## ASELSAN BUSINESS ETHICS AND CODE OF CONDUCT FOR SUPPLIERS

ASELSAN with its more than 10.000 employees and all its stakeholders, respects all dimensions of Human Rights and accepts articles of the United Nations Global Compact, European Convention on Human Rights, Universal Declaration of Human Rights, the OECD General Principles on Multinational Enterprises and the International Labor Organization (ILO) Declaration on Social Justice for Globalization.

This Policy is guided by the International Bill of Rights, the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work in 1998, the United Nations Global Compact, the United Nations Universal Principles of Human Rights, including the United Nations Guiding Principles on Business and Human Rights. It is guided by international human rights principles, including the Declaration. ASELSAN also supports the Organization for Economic Cooperation and Development (OECD) Guiding Principles for Multinational Enterprises and the ILO's Tripartite Declaration of Principles on Multinational Enterprises and Social Policy.

#### 1. LEGAL PRACTICES

## **Compliance with Legislation and Contracts**

Suppliers act in accordance with all applicable legislation and contractual provisions in their commercial activities.

## **Competition Law**

Suppliers do not engage in anti-competitive work or transactions. They work in full compliance with the provisions of the legislation regulating their fields of activity.

## **Bribery and Corruption**

Suppliers do not give, offer or accept bribes, payments or anything of value to institutions, organizations or individuals. Suppliers do not tolerate bribery and corruption in any way and behave consistently and responsibly in these matters.

# 2. WORKING CONDITIONS

## Discrimination

Suppliers; in all employment-related decisions such as recruitment, promotion, compensation, benefits, training, compulsory dismissal, termination; they cannot discriminate based on language, race, color, gender, disability, political opinion, philosophical belief, religion and sect or similar reasons.

## **Indemnity and Compensation**

The wage paid by the suppliers to their employees, overtime or all rights related to wages must be equal to or more than the amounts determined in accordance with the current Labor Law and other relevant legislation regulations.

# **Forced Labor**

Suppliers use only voluntary workforce and employ staff who want to work of their own free will. They do not use any threat or force, make false claims, or use force by any other form of coercion on its staff to work.

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# **Child and Young Workforce**

Suppliers should not employ people who have not completed their compulsory education and are under the age of 15, unless a higher age limit is specified in legislative regulations. However, suppliers cannot employ children and young workers under the age of eighteen at night in industrial jobs.

## **Working Hours**

Suppliers act in accordance with current legislation regulations on matters related to working order, especially working hours and overtime.

## **Fundamental Human Rights**

Suppliers respect each individual's dignity, privacy, freedom of expression and rights.

# **Freedom of Association and Collective Bargaining**

Suppliers recognize the rights of their employees to organize and collectively bargain in accordance with the law, and cannot discriminate and pressure their employees due to their participation in such legal organizations or trade unions.

# **Prevention of Fatigue**

Suppliers do not allow employees to violate their immunity in any way through physical, sexual, psychological or emotional harassment at the workplace or anywhere they are engaged, and they do not tolerate such events or behaviors that are contrary to the law and ethical rules. Suppliers do not ignore the harassment of the employee, do not take protective, encouraging, facilitating actions and practices for those who do them, and take measures to prevent psychological harassment from occurring.

#### 3. CODE OF ETHICS

### **Basic Principles**

- Suppliers carry out all their activities in line with the following basic principles:
- Reflecting the values of honesty and accuracy values to the business,
- To be humble, respectful and mutual understanding,
- To be consistent and clear in their actions and statements,
- Working with cost awareness (avoiding waste) and efficiency targets,
- Focused on meeting customer needs in the best way possible,
- Working in accordance with the mission and with the goal of reaching the vision,
- Avoiding behaviors that would damage the corporate identity and reputation,
- Complying with the relevant legislation regulations in their work,
- Continuous improvement of competencies and service quality,
- Adoption of corporate belonging and spirit,
- Encouraging creativity, different ideas, common sense, teamwork, flexible thinking and flexible behavior in the face of events,

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- Carrying out activities in a way that does not harm the environment,
- To comply with the regulations to protect occupational health and safety and to take the necessary precautions

## **Confidentiality and Protection of Trade Secrets**

Document, commercial or technical information received by the suppliers from ASELSAN is kept on the basis of confidentiality.

Suppliers accept all documents, designs, projects and information that are confidential about ASELSAN as company secrets and do not disclose them to third parties or make them available in any way, unless otherwise stated in the contracts.

Suppliers keep confidential all ideas, practices, inventions, designs, products or similar information and methods that are not yet known in the industry that provide competitive advantage, and do not share them with third parties without the written consent of ASELSAN and unless permitted by contracts.

#### **Conflict of Interest**

Suppliers avoid actions that create incompatibility, unfair competition or conflict of interest with ASELSAN, and do not use ASELSAN's assets such as information, documents, any kind of infrastructure support for their own benefit.

#### **Business Records**

Suppliers create, record and store all business-related information accurately, in full compliance with applicable legislative regulations. Be honest and straightforward in discussions with regulatory agency or agency representatives and government officials. In addition, they do not make any fraudulent or non-conformity in documents (quality, training, production, etc.) needed for the continuity of the company.

## **Relations with Third Parties**

Suppliers evaluate and select the organizations, dealers, business partners, suppliers and representatives with which they will make agreements, in a way that will provide the best service to its customers, by prioritizing the interests of ASELSAN and in accordance with the principles of transparency, impartiality and equality.

# **Receiving and Giving Gifts**

Except for commercial traditions and promotional materials, gifts and assets that give the impression of the existence of an irregularity, cause a dependency relationship or perceived as such are not sent or accepted by the supplier, with the exception of gifts such as items that do not exceed one fourth of the minimum wage, calendar agendas.

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#### **Entrusted Assets**

Suppliers protect the assets such as molds, hand tools, equipment, sub-materials etc. entrusted to them by ASELSAN for production or testing purposes in parallel with their needs and do not use for personal purposes or for the personal benefits of third parties, other than ASELSAN services.

# **Material Usage**

Suppliers never use counterfeit / copy material and faulty / defective materials and chemicals that have expired. All additional costs, losses or penalties arising from the use of these materials are compensated by the relevant suppliers.

## **Use of Social Media**

Suppliers are responsible for harassing, discriminating, defaming, defamatory, and harassing any person or group of racial, ethnic or national origin, gender or gender identity, sexual orientation, age, religion, disability and any legally protected status via social media. do not post false or threatening messages.

## **Supply Chain**

Suppliers comply with the principle of non-discrimination in the selection of the suppliers they will work with and the attitude towards suppliers, and make reasonable efforts to ensure that their suppliers comply with all these Code of Ethics.

### 4. OCCUPATIONAL HEALTH AND SAFETY

Suppliers comply with the legal regulations in the field of Occupational Health and Safety, and abide by the occupational health and safety responsibility of their employees and visitors. By implementing an effective occupational health and safety management system, they create safe and healthy working environments, control the dangers that their employees and visitors may be exposed to, and take the best possible precautions against accidents and diseases caused by the workplace. By providing training opportunities to their employees, they make sure that they are trained on occupational health and safety measures and that they implement the target practices and measures.

## 5. ENVIRONMENT

Suppliers are aware of their social responsibility to protect the environment and actively establish or use an environmental management system that complies with international standards. They follow the environmental legislation regularly and comply with the legislation. In order to minimize the pollution of the environment and protect the environment, they continuously develop and spread this awareness to all their employees.

### **BUSINESS ETHICS PRACTICE PRINCIPLES**

ASELSAN may inspect its suppliers' compliance with business ethics rules or assign a third party to carry out this control. ASELSAN reserves the right to terminate its relationship with its supplier without compensation in the event of a violation of all these rules.

ASELSAN may request the removal of the employee of any supplier who acts against the Supplier Code of Business Ethics and Code of Conduct and the law or contradicts these rules or may cease all cooperation with the relevant supplier.