

NUROL ENTERPRISES GROUP

PROCUREMENT GUIDELINES

As Nurol Holding Inc. and Enterprises Group, it is our top priority that the suppliers are in conformity with internationally accepted legal, social, ethical and environmental standards and guidelines. In this context, we wish to choose our suppliers, who are our business partners and our biggest supporters, from those persons and institutions who share the values of Nurol Enterprises Group and adopts the same level of ethical standards, and wish to form a lasting and sustainable relationship with our Suppliers.

Nurol Enterprises Group Procurement Guidelines (“Procurement Guidelines”) includes general principles that apply to each and every one of the Suppliers, and the agreements executed with Suppliers may include specific and more detailed terms on the same subject matters. None of the terms in the Procurement Guidelines will be removed by any specific terms on the same subject matter in any written agreements.

As Nurol Enterprises Group, we request that our Suppliers communicate and make available the Procurement Guidelines to those relevant persons who work at their organizations and ensure that their employees act in accordance with the principles that are described in the Procurement Guidelines.

- A- Anti-Corruption and Bribery:** Nurol Enterprises Group acts with integrity and according to the regulations and ethical values of each country that it operates in. It is strictly forbidden for the Group and its employees to be involved in bribery, corruption, abuse or money laundering, and a zero-tolerance policy is applied concerning these. Accordingly, the Suppliers must also not be involved in any action regarding bribery, corruption, abuse or money laundering, and they must also comply with any applicable anti-bribery laws and rules and international regulations.
- B- Competition:** Nurol Enterprises Group attaches great importance to competing with its competitors under free and fair competition conditions and guarding consumers’ well-being while conducting its operations. Therefore, it is strictly forbidden for the Suppliers to abuse their dominant positions in the markets that they are present, to proceed with actions against others or harmoniously with others that will negatively affect the competition such as price fixing and market sharing, or to be in agreements that restrict the competition.
- C- International Commercial Regulations:** The Suppliers must act in compliance with all the applicable trade, export and import regulations. The regulation of international trade is organized accordingly with the national security interests and foreign policies of the states which implement control mechanisms for import and export, and Nurol Enterprises Group respects these states’ international trade regulations. These regulations apply to products, services, software, data import and export as well as sanction and anti-boycott laws.
- D- Protection of the Personal Data:** Nurol Enterprises Group respects the right of privacy. Suppliers shall process and store the data according to the laws of personal data and ensure that necessary security measures are taken for the personal data which are shared by Nurol Enterprises Group with regard to the business relations. The suppliers are obliged to accept and commit to the specific contractual provisions which will be included in the agreements with the Group to guarantee the protection of the personal data.
- E- Confidential Information:** Nurol Enterprises Group expects its Suppliers to respect all information provided by Nurol Enterprises Group including intellectual property rights, trade secrets, sensitive and confidential information, and in case they have access to such information, the Group expects them to take the necessary security measures in order to protect such information. These information shall not be used or disclosed by the Suppliers

without the prior written approval of the Group, except for those cases that are indicated in the agreements with the Group or those situations where the information are made public without the breach of agreements by any party. The Suppliers shall not disclose the confidential information of Nurol Enterprises Group to any persons outside of their own organizations and shall disclose such information within their organization to those with a need to know to carry out the work. It is strictly forbidden for the Supplier to use Nurol Enterprises Group's confidential information for its own interests or the interests of those persons and institutions outside of the Group.

- F- Transparency and Conflicts of Interest:** Nurol Enterprises Group understands that forming and maintaining transparent and honest relationships with Suppliers is vital for the sustainability of the relationships, and in this regard, greatly commits to equal and fair evaluation of its Suppliers within the framework of objective rules. Therefore, none of the Group employees shall act against the provision of maintaining the best interest of the Group or form economic or other relationships with the Suppliers that will cause a conflict of interest. It is strictly forbidden for the Suppliers and/or their employees to use their personal relationships with the Group employees to pressure the Group employees and to affect their commercial decisions regarding the business. If the Suppliers have any family ties (such as spouses, parents, siblings, grandparents, children, grandchildren, in-laws) with the Group employees that they work with, then they should immediately disclose such information to the Group or ensure that the relevant Group employee discloses such information.
- G- Prevention of Forced Labor and Child Labor:** Any and all employment practices that contradict with the human rights, including but not limited to forced labor, labor on debt, abuse, physical punishment, are absolutely unacceptable to Nurol Enterprises Group. The Group will not work with any Supplier that have such employment practices. Employing persons that are under the minimum employment age in the country that the business is conducted and, in all cases, employing children under the age of 15 is prohibited.
- H- Anti-discrimination and Humane Treatment:** Providing equal opportunities to the employees at all levels and treating the employees in a fair and non-discriminatory way is required regardless of their race, nationality, gender, sexual orientation, social and personal status, physical condition, marital status, religion, personal belief, disability and age.
- I- Work Conditions:** Nurol Enterprises Group is committed to providing all of its employees a fair, safe, productive and inclusive working environment and to act according to the universal human rights. The Group thinks that providing such working environment to its employees is one of the main drivers of the success of the Group and asks its Suppliers to share this commitment to build a successful supply chain. Accordingly, the relevant regulations are required to comply with regarding paying the employees wages they deserve and the pricing of mandatory work and overtime hours. Additionally, providing vacation days and off days to the employees according to the regulations and work hours in compliance with the regulations are also the requirements expected from the Suppliers.
- J- Right to Organize:** The legal rights of all employees in relation to organization and collective bargaining within the regulations shall be respected, and the relationships between the labor unions or other representatives organized in compliance with the regulations and the Suppliers shall be conducted in a constructive manner.
- K- Occupational Health and Safety:** Our Suppliers are required to provide a healthy and safe work environment for their employees and to deliver occupational health and safety trainings to their employees in regular intervals to create awareness. Additionally, all those Suppliers who provide services at the facilities belonging to Nurol Enterprises Group are required to follow the occupational health and safety rules that are adopted and applied by the Group.
- L- Training and Development:** Nurol Enterprises Group values the development of employees' skills and competencies. Accordingly, the Suppliers shall provide appropriate training and tools for their employees to help them develop their skills and competencies.

- M- Employee Personal Rights:** Respecting the personal rights of the employees is one of the core principles of Nurol Enterprises Group. When terminating a business relationship between the Supplier and employee, the Supplier is expected to act as a responsible employer in order to reduce the effects of the termination to the employees within the regulations in force. It is required to gather information from each of the affected employees in compliance with the regulations and that employees are able to exercise their personal rights.
- N- Conservation of the Environment:** Nurol Enterprises Group highly values the conservation of our environment and strives to minimize the effects of the production processes and the products on the environment. The Group expects its Suppliers to help realize this commitment. In this framework, the Suppliers (i) shall make the effort to best use the resources and reduce the pollution to minimum; (ii) shall design their products considering their effects on the environment and their potential re-use or recycling; (iii) shall best manage the treatment and disposal of the wastes in compliance with the regulations in force; (iv) shall avoid using the hazardous and potentially hazardous materials that are defined in the regulations; (v) shall take the environmental effects of the logistics management into consideration; and (vi) shall work towards an economy that does not consume carbon based fuels, knowing that the global climate change is an existential threat.
- O- Presents:** The Suppliers are strictly prohibited from providing elements such as cash, presents, payments, food or entertainment that will affect the decisions of the Group employees regarding the business or come across as such. Our Suppliers are expected to comply with this regard and to avoid giving presents or providing a similar benefit to the Group employees.
- P- Keeping the Books and Records Accurately:** Keeping the books and records accurately, completely and honestly is essential to preserve the reputation and trustworthiness of Nurol Enterprises Group as well as the Group's ability to perform its obligations under the regulations. The books and records (including but not limited to the reports, presentations, financial statements and footnotes) that are to be presented to the public and authorities by the Group shall be prepared accurately, completely and with transparency. The Group expects its Suppliers to keep their books and records by adhering to the same principles.
- Q- Audit:** Nurol Enterprises Group demands all of its Suppliers to act accordingly with these Procurement Guidelines. The Group holds the right to periodically request information and documents from its Suppliers, conduct on site audits at any time or conduct audits with third parties to confirm whether the Procurement Guidelines are followed or not. By working with Nurol Enterprises Group the Suppliers accept that the Group has the rights to the abovementioned demands and audits.
- R- Responsibility:** Terms and statements included in the Procurement Guidelines are not prepared with an aim towards providing any contractual rights to the Suppliers to be claimed against Nurol Enterprises Group, and the Suppliers can not claim any rights based on the Procurement Guidelines. Acting in accordance with the Procurement Guidelines is in entirely the Supplier's responsibility. The Suppliers accept that the Group has the right to make changes from time to time and unilaterally on the Procurement Guidelines and the Procurement Guidelines can be accessed via our website.