

ZORLU HOLDING Supply Chain Principles

As Zorlu Group, among our principle responsibilities lies the conformity of our suppliers, who are our most important partners in all our companies, with internationally-recognised environmental, social and ethical standards. While choosing our suppliers, we seek conformity with Zorlu Holding Supply Chain Principles (Principles) which we have prepared in the light of all relevant national laws and regulations, notably the International Labour Organization (“ILO”) and United Nations (“UN”) agreements. We are committed to inform, to raise awareness and to provide training when necessary, in order to ensure our suppliers’ conformity with the Principles. Moreover, we expect from our suppliers to share, when deemed, necessary documents which show conformity with the Principles, within the framework of our auditing activities. Zorlu Holding Supply Chain Principles encompass all Zorlu Group Companies’ procurement operations and contain the rules of basic behaviour which are expected from all our suppliers. We expect our suppliers to communicate the Principles to their own supply chains and, in turn, the Principles to be applied by their own suppliers.

The prevention of Child Labour and Forced Labour

- Child workers must not be employed in any circumstances. Under the International Labour Organization Convention No. 138 the minimum age at which children can start work is 15, or 14 for some developing countries. Employees under the minimum age are termed child workers.
- The education of young employees older than the minimum age must not be obstructed and they must not be employed in dangerous work.
- Work must be voluntary. Workers must not be made to work by force or be obliged to do something.
- No employee must be made to work without security.
- The payment of debts through labour must not be accepted under any circumstances.

Prevention of Discrimination

- No tolerance must be shown for discrimination in the workplace, in recruitment, remuneration, education, promotion and retirement-related practices, or according to sex, age, religion, race, creed, social status, physical appearance, ethnic origin, nationality, political views, sexual orientation, pregnancy, union membership or any other reason.

Humane Treatment

- The exercise of physical exploitation or discipline in the workplace, sexual, verbal or physical abuse and intimidation are not acceptable in any way.
- In all work relations, behaviour must be fair and in line with basic moral and human values judgements. Remuneration
- Employees must be remunerated at least at the level of the minimum wage; all other benefits must be in accordance with laws, regulations and set conditions, and payments must be in an orderly and timely way.

Working Hours

- It must be ensured that employees have holidays and days of leave in line with laws and regulations and that working hours are in line with regulations.

Freedom of Association and Collective Bargaining

- It must be ensured that employees have the rights to join the labor unions which are set forth in local laws and seek representation & join workers' councils.

Occupational Health and Safety

- A healthy, hygienic and safe working environment must be provided to employees.
- Necessary measures must be taken to prevent workplace accidents and occupational diseases; employees must regularly be given Occupational Health and Safety training with the goal of creating awareness.

Environment

- All relevant laws, regulations and statues concerning the environment (including all laws concerning air emissions, effluent load, waste water and chemical substances) must be observed.
- Efforts must be made to reduce carbon emissions and the consumption of natural resources and to increase the amount of recyclable waste.

Ethics

- No gift must be given or received in order to facilitate business; bribes or corruption must not be allowed or tolerated in any way.
- Situations which would create a conflict of interest must be avoided.
- No action must be taken that are aimed at harming, obstructing or limiting competition.
- Business partners' intellectual property rights must be protected.

PRIVACY NOTICE ABOUT PROCESSING OF PERSONAL DATA BY ZORLU HOLDING

This Privacy Notice has been prepared in order to set forth the principles regarding the processing of your personal data which you have shared with Zorlu Holding is the data controller in accordance with the Law on the Protection of Personal Data numbered 6698 ("Law").

1. Processing Purpose

Your personal data is processed in accordance with articles 5 and 6 of the Law for the purposes of conducting the necessary operational activities for the provision of services provided by Zorlu Holding, carrying out necessary works with the relevant business unit and business partners for offering you personalized services that is appropriate for your consuming and purchasing motivations, ensuring the rights of real persons by receiving human resources management services

from Zorlu Holding, taking the necessary actions for Zorlu Holding to deliver, execute and realize commercial decisions, providing the legal security of Zorlu Holding arising from such relations.

2. Third Parties the Personal Data is Transferred to and Purposes of Transfer

Your personal data is transferred to Zorlu Holding, its group companies, business partners, suppliers, authorized public institutions and private persons in accordance with articles 8 and 9 of the Law for the purposes of conducting the necessary operational activities for the provision of services and products provided by Zorlu Holding, carrying out necessary works with the relevant business unit and business partners for offering you personalized products and services that is appropriate for your consuming and purchasing motivations, ensuring the rights of real persons by receiving human resources management services from Zorlu Holding, taking the necessary actions for Zorlu Holding to deliver, execute and realize commercial decisions, providing the legal security of Zorlu Holding arising from such relations.

3. Methods for Collection of Personal Data and Related Legal Reasons

Zorlu Holding collects your personal data through several channels and based on several legal reasons in order to use such personal data for the aforementioned purposes. Your personal data may be processed and transferred in accordance with the principles and purposes set forth in articles 5 and 6 of the Law.

4. Your Rights Under the Law

As per article 11 of the Law, as data subjects you are entitled to;

Learn whether or not your personal data are being processed,

- Request further information if your personal data have been processed,
- Learn the purpose of processing and whether or not data are being processed in compliance with such purpose,
- Learn the third party recipients to whom your data are disclosed within the country and abroad,
- Request rectification of processed personal data which is incomplete or inaccurate request notification of third parties to whom your personal data are disclosed, about such process,
- Request erasure or destruction of data in case the data is no longer necessary in relation to the purpose for which the personal data was collected, despite being processed in line with the Law or any other related law and request notification of third parties to whom your personal data are disclosed, about such process,
- Object to unfavorable results of analysis of processed personal data solely by automatic means,
- Demand compensation for damages suffered as a result of an unlawful processing operation.

You may communicate your requests regarding your rights to the kurumsaliletisim@zorlu.com address where Zorlu Holding is located in writing together with documents that will allow Zorlu Holding to confirm your identity via registered letter with return receipt. Zorlu Holding will evaluate and conclude your request at least within 30 (thirty) days as stated under the Law. The

aforementioned process is principally free of charge however, Zorlu Holding reserves the right to request for a fee based on the tariff determined by the Data Protection Authority.