

BATI ANADOLU GROUP OF COMPANIES SUSTAINABLE PROCUREMENT AND RESPONSIBLE PURCHASING POLICY

1. Purpose and Scope

This Sustainable Procurement and Responsible Purchasing Policy (“Policy”) is based on the basic principles and policies of Batıçim Batı Anadolu Çimento Sanayii A.Ş. and its subsidiaries over which it has direct and indirect control (“**Batı Anadolu Group of Companies**”) in the fields of business ethics, sustainability, quality, occupational health and safety, environment and energy. Believing that a sustainable purchasing approach can be established through a responsible supply chain adopted by our suppliers, we conduct our supplier relations within the framework of this policy.

While realizing its sustainable growth strategy, Batı Anadolu Group of Companies aims to cooperate with its suppliers in the supply chain on sustainability management and its components, to increase sustainability awareness, to create a positive social impact and to support its activities with exemplary environmentally friendly approaches.

The purposes of this Policy is;

- To ensure that all operations in the supply chain are carried out in accordance with the law and ethical rules,
- To establish honest, respectful, fair, impartial and transparent business relations with all suppliers without discrimination,
- To set an example for all parties in the supply chain in terms of sustainability and corporate social responsibility awareness; and
- To create a sustainable supply chain culture for the environment and society by collaborating with suppliers to ensure continuous improvement and encouraging suppliers to share feedback and best practices.

Batı Anadolu Group of Companies considers human rights, equality, diversity and inclusion as an important element in business life and prioritizes the development and promotion of such practices.

The main reference source of this Policy is the policies and principles of international organizations, national and international legal legislation covering human rights. In this context; Batı Anadolu Group of Companies observes and applies the following human rights legislation in its activities.

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- United Nations Universal Declaration of Human Rights
- United Nations Global Compact
- International Labor Organization Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- Other relevant national and international legislation.

In accordance with this Policy, Batı Anadolu Group of Companies aims to inform its suppliers about its sustainability strategy and expectations and to contribute to reducing sustainability risks by adding the aforementioned criteria to supplier performance evaluation processes.

This Policy covers the Batı Anadolu Group of Companies, suppliers and all institutions and organizations with which the company has a business relationship.

2. Responsibilities

The Chief Financial Officer is responsible for the implementation of this Policy at the highest level, and the Purchasing Department is responsible for the implementation of the Policy, the development, monitoring and reporting of its dissemination throughout the company.

Suppliers and business partners are responsible for establishing and conducting all business processes in accordance with the commitments, principles and principles set forth in this Policy. Suppliers and business partners may provide the necessary communication with Batı Anadolu Group of Companies officials in case of need for additional information, implementation and collaboration regarding the Policy.

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3. GENERAL PRINCIPLES

3.1. Code of Ethics and Working Principles

The guiding guide that includes the values and working principles that Batı Anadolu Group Companies take as basis in their relations with employees and all persons in the supply chain in all business processes is the Code of Business Ethics and Working Principles of Batı Anadolu Group of Companies (“Code of Business Ethics and Working Principles”).

The purpose and scope of this Code of Business Ethics and Working Principles is to determine the ethical standards, rules of conduct and business principles for Batı Anadolu Çimento Sanayii A.Ş. and all third parties and employees acting on behalf of Batı Anadolu Group of Companies. The purpose of this Code of Business Ethics and Working Principles is to establish expectations, standards and ethical practices that form the basis of all business relations and transactions, to prevent any disputes and conflicts of interest that may arise, to strengthen the culture of the Batı Anadolu Group of Companies, to ensure reliability and to provide guidance to achieve sustainable success.

3.2. Occupational Health and Safety / Environmental Regulations / Protection of Information

One of the main objectives of Batı Anadolu Group of Companies is to work with suppliers that continuously improve their processes with preventive and corrective approaches to occupational health and safety, make occupational health and safety an integral part of the company culture, comply with all legal regulations and standards in this regard, and strive to do better than the requirements of the legislation.

Batı Anadolu Group Companies act in accordance with its social responsibility to protect the environment. Batı Anadolu Group of Companies expects its suppliers to establish environmental management systems, commit to continuous improvement and environmental protection in order to increase their environmental performance in line with the principles of sustainable development and circular economy in accordance with the relevant national and international legal regulations and regulations.

While operating in line with the principles of prioritizing the sustainability approach and combating the climate crisis, Batı Anadolu Group of Companies expects its suppliers to take the Management

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Systems Policy of Batı Anadolu Group of Companies as a reference and to be a partner in this commitment.

Batı Anadolu Group of Companies Companies store confidential information obtained in any way in the supply and procurement chain with protection in accordance with the policies of Batı Anadolu Group of Companies and the laws of the countries in which it does business. Suppliers also comply with all policies aimed at protecting confidentiality without compromise and undertake not to share confidential information with third parties.

Suppliers must create, record and store all business-related information accurately and in full compliance with applicable legal and regulatory requirements. At the same time, suppliers may process the personal information of their employees, business partners and customers in order to improve company processes and activities to the extent permitted by the legislation. The aforementioned personal data shall not be shared with third parties without the consent of the persons concerned.

3.3. Human Rights

Batı Anadolu Group of Companies Human Rights Policy (“Human Rights Policy”) is the guiding guide that includes the values and working principles that Batı Anadolu Group of Companies is based on in its relations with employees and all persons in the supply chain in all business processes.

The purpose of the Human Rights Policy of Batı Anadolu Group of Companies is to emphasize the importance it attaches to approaches and standards based on human rights in parallel with its economic, environmental and social sustainability approach for its employees, business and solution partners, suppliers and contractors during the activities carried out by Batı Anadolu Group of Companies.

Suppliers act in accordance with the labor legislation in force in the country where they are located regarding working hours and leave rights. Suppliers shall act in accordance with the labor legislation in force in the country in which they do business regarding the wages, overtime and wage-related rights paid to their employees.

Suppliers protect and respect the human rights, dignity and privacy of the communities they impact through their business activities.

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3.4. Combating Bribery and Corruption

Bati Anadolu Group of Companies' Anti-Bribery and Anti-Corruption Policy (“Anti-Bribery and Anti-Corruption Policy”) is the guiding guide that includes the values and working principles that Bati Anadolu Group of Companies takes as basis in its relations with employees and all persons in the supply chain in all business processes.

The main purpose of the Anti-Bribery and Anti-Corruption Policy is to ensure that Bati Anadolu Group of Companies is in full compliance with ethical values and legal regulations, to protect business ethics standards, to establish a framework to prevent bribery and corruption and to inform employees on the aforementioned issue.

The Anti-Bribery and Anti-Corruption Policy aims to maintain healthy and fair business relations with employees, business and solution partners, create a transparent business culture, and protect and strengthen the reputation of Bati Anadolu Group of Companies.

Suppliers undertake not to engage in any improper behavior, such as giving or receiving bribes for business or financial gain. No supplier employee may offer, give or accept any gift or payment that could be perceived as a bribe. Corruption, embezzlement, facilitating payments of any kind or bribery, regardless of the type or manner in which it is carried out, has no place in the way suppliers conduct business.

All suppliers' accounting records and supporting documentation should accurately and clearly reflect the relevant expenditures.

Within the scope of the existing contractual relationship with Bati Anadolu Group of Companies, suppliers are obliged to comply with all applicable legislation (processing and protection of personal data, anti-corruption, competition, environment, occupational health and safety, intellectual and property rights, etc.) and the contractual arrangements established between them and Bati Anadolu Group of Companies.

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3.5. Diversity, Equality and Inclusion

The guiding guide that includes the values and working principles that Batı Anadolu Group Companies take as basis in their relations with employees and all persons in the supply chain in all business processes is the Diversity, Equality and Inclusion Policy of Batı Anadolu Group of Companies (“Diversity, Equality and Inclusion Policy”).

The purpose of the Diversity, Equality and Inclusion Policy is to create a guide that reflects the approaches and standards of Batı Anadolu Çimento Sanayii A.Ş. and the activities carried out by Batı Anadolu Group of Companies on diversity, equality and inclusion, and in this way to emphasize the importance that Batı Anadolu Group of Companies attaches to this issue.

4. Principles of Implementation

In the audits conducted for the suppliers of Batı Anadolu Group of Companies, the compliance of the suppliers with the rules in this Policy is questioned and corrective and preventive actions are taken for nonconformities. Suppliers are expected to improve the aforementioned processes and the improvements made are checked through follow-up audits.

Batı Anadolu Group of Companies may request the suspension of any employee of any supplier who acts in violation of the applicable legal legislation or in a manner contrary to these rules or may terminate the contract with the relevant supplier.

Batı Anadolu Group of Companies undertakes to treat all notifications confidentially and to protect the notifiers.

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5. Policy Violations

Batı Anadolu Group of Companies encourages its business partners and suppliers to report non-compliance with this Policy and expects them to prepare reports.

People who want to report suspicious behavior contrary to this Policy or violations of the rules in this Policy can use the following communication channels.

E-Mail : etik@batianadolu.com

Address : Ankara Caddesi No: 335- Bornova/İZMİR

Attention to Human Resources Directorate

Batıçim Batı Anadolu Çimento Sanayi A.Ş.

Batı Anadolu Group of Companies will maintain confidentiality about the person who has reported the supplier's suspicious behavior or a possible violation of business ethics contrary to this Policy and will not tolerate any inappropriate behavior such as retaliation etc. that may be applied against this person.

6. Ratification and Review

This Policy is ensured to comply with changing legal regulations.

In the event that this Policy is revised by Batı Anadolu Group of Companies, Suppliers undertake to accept the revised Policy and to comply with all of the principles specified by adopting the revised Policy.

This Policy enters into force with the decision of Batıçim Batı Anadolu Çimento Sanayii A.Ş. executive board.

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7. Related Documents

- Batı Anadolu Group of Companies Code of Business Ethics and Working Principles (BTA-IKB-YO-007)
- Batı Anadolu Group of Companies Management Systems Policy (BTA-BYS-PO-001)
- Batı Anadolu Group of Companies Human Rights Policy (BTA-IKB-PO-001)
- Batı Anadolu Group of Companies Anti-Bribery and Anti-Corruption Policy (BTA-IKB-PO-002)
- Batı Anadolu Group of Companies Diversity, Equality and Inclusion Policy (BTA-IKB-PO-003)
- Batı Anadolu Group of Companies Sustainability Policy (BTA-SUR-PO-001)

"This policy applies to all Batı Anadolu Group of Companies."

The companies within Batı Anadolu Group of Companies are as follows:

- Batıçim Batı Anadolu Çimento Sanayii A.Ş.
- Batisöke Söke Çimento Sanayii T. A.Ş.
- Batıbeton Sanayi A.Ş.
- Batılıman Liman İşletmeleri A.Ş.
- Ash Plus Yapı Malzemeleri Sanayi ve Ticaret A.Ş.
- Batıçim Enerji Elektrik Üretim A.Ş.
- Batıçim Enerji Toptan Satış A.Ş.

GÜLANT CANDAŞ

Deputy Chairman of the Board of Directors

Executive Director