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FARPLAS AUTOMOTIVE

SUPPLIER BUSINESS ETHICS AND CODE OF CONDUCT MANUAL


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1. OBJECTIVE

Farplas aims to manage all its operations effectively, reliably and ethically with the understanding of sustainability and social responsibility. In this direction, the effective use of limited natural resources, the creation of environmentally sensitive production processes by keeping the quality high, and contributing to economic and social development constitute the cornerstones of Farplas' vision.

Farplas adopts a transparent, fair and ethical approach towards all stakeholders - customers, shareholders, employees, suppliers and other stakeholders - at every stage of the supply chain, from raw material procurement to production, distribution, sales and after-sales services. Respect for human rights, work force safety, environmental and quality standards are the basis of our supplier relations.

The Farplas Supplier Business Ethics Principles have been created to ensure that our suppliers act in compliance with Farplas' values and the legal rules in the countries we operate in. These principles are a mandatory document that our suppliers must sign and comply with in all their operations. In addition, our suppliers are expected to develop a similar business ethics policy in their own supply chains.


While we conduct our activities with integrity, transparency and respect for human rights, our suppliers must also adopt and implement these principles. The Supplier Business Ethics Principles determine the standards of behavior expected from our suppliers and provide guidance on issues such as combating corruption, improving working conditions, information security and ethical behavior in external relations.

Farplas takes into account the different legal systems in the countries where suppliers operate. However, unless a specific situation is regulated, solutions must be produced by making prudent and objective decisions that are in line with the spirit of the Supplier Business Ethics Principles and Farplas' values.

2. SCOPE

This Manual covers Farplas Automotive Inc. subcontractors and suppliers. As Farplas, we expect all parties to fully comply with the principles of the current Farplas Supplier Business Ethics and Code of Conduct Manual .

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3. DUTIES AND RESPONSIBILITIES

The Purchasing Department is responsible for the implementation of the Supplier Business Ethics and Code of Conduct Manual. All our units and employees are obliged to fulfill the requirements of this policy and act in accordance with these principles in their business processes.

Supplier Commissioning and Auditing

Companies that want to work with Farplas must contact Purchasing and submit the "Supplier Application Form" and the requested documents. After the application, the relevant departments evaluate the application and mutual visits are planned with the companies that are deemed appropriate. "New Supplier Proposal Risk Audit" is carried out during the first visit. The answers given are a commitment for the supplier.

Contracts

In the contracts made with Farplas, the Farplas Supplier Business Ethics Principles and Code of Conduct are clearly stated. By signing this document, the supplier agrees to comply with all the principles and rules contained in this code of ethics and conduct as a primary obligation, in addition to the obligations included in the supply contracts, even if not explicitly stated in the contracts. Suppliers are obliged to fully comply with these principles and this obligation is an integral part of the contract.

4. GENERAL PRINCIPLES

4.1 LEGAL APPLICATIONS


4.1.1 Trade

Farplas fully complies with international export, import and trade laws in all its commercial activities. Our suppliers are also obliged to comply with global trade regulations, export and import laws and related regulations. These laws include embargoes, trade sanctions, customs regulations, country of origin labeling rules and anti-boycott laws.

4.1.2 Fair Competition and Antitrust

Farplas supports fair competition in all markets where it operates and takes a clear stance against practices that restrict competition. Our suppliers are also obliged to fully comply with local and international competition legislation. Practices that violate antitrust laws, such as cartel formation, price fixing, market sharing, are not allowed in any way. Protecting competition is not only a legal obligation, but also an ethical responsibility.

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Our expectation from our suppliers is that they adopt this understanding in their business relations and avoid any behavior that may harm the fair competition environment.

4.1.3 Export Control and Economic Sanctions

Full compliance with export control, economic sanctions, embargoes and customs regulations in all regions where Farplas operates is essential. Our suppliers must comply with all applicable laws and regulations regarding international trade — particularly embargoes, boycotts, export licenses and sanctions.

Violation of these rules may not only result in loss of business reputation, but may also result in serious sanctions such as administrative fines, license revocations, and even imprisonment. Suppliers are obliged to follow current regulations in the countries in which they operate and to take the necessary measures accordingly .

4.1.4 Fighting Bribery, Corruption and Money Laundering

Our suppliers must not take or give bribes or engage in any corrupt activities for the purpose of business or financial gain. Farplas has a zero tolerance policy against all illegal activities such as corruption, embezzlement, bribery and money laundering. Suppliers are obliged to fully comply with national and international laws and regulations in this regard.

4.1.5 Fake and Suspicious Parts


Farplas strictly prohibits the inclusion of counterfeit or dubious parts in its supply chain. Our suppliers are obliged to supply only original and certified products. The supply of counterfeit or dubious parts can pose serious risks in terms of both safety and quality and can lead to legal liabilities. The use of such parts damages the reputation of our company and can lead to legal problems. Our suppliers are obliged to document the quality and originality of the parts they supply. In addition, all our suppliers must take the necessary measures to combat counterfeiting, fraud and other illegal activities.

4.2 ETHICAL RULES

4.2.1 Data Protection and Data Security

Farplas expects all its business partners and suppliers to comply with all applicable legal regulations regarding the protection of personal data and sensitive commercial information. Suppliers are obliged to ensure the security of data belonging to employees, customers and third parties, to use this information only for permitted purposes and to take all necessary technical and administrative measures against unauthorized access, disclosure, modification or destruction.

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The same sensitivity applies to Farplas. Confidential information belonging to our suppliers is used only to the extent required by the business and with appropriate security measures; it is not shared with third parties without permission. In the event of a suspected data breach, the relevant parties must be informed immediately.

4.2.2 Financial Responsibility (Accurate Records)

Farplas is committed to recording all financial transactions in a transparent, accurate and traceable manner. Accordingly, our suppliers are also expected to keep their accounting records, commercial documents and financial reporting in accordance with applicable laws, accounting standards and internal control procedures.

Under no circumstances should false documents be prepared, income or expenses be concealed or misrepresented. All records related to the business relationship with Farplas must be open, auditable and preserved in a manner that can be provided upon request.

Financial transparency is not only a legal obligation; it is also the basis for sustainable collaborations based on trust.

4.2.3 Disclosure of Information


Farplas attaches importance to conducting its activities in a transparent and responsible manner. However, this principle of transparency does not include the unauthorized disclosure of confidential or trade secret information. Our suppliers are expected to make the necessary disclosures only within the framework of applicable legal regulations and contractual obligations.

No information belonging to Farplas or obtained within the scope of cooperation with Farplas should be shared with third parties without prior written approval. Similarly , Farplas uses and protects confidential information belonging to its suppliers only to the extent required by the business and in accordance with the relevant confidentiality provisions.

4.2.4 Conflict of Interest

Farplas aims to prevent all of its suppliers from having personal, financial or family interests that are contrary to the principle of impartiality and honesty in business relations. Suppliers must avoid any conflict of interest that is contrary to the company's interests and ethical rules.

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Suppliers must make business or commercial decisions solely in a professional and objective manner, independent of the influence of their personal interests. If a conflict of interest exists, it must be reported immediately. Farplas expects conflicts of interest to be managed and resolved transparently.

4.2.5 Intellectual Property

Farplas fully respects its own intellectual property rights (brand, patent, design, etc.) and the intellectual property rights of suppliers. Suppliers cannot use, reproduce, or distribute Farplas' or third party's intellectual property rights without permission, and accept that they will be legally responsible in the event of violation.

4.2.6 Protection Against Whistleblowing and Retaliation

Farplas encourages voluntary reporting of unethical behavior, illegal practices, and violations of company policies. Our suppliers must provide transparent and accessible mechanisms within their organizations for employees to make such reports in confidence.

No employee or supplier representative should be subject to dismissal, threats, exclusion or retaliation of any kind because of a good faith report. Any retaliatory behavior is considered a serious ethical violation by Farplas.

4.2.7 Receiving, Giving and Entertaining Gifts


Farplas adopts an approach that is transparent, honest and free from conflicts of interest in its business relations. In this context, we expect our suppliers to act in accordance with ethical rules in matters such as gifts, hospitality and entertainment.

Invitations from suppliers for meals, meetings and social events may be accepted as long as they are for business purposes and within reasonable limits. However, it is important that these invitations do not conflict with Farplas' interests and company policies.

Suppliers should not offer any gifts, payments, entertainment or hospitality intended to influence business decisions. If such situations are detected, Farplas will evaluate the situation with the relevant departments and take the necessary actions.

4.3 WORKING RULES

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4.3.1 Child Labour and Young Workers

Farplas categorically rejects all forms of child labour. Suppliers are expected to fully comply with applicable national laws and International Labour Organisation (ILO) child labour standards. The employment of children of compulsory school age is unacceptable.

In the event that young workers are employed, they must be employed in safe conditions that will not jeopardize their physical and psychological development or hinder their education, and within legal limits. Farplas expects its suppliers to provide the necessary policies and controls in this regard.

4.3.2 Wages and Benefits

Suppliers must pay their employees fairly, on time and in full, at least the minimum wage, in line with applicable labor laws and industry standards. All fringe benefits, such as overtime pay, vacation and leave entitlements, must also be provided in accordance with legislation.

Farplas is committed to cooperating with suppliers who consider the economic well-being of employees and adopt a transparent, fair and lawful approach to their remuneration systems.

4.3.3 Working Hours

Suppliers must determine the working hours of their employees in accordance with applicable laws and regulations and adopt fair and humane practices in line with international standards. Maximum daily and weekly working hours must not be exceeded, and overtime must be voluntary and fairly compensated.

Farplas sees it as a fundamental responsibility to ensure that employees have adequate rest periods and that their work-life balance is respected. It expects the same sensitivity from its suppliers.

4.3.4 Modern Slavery (Slavery, Servitude, Forced and Compulsory Labor, Human Trafficking)


Farplas does not tolerate any form of modern slavery. Suppliers must ensure that employees work of their own free will and that no individual is forced to work through threats, coercion, debt or other means. Forced labour, human trafficking, withholding of passports or identity documents, restrictions on freedom of movement etc. are completely unacceptable.

Suppliers are obliged to protect the freedom of employees throughout the entire employment period, starting from the recruitment process, and to establish effective mechanisms against such abuse.

4.3.5 Freedom of Expression

Farplas is committed to protecting and promoting employees' freedom of expression within legal and ethical boundaries. An environment where different opinions can be shared freely supports both individual

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development and institutional progress. Farplas has an “open door” policy where all employees can openly express their concerns, suggestions and complaints.

We expect our suppliers to adopt a similar culture of open communication in their own work environments. It is important for them to establish a structure where employees can freely express their ideas, ask questions and, when necessary, resort to complaint mechanisms. This culture will strengthen employee loyalty and psychological safety in the workplace, and create a sustainable and peaceful work environment in the long term.

4.3.6 Ethical Recruitment

Farplas expects all its suppliers to adopt transparent, fair and ethical recruitment practices and to promote diversity, equality and inclusion in their recruitment processes. The recruitment process for employees must be voluntary, non-discriminatory, and conducted in an open and understandable manner.

Under no circumstances may illegal fees or commissions be taken from employees during recruitment. In addition, if suppliers use intermediary institutions in their recruitment processes, they must ensure that these institutions also act in accordance with ethical principles and inclusive recruitment standards.

Suppliers must ensure that employees are fully informed and accept all contract terms prior to starting work and that documentation is provided in a language that employees can understand.

4.3.7 Freedom of Association and the Right to Collective Bargaining

Farplas respects the freedom of association of its employees and expects all its suppliers to do the same. Employees have the right to freely elect their own representatives, to form a union or to join an existing union. This right must not be impeded or penalized in any way.


Suppliers have the obligation not to violate the collective bargaining rights of employees and must fully recognize these rights by respecting collective bargaining processes. They must also create an environment that will protect the rights of employees and ensure their independent representation.

Farplas expects all its suppliers to act in accordance with these principles and to ensure free communication and representation in their workplaces.

4.3.8 Discrimination and Harassment

Farplas is committed to providing equal opportunities to its employees and promoting diversity, equality and inclusion in all workplaces. Discrimination, harassment, bullying or any behaviour that degrades human

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dignity is completely unacceptable. Our suppliers must also embrace these values and have a zero tolerance policy against any form of discrimination.

Discrimination cannot occur on the basis of race, color, religion, gender, age, disability, nationality, ethnicity, sexual orientation or any other discrimination. Likewise, harassment, sexual harassment, psychological bullying, verbal or physical threats are completely prohibited.

Suppliers are responsible for ensuring that all employees work in a safe and respectful work environment and must promptly report any incidents of discrimination or harassment.

4.3.9 Women's Rights

Farplas encourages women's participation in the workforce and equal opportunities based on equal rights. Ensuring that our female employees have equal opportunities and implementing a zero tolerance policy against gender discrimination is our most important responsibility. Our suppliers must also adopt these principles and create an environment that supports women to find equal opportunities in their working lives.

Protecting women against discrimination, violence, harassment and exploitation in the workplace and developing fair and inclusive policies against all forms of discrimination should be a priority.

Suppliers must ensure that their female employees have equal rights in recruitment, training, salary and promotion opportunities and implement practices that eliminate gender-based discrimination.


4.3.10 Diversity, Equity and Inclusion

Farplas is committed to providing a workplace environment that supports diversity, equality and inclusion. We value the diverse backgrounds, experiences and perspectives of our employees and believe that this diversity contributes to the development of innovative ideas and the growth of our business.

Our suppliers must create a working environment where every individual has equal opportunities and is protected against discrimination, prejudice and exclusion, and eliminate any discrimination based on gender, race, ethnicity, disability, age and other personal characteristics.

Policies that promote diversity and inclusion should be incorporated into all processes of the company and an equitable approach should be adopted for all employees.

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4.3.11 Rights of Minorities and Indigenous Peoples

Our suppliers must fully respect the rights of minorities and indigenous peoples in the regions where they operate and refrain from any practices that would lead to the violation of these rights. They are expected to adopt a sustainable, fair and ethical approach in order not to harm the lands or habitats of indigenous peoples. Suppliers must comply with all legal regulations on minority rights, in line with local laws and international human rights conventions. It is essential that indigenous peoples are included in decision-making processes in accordance with their own will and participation.

4.3.12 Use of Private or Public Security Forces

Our suppliers must prevent private or public security forces from using disproportionate force in their activities on communities, and must implement security measures only within the legal framework and when necessary. They must oppose any use of force that violates the rights of communities, and establish the necessary monitoring and oversight mechanisms for security force interventions. Suppliers must make every effort to ensure that security forces are effectively monitored and human rights are respected. In addition, the rights and living spaces of communities must be prioritized when implementing security measures.

4.3.13 Animal Welfare


As Farplas, we act in accordance with ethical principles in all areas in which we operate. We advocate the protection of animal welfare in all processes where animals are used directly or indirectly. If our suppliers use animals in production, testing, research or any other activity, they must not allow any mistreatment of animals, they must not cause unnecessary pain, stress or harm to animals and they must fully comply with national/international animal welfare standards (e.g. the "Five Freedoms Principles").

In cases where animal use is unavoidable, records should be kept showing that alternative methods have been evaluated, the number of animals used should be minimized, and conditions befitting human dignity should be provided.

4.4 OCCUPATIONAL HEALTH AND SAFETY

Farplas prioritizes the health and safety of its employees. Ensuring that working environments are healthy, safe and sustainable for all employees is a responsibility we expect from our suppliers. In this context, our suppliers must be fully compliant with local and international legislation on occupational health and safety and must not cause any situation that would put the health and safety of their employees at risk.

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Our suppliers must take and implement the following measures:

- To take all necessary precautions to ensure the safety of employees at work, to conduct risk analyses and to keep security measures up to date.
- To contribute to the development of safe working habits by providing regular occupational health and safety training to employees.
- To create emergency plans and ensure that these plans are implemented effectively, and to inform employees about emergencies.
- Providing appropriate equipment and protective gear to minimize health and safety risks in the workplace.
- In the event of any health or safety violation, initiate the necessary reporting processes and take rapid action to protect employees.

Farplas expects the importance given to occupational health and safety to always be at the forefront and for our suppliers to approach these values with the same sensitivity.

4.5 ENVIRONMENTAL SUSTAINABILITY

4.5.1 Greenhouse Gas Emissions and Decarbonization


Farplas develops strategies to minimize carbon emissions in its production processes to reduce greenhouse gas emissions and achieve decarbonization targets. It monitors greenhouse gas emissions, uses technologies to reduce these emissions and turns to clean energy sources. It implements solutions that increase energy efficiency to reduce its carbon footprint.

To contribute to these goals, our suppliers must also participate in efforts to reduce carbon emissions and use sustainable energy solutions. They must monitor their carbon footprint and report to Farplas when requested.

4.5.2 Energy Efficiency and Renewable Energy

Farplas adopts a sustainable approach to energy efficiency and renewable energy use. It continuously improves its production processes to optimize energy consumption and invests in energy-saving technologies. It also minimizes environmental impacts and aims to reduce its carbon footprint by increasing the use of renewable energy sources.

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Our suppliers must also fulfill their environmental responsibilities by developing strategies to increase energy efficiency and using renewable energy sources. They must monitor their energy consumption and take steps for efficient energy use.

4.5.3 Responsible Chemical Management

Farplas acts responsibly in the use of chemicals in order to minimize environmental impact and prevent occupational health and safety risks. The processes for safe storage, transportation, use and disposal of chemicals are strictly monitored. Our suppliers must use only approved and safe chemicals, take the necessary precautions against harmful effects and fully comply with legal regulations.

All activities related to the use of chemical substances must be regularly monitored and the use of safer alternatives to substances that pose a risk of harm to the environment and human health must be encouraged. Our suppliers are obliged to provide the necessary training for the safe and sustainable management of chemical substances and to report regularly to Farplas.

4.5.4 Water Quality, Consumption and Management


Farplas attaches great importance to using water resources sustainably and preserving the quality of water. Water is a critical resource in all our production processes and all necessary precautions are taken to use water economically and prevent pollution.

Our suppliers must ensure that water is used responsibly, that wastewater is treated in a way that does not harm the environment. They must also develop innovative solutions to minimise water consumption. Protecting water quality, reducing environmental impact and sustainability of water resources are key responsibilities we expect from our suppliers.

4.5.5 Air Quality

Farplas is committed to minimizing the impact of its activities on air quality. We protect the environment and monitor public health by controlling harmful gas emissions in our production processes. We use innovative technologies to improve air quality and comply with local and international air quality standards. Our suppliers must take all necessary measures to prevent air pollution and minimize harmful emissions in their production processes. This responsibility is a criterion that Farplas expects from suppliers to comply with environmentally friendly production methods.

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4.5.6 Sustainable Resource Management

Farplas is committed to using natural resources efficiently and sustainably. We develop strategies for the protection, efficient use of resources and minimization of waste. Sustainable management of resources, both in our production processes and in our supply chain, is a priority for reducing environmental impacts. Our suppliers must use natural resources efficiently and optimize the management of resources to prevent over-consumption. They must also identify improvement opportunities for resource conservation and cooperate with Farplas to achieve sustainability goals .

4.5.7 Waste Management and Circular Economy

Farplas is committed to minimizing waste production and reusing or recycling waste wherever possible. Based on the principles of the circular economy, various strategies are developed to extend the life of products and materials, recycle waste and minimize the use of natural resources. This approach contributes to both reducing environmental impact and making business processes more efficient. Our suppliers must take measures to reduce and reuse waste in their production processes, support recycling processes and contribute to the circular economy model.


4.5.8 Soil Quality

As Farplas, we carry out our production activities in industrial zones in accordance with environmental responsibilities and legal regulations. Our facilities are located in areas suitable for industry, away from agricultural production areas, and our activities do not have a direct polluting effect on the soil. We adopt the "non-pollution" principle to prevent soil pollution. We expect the same approach from our suppliers. Our suppliers are expected to implement practices that protect soil quality in their own operations and supply chains, act in accordance with environmental legislation and establish systems to prevent polluting effects.

4.5.9 Biodiversity and Deforestation

Farplas is committed to protecting biodiversity and preventing deforestation. In our business activities, we operate without harming ecosystems and preserving natural habitats. Protecting biodiversity is essential to maintaining ecological balance and preventing species from becoming extinct. Protecting forest ecosystems plays a vital role not only for the environment but also in combating climate change. We expect our suppliers to avoid harmful practices that may affect biodiversity in the areas where they operate, to produce in environments that contribute to the protection of biodiversity, and not to participate in projects that may cause deforestation.

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4.5.10 Land, Forest and Water Rights and Involuntary Evictions

Farplas respects land, forest and water rights and attaches great importance to the sustainable management of these resources. Suppliers must not harm the land and water rights of local communities during their operations and must refrain from forced evictions. Violations of these rights can harm the environment and communities and negatively impact the company's operations. Farplas has a zero-tolerance policy towards such practices and expects its suppliers to be responsible in this regard.

4.5.11 Conflict Minerals

Farplas adopts a transparent and responsible supply chain management that respects human rights; it monitors the source of raw materials used in the supply process within the framework of ethical and sustainable principles. In this context, it is of great importance to ensure that minerals such as tin, tantalum, tungsten and gold extracted from conflict zones – i.e. "conflict minerals" – do not finance illegal armed groups.

Suppliers are expected to ensure that the origin of the minerals they use in their products is traceable, to declare that they source from conflict-free sources and to act in accordance with Farplas policy. Farplas acts in full compliance with international regulations and industry standards in this regard and requires its suppliers to assume the same responsibility.

4.5.12 Noise Emissions


Noise can affect not only employee health but also the quality of life of surrounding communities. Therefore, keeping noise levels within legal limits during production processes and facility operations is one of our primary goals.

A similar environmental sensitivity is expected from our suppliers. They must regularly monitor their noise emissions and take the necessary technical and administrative measures to prevent them from reaching levels that are disturbing to employees and the surrounding community. Improvement efforts to reduce noise sources should be considered as part of sustainable production.

4.6 DISSEMINATION OF ETHICAL STANDARDS IN THE SUPPLY CHAIN

Farplas expects not only its own suppliers but also the sub-suppliers with whom its suppliers work to act in accordance with these business ethics principles. Suppliers must take the necessary steps to ensure that our ethical principles are adopted throughout the supply chain and encourage their own suppliers to comply

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with these standards. This approach plays a fundamental role in creating a sustainable and responsible business environment.

4.7 NOTIFICATION MECHANISM

Supplier employees who believe that the Supplier Business Ethics Principles have been violated are expected to report the situation to the Farplas Ethics Line as soon as possible. This mechanism aims to prevent unethical behavior and to support the principle of honesty and openness in business relations with our company.

The Ethics Line may be used in the following situations, but is not limited to:

- Violation of Supplier Business Ethics Principles,
- Illegal transactions, faulty governance, abuse of professional position,
- Practices that may harm health, safety and the environment,
- Failure to comply with legal obligations in the countries of operation,
- Any conduct that may harm Farplas' operations or reputation.

Farplas does not disclose the identity of the persons making a report without the express consent of the person and ensures that such persons are not subject to any form of pressure, discrimination or retaliation.

The identity of the person making the report may only be disclosed in the following cases:

- The person must openly share his/her identity,
- Identity is necessary for official authorities to conduct an effective investigation,
- The applicable laws require this.

Notification Channels


Reports of unethical situations can be made through the Farplas Ethics Line, which is managed confidentially. The person making the report:

- You can make an anonymous report,
- You can choose to receive a direct response by sharing your contact information,

To reach the Ethics Line,

- Email: ethics@farplas.com
- Web page: [Farplas Ethics Line Reporting Form](https://farplas.com.tr/etik.php) (<https://farplas.com.tr/etik.php>)

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5. ENFORCEMENT AND REVIEW

This Manual is reviewed periodically and updated when deemed necessary. The Sustainability and OHS and Purchasing Departments are responsible for updating the Manual.

6. PUBLISHING AND STORING THE DOCUMENT

This Manual is published on our corporate website, open to access by all our stakeholders, in line with our principles of awareness, information and transparency.

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I undertake that I have carefully read and understood all the principles, rules and expectations in this manual and that I will act in accordance with these rules.

As a supplier, I declare that I will operate in accordance with Farplas' Business Ethics Rules and Sustainability Principles and that I will ensure that all my relevant employees act in accordance with these rules.

Company Name :

Authorized Name Surname :

Title :

Signature / Stamp :

Date :

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