



Supplier Responsibility

Nuhgroup



Nuh Grup Yönetim Bilişim Hizmetleri ve Danışmanlık San. Tic. A.Ş Family of Companies (NUHGROUP) holds itself to high standards and these along with our management philosophy are embodied in Our Credo. These Standards reflect our internal values and the expectations of external stakeholders, such as customers, regulators, investors and the public. Furthermore, we find business relationships are more productive and effective when they are built on trust, mutual respect and common values. As such, NUHGROUP seeks relationships with suppliers who share a common commitment to:

- Comply with applicable laws and regulations
- Behave ethically and with integrity
- Integrate quality into business processes
- Respect human and employment rights
- Promote the safety, health and well-being of employees
- Embrace sustainability and operate in an environmentally responsible manner
- Implement management systems to maintain business continuity, performance governance, and continuous improvement
- Disclose information associated with the supplier's impact on the environment and social issues.



We believe when these guiding principles are followed, businesses and communities realize economic, social and environmental benefits. We developed the following Standards to assist us with selecting suppliers who operate in a manner consistent with these guiding principles and to assist our suppliers with understanding our expectations. Suppliers are expected to understand expectations of Nuhgroup companies and manage to them. In addition to these Standards being part of purchasing contracts, NUHGROUP may take steps to assess a supplier's conformance to these Standards. When appropriate, a Nuhgroup company works with its suppliers to identify agreed upon actions and schedules in order to achieve improvement. NUHGROUP companies consider progress in meeting these Standards and ongoing performance in their sourcing decisions.

Legal Compliance

- NUHGROUP's suppliers are expected to operate in compliance with all applicable laws and regulations of the countries, states and localities in which they operate. This includes but is not limited to business conduct, product quality, labor and employment practices, health and safety and environmental protection. They are expected to conform their practices to any published standards for their industry, obtain all applicable permits and to operate in accordance with permit limitations and requirements at all times.

Ethics and Business Conduct

NUHGROUP's suppliers are expected to behave ethically and with integrity in all business transactions. As such, they shall:

- Uphold standards for fair business practices including accurate and truthful advertising, fair competition, and antitrust.
- Prohibit payment of bribes, illegal political contributions, or other illicit payments or methods for any reason, including the waiver of penalties or fines or the receipt of any other special benefits.
- Safeguard against improper use of intellectual property, including disclosure of confidential or sensitive information, pricing, employee information or patient information.
- Maintain an environment of transparency, collaboration and innovation.
- Treat any animals used in its activities in an ethical and humane manner and follow the principles of replacement, refinement, and reduction of laboratory research animal testing.



Quality

- NUHGROUP's suppliers are expected to meet agreed upon product specifications and quality requirements in order to provide goods and services that consistently meet customers' needs, perform as intended and are safe for their intended use. These product specifications and quality requirements shall be defined in a supply agreement and a quality agreement as agreed to by a NUHGROUP company and its external supplier.

Human Rights, Labor and Employment

NUHGROUP's suppliers are expected to treat people with dignity and respect. As such, they shall:

- Not use forced, bonded, indentured or involuntary prison labor.
- Not discriminate against or harass an individual on the basis of race, color, religion, gender, pregnancy, HIV status, health status, sexual orientation, national origin, age, disability, veteran's status, marital status, or political affiliation.
- Not treat or threaten to treat an individual harshly or inhumanely. Harsh or inhumane treatment includes sexual harassment or abuse, corporal punishment, coercion or verbal abuse
- Avoid unsafe working conditions by providing sufficient rest periods during the workday and honor agreed upon days off from work and maximum working hours.

Human Rights, Labor and Employment

- Pay wages for worked and clearly communicate the wages that employees are to be paid to them in advance of commencing work. Communicate to all employees if overtime is required and the wages to be paid for such overtime.
- Comply with NUHGROUP's Employment of Young Persons Policy and not employ anyone under the age of 16 and not employ anyone under the age of 18 to perform hazardous work.
- Respect workers' rights to make informed decisions free of coercion, threat of reprisal or unlawful interference regarding their desire to join or not join organizations.
- Respect worker's rights to bargain collectively without unlawful interference.
- Implement policies and/or procedures to evaluate and address risks of human trafficking (as defined by the United Nations and generally thought of as the recruitment, transportation, transfer, harboring or receipt of persons by threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or giving payments or benefits to a person in control of the victim).

Health, Safety and Well-being of Employees

NUHGROUP's suppliers are expected to maintain the workplace and any living quarters used to house employees in a clean, orderly and safe manner. As such they shall:

- Implement programs to prevent or control employee exposures to workplace hazards including chemical, biological, and physical hazards.
- Implement programs to manage processes safely and prevent catastrophic events.
- Identify and encourage programs that promote access to health programs that positively impact the health of employees
- Identify potential emergency situations, implement preventative measures and be prepared to execute emergency response procedures.
- Provide occupational health and safety training.

Sustainability and Environmental Responsibility

NUHGROUP's suppliers are expected to operate in a sustainable and responsible manner. As such, they shall:

- Work to reduce the environmental impacts of their operations including natural resource consumption, materials sourcing, waste generation, wastewater discharges and air emissions.
- Prevent accidental releases of hazardous materials into the environment and adverse environmental impacts on the local community.
- Implement programs to ensure products do not contain restricted or banned materials.
- Implement programs that recognize, respect and invest in the local community.

Management Systems

NUHGROUP's suppliers are expected to manage their activities systematically in order to maintain business continuity, meet the Standards set forth in this document and to improve their operations continually. As such, they shall:

- Demonstrate top management commitment and accountability through policies, objectives, and formal processes.
- Implement processes to control documents and records.
- Provide resources, including competent personnel and appropriate infrastructure, to ensure conformance to these Standards.
- Implement processes to control the production of NUHGROUP products and/or materials, manage change effectively and ensure customer requirements are satisfied.
- Implement processes to manage nonconformity, incident response and emergency situations related to products, business operations/continuity and these Standards, including the reporting of certain events to applicable regulatory authorities and NUHGROUP as appropriate.
- Identify and implement improvement actions, including effective complaint investigation, internal audit and corrective action processes.

Transparency and Disclosure

NUHGROUP's suppliers are expected to make reasonable efforts to disclose (for example on a website or a publicly available report) topics and goals that are important to the organization's impact on the environment and social issues. Among the issues that we encourage our suppliers to review and be transparent about are:

- Energy, Waste and Water Use/Reductions.
- Employee Health, Safety and Wellness Programs.
- Community and Human Rights Investments

Monitoring and Compliance

Suppliers shall review their operations to ensure their compliance to all applicable legal requirements and their conformance to these Standards and/or comparable industry approved standards. If a regulatory agency, auditor, a NUHGROUP company or a supplier identifies areas of non-compliance, the supplier is expected to develop, document and implement plans to remedy any such non-compliance.

NUHGROUP may engage in monitoring activities to confirm a supplier's compliance to these Standards, including on-site assessments of facilities, use of questionnaires, review of available information or other measures necessary to review supplier's performance.

NUHGROUP reserves the right to disqualify any potential supplier or terminate any relationship with a current supplier that has failed to conform to these Standards.