

CODE OF CONDUCT

PREAMBLE

SPO is committed to ethical, lawful and socially responsible corporate governance. We also expect this behaviour from all those with whom we maintain business relationships. For future co-operation, the contractual partners agree to apply the following regulations for a common code of conduct. This agreement is the basis for all future deliveries. The contracting parties undertake to fulfil the principles and requirements of the code of conduct and to endeavour to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. This agreement comes into force upon signing. Any breach of this code of conduct may be grounds for SPO to terminate the business relationship, including all associated supply contracts.

This code of conduct is based on national laws and regulations as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact.

Karani Güleç
General Manager

1. SOCIAL RESPONSIBILITY

1.1. Prohibition of forced labour

There must be no use of forced labour, slave labour or similar work. All labour must be voluntary and employees must be able to leave work or the employment relationship at any time. Furthermore, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

1.2. Prohibition of child labour

Child labour must not be used at any stage of production. The supplier is requested to comply with the recommendation contained in the ILO conventions on the minimum age for the employment of child labour. Accordingly, the age should not be less than the age at which compulsory schooling ends and in any case not less than 15 years. In case children are found at work, the supplier shall document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers must be protected and special protective regulations must be observed.

1.3. Fair remuneration

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. The remuneration for overtime must in any case exceed the remuneration for regular hours. If the remuneration is not sufficient to cover the costs of normal living expenses and to build up a minimum level of reserves, the supplier is obliged to increase the remuneration accordingly. Employees shall be granted all legally prescribed benefits. Deductions from wages as punitive measures are not permitted. The supplier must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

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1.4. Fair working hours

Working hours must comply with the applicable laws or industry standards.

1.5. Freedom of association

The right of employees to form and join organisations of their choice and to engage in collective bargaining must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be granted. Employee representatives must be protected from discrimination. They must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

1.6. Prohibition of discrimination

Discrimination against employees in any form is not permitted. This applies in particular to discrimination on the basis of gender, race, caste, skin colour, disability, political conviction, origin, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual must be respected.

1.7. Occupational health and safety

The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. In addition, employees must be regularly informed and trained on applicable health and safety standards and measures. Employees must have access to sufficient drinking water and clean sanitary facilities.

1.8. Complaints mechanisms

The Supplier is responsible for establishing an effective grievance mechanism within the facility for individuals and communities that may be affected by adverse impacts.

2. ECOLOGICAL RESPONSIBILITY

2.1. Treatment and discharge of industrial wastewater

Wastewater from operational procedures, production processes and sanitary facilities must be characterized, monitored, checked and, if necessary, treated prior to discharge or disposal. In addition, measures must be taken to reduce the amount of wastewater produced.

2.2. Dealing with air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be characterized, routinely monitored, checked and, if necessary, treated before they are released. The supplier is also responsible for monitoring its emission control systems and is encouraged to find cost-effective solutions to minimize emissions.

2.3. Handling waste and hazardous substances

The supplier shall follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a risk if released into the environment shall be identified and handled in a manner that ensures safety during handling, transport, storage, use, recycling or reuse and disposal.

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2.4. Reducing the use of raw materials and natural resources

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by economizing, by recycling or by reusing materials.

2.5. Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Economic solutions must be found to improve energy efficiency and minimize energy consumption.

3. ETHICAL BUSINESS BEHAVIOUR

3.1. Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their own prices and other resale conditions.

3.2. Confidentiality/data protection

The supplier undertakes to fulfil the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The Supplier shall comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transferring and disclosing personal information.

3.3. Intellectual property

Intellectual property rights must be respected; technology and know-how must be transferred in such a way that intellectual property rights and customer information are protected.

3.4. Integrity/bribery, taking advantage

The highest standards of integrity must be applied in all business activities. The supplier must have a zero-tolerance policy towards all forms of bribery, corruption, blackmail and embezzlement. Procedures for monitoring and enforcing standards shall be applied to ensure compliance with anti-corruption laws.

With regard to supply chains, we expect our suppliers to identify risks within these and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform SPO promptly and, if necessary, regularly about the violations and risks identified and the measures taken. SPO checks compliance with the standards and regulations listed in this document using a self-assessment questionnaire and sustainability audits at the supplier's production sites. The supplier agrees that SPO may carry out such audits to verify compliance with the code of conduct at the supplier's production sites during normal business hours after reasonable advance notice by persons authorized by SPO. The Supplier may object to individual audit measures if these would violate mandatory data protection regulations. If a breach of the provisions of this code of conduct is identified, SPO shall notify the Supplier of this in writing within one month and set it a reasonable grace period to bring its behaviour into line with these provisions. If such a breach is culpable and makes it unreasonable for SPO to continue the contract until its ordinary termination, SPO may terminate the

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contract after the fruitless expiry of the grace period set if it has threatened to do so when setting the grace period. A statutory right to extraordinary termination without setting a grace period remains unaffected, as does the right to compensation.

By signing this document, the supplier undertakes to act responsibly and to comply with the principles/requirements listed. The supplier undertakes to communicate the content of this code of conduct to employees, authorized representatives and subcontractors in a manner that is comprehensible to them and to take all necessary precautions for the implementation of the requirements.

Place/Date

Name

The Company

Signature