



# Code of Conduct

Doc Nr : YES-TA-GT-001  
Release Date : 06.06.2024  
Revision Nr : 000  
Revision Date:  
Page : 1/3

Yespan regulates business relations with the rules of conduct contained in this document. While it will adhere to these ethical rules itself, it expects both its suppliers and employees to adhere to these ethical rules.

The main reason for clearly determining the rules of conduct is that Yespan acts with a sense of responsibility and wants to develop sustainable relationships with both its suppliers and customers in the future.

Therefore, Yespan will not tolerate any illegal or inappropriate behaviors.

## Legal Compliance

### Comply with the laws and regulations of the applicable legal systems.

- Human Rights and Labor Practices
- To ensure respect of all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations, increased attention shall be paid to ensuring respect of human rights of specifically vulnerable rights holders or groups of rights holders such as women, children or migrant workers, or of communities.

### Prohibition of Forced Labor

- Neither use nor contribute to slavery, servitude, forced or compulsory labor and human trafficking.

### Prohibition of Child Labor

- Not employing child workers in accordance with the procedures and principles specified in the Labor Law No 4857.

### Non-Discrimination and Respect for Employees

- To ensure equality of opportunity and treatment among employees, regardless of skin color, race, nationality, ethnicity, political affiliation, social background, disability, gender, sexual identity and orientation, marital status, religious belief or age.
- Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### Working Hours, Wages and Benefits of Employees

- Comply globally with all applicable regulations regarding working hours.
- Pay fair wages and comply globally with all applicable laws regarding wages and compensation.



## Health & Safety of Employees

- ›› Act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.
- ›› Provide training to ensure employees are educated in health & safety issues.
- ›› Establish a reasonable occupational health & safety management system.

## Grievance Mechanism

- ›› Provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct.

## Environmental Protection

- ›› Act in accordance with the applicable statutory and international standards regarding the environment. Minimize environmental pollution and make continuous improvements in environmental protection.
- ›› Establish a reasonable environmental management system.

## Fair Operating Practices

### Anti-Corruption and Bribery

- ›› Tolerate no form of and do not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments.

### Fair Competition, Anti-Trust Laws and Intellectual Property Rights

- ›› Act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
- ›› Respect the intellectual property rights of others.

### Conflicts of Interest

- ›› Avoid and/or disclose internally and to YESPAN ELEKTRİK SANAYİ TİCARET LİMİTED ŞİRKETİ all conflicts of interest that may influence business relationships, and to avoid already the appearance thereof.

### Anti-Money Laundering, Terrorism Financing

- ›› Not directly or indirectly facilitate money laundering or terrorism financing.



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Doc Nr : YES-TA-GT-001  
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Page : 3/3

## Data Privacy

- Process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.

## Export Control and Customs

- Complying with export control and customs regulations.

## Responsible Minerals Sourcing

Take reasonable efforts to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

## Supply Chain

- Use reasonable efforts to make its suppliers comply with the principles of this Code of Conduct. Complying with 10th article of the Turkish Constitution (principles of non-discrimination) in supplier selection and treatment of suppliers.

Place, Date

Signature

Name, Company Name, Company Seal

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