety

Legal requirements must be fulfilled, all kinds of protective and preventive measures must be taken to prevent incidents and accidents, and at the same time, employees must be provided with a well-equipped and hygienic working environment.

Potential emergencies and events shall be identified and evaluated and their impact minimized by implementing emergency plans, response procedures and exercises.

Production and other machinery shall be evaluated for safety hazards. Where machinery presents a danger of injury to workers, physical guards, interlocks and barriers must be provided and properly maintained. Employee safety shall be ensured by raising awareness on the use of PPE, and machinery safety, a healthy and ergonomic working environment shall be provided to employees by making risk assessments in a way that will reduce and eliminate the risk of work accidents and occupational diseases in the workplace.

Work premises must 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 shall be clearly marked, illuminated and not blocked. Evacuation drills and testing of fire alarms should be conducted regularly.

III. Environment And Energy

Our business partner must implement all legal and other obligations regarding the environment and energy.

Our supplier should work with external stakeholders to work for the reuse and recycling of waste, increase energy efficiency, minimize energy consumption, switch to the use of renewable energy to contribute to decarbonization, and implement a sustainable resource management focused on reducing water consumption.

Chemicals and other materials that pose a hazard if released into the environment should be identified and managed under a responsible chemical management system to ensure their safe handling, to control hazardous substances, transport, storage, use, recycling or reuse and disposal.

We take care to protect our suppliers' employees and external stakeholders from exposure to noise emissions and take the necessary precautions.

Delta Otomotiv expects its suppliers to protect animal welfare, air quality, water quality and soil quality, to use appropriate technology and methods in its processes and to ensure the continuity of this approach.

It should accept as a great responsibility the monitoring of greenhouse gas emissions by the suppliers and acting in harmony with the efforts to add value to the low carbon economy.

IV. Business Ethics

1. Preventing Bribery and Corruption

We expect all our suppliers to maintain the highest standards of integrity in their business interactions. Suppliers must take action against all threats of bribery, corruption, extortion, fraud, embezzlement and money laundering.

2. Conflicts Of Interest

All employees of the supplier must have an obligation to act honestly and ethically and in line with the interests of the company against conflicts of interest arising from financial, temporal, personal relationships and corporate opportunities, and must act in accordance with conflict of interest principles.

3. Data Protection and Data Security, Privacy

Suppliers must maintain reasonable expectations of privacy regarding the personal information of everyone with whom they do business, including their suppliers, customers, consumers and employees. Suppliers must operate in accordance with KVKK and comply with all legislation and requirements when collecting, storing, processing, transmitting and sharing personal information.

4. Safety, Quality and Technical Compliance

All products must meet contractual safety and quality criteria and be safely usable for their intended use. According to the contractual agreements made with the customer for product integrity, all technical regulations (laws, regulations and policies) applied to the products of Delta Automotive and its customers must be followed and applied, taking into account the basic logic of the relevant regulation.

5. Financial Integrity and Company Records

Financial and company reports should be recorded, stored and prepared for all stakeholders, taking into account financial responsibility, strictly adhering to laws and regulations and generally accepted accounting principles and control guidelines.

6. Protection against Whistleblowing and Retaliation

When someone inside or affiliated with an organization does something illegal, dishonest or dangerous, those who are first to know should be encouraged to report it. In addition, any form of retaliation against anyone who participates in or makes a complaint about a complaint regarding business ethics and conduct should be prohibited and not tolerated. A mechanism should be implemented to counter these behaviors.

7. Intellectual Property

Intellectual property rights must be respected by the supplier; technology and know-how transfer should be done in a way to protect intellectual property rights and customer information should be protected.

8. Disclosure of Information

Our business partner must disclose information regarding supplier workmanship, health and safety, environmental practices, business operations, structure, financial condition and performance in accordance with applicable regulations and applicable industry practices. Falsification of records in the supply chain or misrepresentation of conditions or practices is unacceptable.

9. Fake Parts

Suppliers are expected to develop, implement and maintain effective methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverables. In addition, suppliers will notify buyers of counterfeit product(s) and remove them from distribution when warranty is given.

10. Fair Competition and Antitrust

Suppliers must comply with applicable and applicable competition and antitrust laws. This includes entering into anti-competitive agreements with competitors, suppliers, customers or other third parties, avoiding commercial practices such as improper exchange of competitive information, price fixing, bid rigging or improper market allocation.

11. Export Control and Economic Sanctions

Suppliers must comply with all applicable and applicable laws when importing and exporting goods and services. Suppliers have a responsibility to ensure compliance with trade laws and regulations in all countries in which they do business.