

Supply Chain Code of Conduct

Limak Çimento upholds respect for Human Rights. This commitment shapes our relationships with the communities in which we operate and with all of our business partners across our supply chain. Limak Çimento also respects the environment and, in this regard, is committed to managing, reducing, and reporting the environmental impacts of both our organization and our supply chain. These principles are clearly and transparently set out in the Limak Çimento Code of Conduct.

All of our employees, suppliers, and their subcontractors undertake to comply with the United Nations Universal Declaration of Human Rights, applicable local laws and regulations, and the Limak Çimento Code of Conduct set out below.

1. Child Labor

Suppliers undertake not to employ workers under the age of 16, in accordance with internationally and locally recognized laws and standards. Young workers are employed with due regard for their physical, mental, moral, and psychosocial development. Suppliers provide employment opportunities such as internships and apprenticeships to support the integration of young people into social and working life.

2. Forced Labor

Suppliers declare that employment is based on the principle of voluntary participation. Forced labor refers to any work or service that a person is compelled to perform involuntarily, under threat of penalty. Suppliers also regard requiring employees to work overtime without their consent as a form of forced labor. Forced labor constitutes a fundamental violation of human rights and is unacceptable under any circumstances.

3. Discrimination

Suppliers shall not discriminate among employees on the basis of color, religion, language, race, sect, political opinion, nationality, ethnic origin, age, gender, sexual orientation, or region. Decisions relating to recruitment, promotion, wages and benefits, training opportunities, job assignment, discipline, and termination shall be based solely on an employee's professional background and ability to perform the job.

4. Bullying and Harassment

Suppliers undertake to provide their employees with a working environment consistent with human dignity and universal humanitarian principles. No employee, whether in superior-subordinate relationships or in any other context within the company or workplace, shall be subjected to bullying, harassment, degrading or menial treatment, or mobbing.

5. Freedom of Association

Suppliers recognize their employees' right to join and take part in internal and external organizations of their own choosing — such as political parties, associations or foundations, employee representative bodies, and trade unions — as a constitutional and democratic right, provided this is exercised in compliance with local legislation and regulations.

6. Wages and Benefits

Suppliers undertake to develop a fair and competitive wage policy. Wages are determined with reference to the legal minimum wage, average wages within the sector, and the company's strategic objectives, alongside an approach designed to enhance employee motivation and performance. Suppliers ensure that employees receive the full range of fringe benefits to which they are legally entitled.

7. Occupational Health and Safety

Suppliers regard human life as their most valuable asset and comply with applicable legal requirements concerning occupational health and safety. They prioritize the health and safety of their employees, take all necessary precautions, and provide protective equipment free of charge. Operations are conducted in line with internationally and locally recognized standards, with the goal of "zero workplace accidents."

8. Protection of Personal Data

Suppliers comply with applicable laws and regulations governing the protection of personal data and undertake that all data will be processed in accordance with internationally and locally recognized standards.

9. Anti-Bribery and Anti-Corruption

Suppliers regard the fight against corruption as an integral part of their operations and ensure that all employees act in accordance with this principle. Suppliers also support their employees in receiving training on anti-corruption practices.

10. Environment, Biodiversity, and Deforestation Prevention

In conducting their operations, Suppliers comply with applicable laws and regulations as well as internationally and locally recognized environmental management standards (covering water, carbon, waste, and related areas). While enhancing the quality of their products and operations, Suppliers aim to minimize their negative environmental impact and to help ensure a sustainable environment is passed on to future generations. They undertake to reduce pollution at the source, advance reuse and recycling practices, and carry out and monitor efforts to prevent net deforestation through the protection of natural forests, sensitive ecosystems, and Key Biodiversity Areas.

Suppliers acknowledge that their business practices are subject to audit. All Suppliers must be authorized by Limak Çimento, and each Supplier is responsible for ensuring that this Code of Conduct is also applied by its subcontractors.

Limak Çimento reserves the right to terminate its business relationship with any company that violates this Code of Conduct. For any questions, complaints, or suggestions regarding the Code of Conduct and its implementation, please contact sustainability@limakcement.com or reach out to the Limak Çimento Sustainability Department.

M. Erkam Kocakerim

GLOBAL CEO

