

BozBros Supply Chain Compliance Policy

General Principles

BozBros places significant importance not only on product and service quality, technical competencies, and pricing when selecting business partners, but also on corporate reputation, adherence to ethical standards, and financial stability. We meticulously evaluate compliance risks in our relationships with business partners and adopt a risk-based approach to managing these risks. To ensure that our partners comply with all applicable laws, BozBros policies, and ethical principles, we conduct a continuous assessment process. The key components of this policy are detailed below:

- 1. Sanctions and Export Control Regulations:** Regular evaluations and assessments are conducted to ensure that our business partners have no relationships with sanctioned individuals or entities. We aim to guarantee that our partners do not engage in illegal activities such as bribery, corruption, money laundering, human rights violations, or financing terrorism. These processes are carried out in full compliance with all applicable personal data protection legislation.
- 2. Due Diligence Assessments:** Before establishing business relationships and at regular intervals during the ongoing relationship, due diligence assessments are conducted. These assessments evaluate the ethical and compliance risks of our partners. Critical information, such as whether a partner is a public official or a politically exposed person, is verified through internet, media searches, and various databases. If any risks or non-compliance are detected, an expanded due diligence assessment may be conducted.
- 3. Training and Audits:** BozBros provides training to partners when necessary to ensure compliance standards are upheld. We also audit our partners' adherence to our policies and ethical principles, making these processes continuous where needed. These audits contribute to the effective management of risks and the development of our partners.
- 4. Compliance Clauses in Contracts:** All contracts with partners include provisions stating that the contract may be terminated if any situation contrary to BozBros compliance policies is detected. These provisions protect BozBros's rights to audit and impose sanctions, allowing us to initiate necessary legal processes in case of non-compliance.

Partner Acceptance Process

BozBros's partner acceptance process is rigorously conducted before and during business relationships. In this process, managing compliance risks is prioritized. Before starting to work with a new partner, the following elements are considered:

- 1. Evaluation of Sanction Risks:** It is verified whether the partner is listed on any sanctions list. The partner's status is examined in detail under sanctions, export control regulations, and anti-corruption laws. These examinations are conducted in accordance with data protection legislation, utilizing existing databases and other screening tools.
- 2. Bribery, Corruption, and Other Compliance Risks:** Prior to establishing a business relationship, comprehensive research is conducted to ensure that the partner has not engaged in any illegal activities such as bribery, corruption, money laundering, financing terrorism, or weapons of mass destruction. Detected non-compliance or risks will determine whether to continue the relationship with the partner.
- 3. Identification of Public Officials and Politically Exposed Persons:** An investigation is conducted to determine if partners are public officials or politically exposed persons, and any identified risks are reported to relevant units. This process is crucial to ensure that our partners operate impartially and in accordance with the law.

Guiding Principles for Partners

At BozBros, we expect all our partners to fully comply with ethical, legal, and environmental responsibilities. We require our partners to act in accordance with these principles:

- 1. Compliance with Legal Regulations:** Our partners must fully comply with all applicable laws in the countries where they operate. This includes competition laws, anti-money laundering and anti-terrorism financing regulations, data privacy regulations, and anti-corruption laws. BozBros monitors our partners for compliance with these laws.
- 2. Anti-Bribery and Anti-Corruption:** Our partners must adopt a zero-tolerance policy against bribery and corruption in their business activities. Providing or receiving anything of value to gain unfair advantage is strictly prohibited. Our partners should adopt honesty and transparency in all commercial activities and maintain accurate business records.

3. Respect for Human Rights: We expect our partners to operate in accordance with BozBros Human Rights Policy and to avoid practices such as child labor and forced labor. Partner activities should comply with International Labour Organization (ILO) standards and the United Nations Universal Declaration of Human Rights.

4. Compliance with Labor Laws and Working Conditions: Our partners must fully comply with the labor laws of the countries in which they operate. Compensation and social benefits should be provided in accordance with applicable laws, and working hours and conditions must be regulated within the limits established by law.

5. Health and Safety: Our partners are required to provide a safe and healthy working environment for their employees. All workplaces must implement occupational health and safety measures effectively, and necessary precautions should be taken quickly in case of any hazard. Risks to employee health must be continuously monitored and improvement efforts undertaken.

6. Environmental Protection: Our partners should implement effective environmental management systems to minimize their impact on the environment. Reducing greenhouse gas emissions, improving waste management, and enhancing energy efficiency are fundamental environmental responsibilities expected from our partners. BozBros is committed to working with partners who adhere to principles of environmental protection and sustainability.

Ethical and Compliance Processes

BozBros expects its partners to conduct their activities fairly, honestly, and transparently. Partner business processes must comply with international agreements to which the Republic of Turkey is a party, as well as the United Nations Global Compact. Partners are also expected to avoid conflicts of interest and refrain from engaging in any unethical activities.

Reporting and Audit Processes

Partners are encouraged to report violations, non-compliance, or negative situations they encounter in their activities in a timely manner and to take appropriate measures. BozBros establishes secure communication channels through which partners can report such incidents without fear of retaliation.

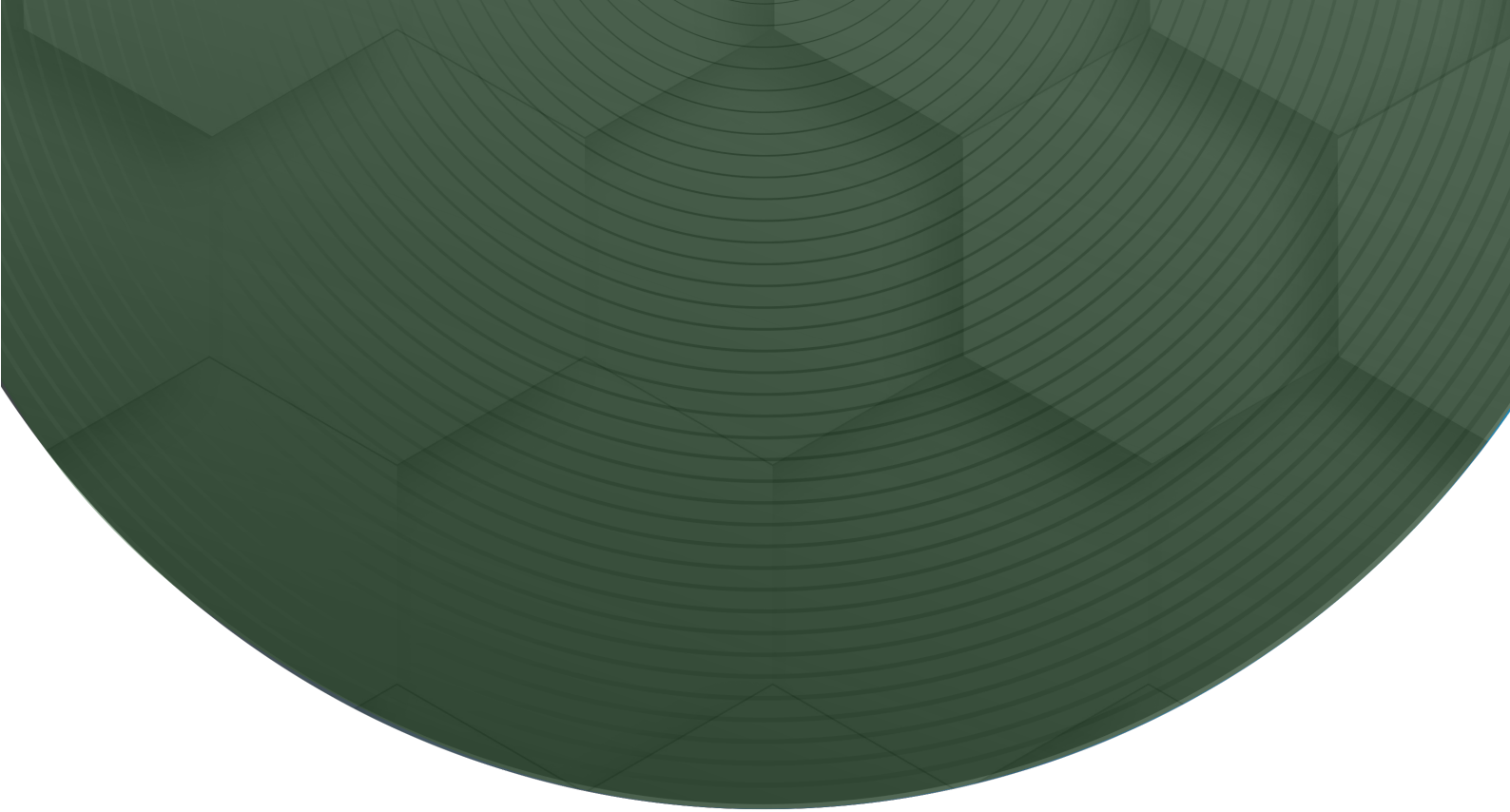
Training and Development Programs

Partners should organize training programs to contribute to the development of their employees and engage in activities aimed at enhancing their professional skills. BozBros supports and encourages partner participation in such programs.

Management Systems and Continuity

BozBros expects partners to have effective and functioning management systems in place to ensure compliance with legal regulations and the principles outlined in this policy. These management systems enable partners to achieve sustainability goals and effectively manage their business processes.

BozBros Board of Directors



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