

Vestel Supplier Code of Conduct

As a member of Zorlu Group, one of the signatory member of UN Global Compact Principles, Vestel adheres to apply world class standards in empowerment of human rights, environmental protection, health and safety of society. Vestel requires its suppliers to operate in accordance with the principles in this "Supplier Code of Conduct" and in full compliance with all applicable laws and regulations.

Although the Supplier Code of Conduct only applies to Vestel's direct suppliers, Vestel encourages the supplier to invite its own suppliers to comply with its terms. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.

Vestel or third party auditors appointed by Vestel may visit the Supplier to evaluate whether the Supplier is complying with the Code. If detection of any violation of this Code, Vestel may suspend or terminate the business with corresponding Supplier.

1. Labor and Human Rights

Vestel expects the supplier to comply, as a minimum, with all applicable local laws and regulations related to labor and human rights, but not limited to, child worker, maximum hours of work, anti-discrimination, wages and benefits, freedom of association and collective bargaining.

- **Prevention of Child Labor:** Suppliers are not allowed to employ child labor in any stage of operation. Child labor term is recognized and defined by ILO Conventions No. 138 which prescribe a minimum age for admission to employment or work that must not be less than the age for completing compulsory schooling, and in any case not less than 15 years. Lower ages are permitted for transitional periods – in countries where economic and educational facilities are less well-developed the minimum age for regular work generally is 14 years, and 12 years for "light work". The minimum age for hazardous work is higher, at 18 years for all countries.
- **Maximum hours of work:** Suppliers shall honor applicable laws and agreements regarding maximum working hours, provide appropriate rest periods, adequate days or time off from work.
- **Anti-Discrimination:** Suppliers shall encourage and support efforts to build zero tolerance against any type of discrimination in working environment. Vestel requires that Suppliers not engage in direct or indirect discrimination in work related activities based on age, sexual orientation, color, race, religion, political affiliation, national origin, gender identity, union membership, or any other status.
- **Forced Labor and human trafficking:** Suppliers shall ensure that all work is voluntary. Forced and compulsory work requires to be fully understood and that type of labor is not used in the organization. Any form of human trafficking of involuntary labor through threat, force, or other coercion is prohibited.
- **Wages and Benefits:** Suppliers are expected to provide their employees with fair and competitive compensation and benefits. Compensation and benefits should aim at providing an adequate standard of living for employees and their families. Suppliers shall comply with applicable wage and hour labor laws and regulations governing employee compensation.

- **Humane treatment:** Suppliers shall provide employees with a workplace free of harsh and inhumane treatment, without any sexual harassment and abuse, mental or physical coercion, verbal abuse and free of threats of any such treatment.
- **Freedom of Association and Collective Bargaining:** Suppliers shall respect the rights of workers, as set forth in local laws, to join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

2. Health and Safety

Suppliers are expected to integrate health and safety management practices into all aspects of their business. As a minimum, they shall comply with all applicable health and safety laws, regulations and standards. Proactive actions need to be taken through policies, procedures and management systems in order to support accident prevention in work environment and minimize health risk exposure.

3. Environment

Vestel together with its employees has adopted the general objective of maintaining and improving environmental quality by carrying out environmental impact reviews of all of its operations, production lines and products. In this respect, Vestel expects suppliers to share its commitment by responding to challenges posed by climate changes and working toward protecting the environment. Suppliers shall comply with all the laws, legislation, and administrative regulations and allocate sufficient and appropriate resources in their efforts to:

- Take environmental factors into account when evaluating projects for new products and operations,
- Reduce the use of harmful materials in their products and production processes and to search for materials that are less polluting,
- Reduce, reuse, recycle, and recover waste,
- Ensure savings of energy, water and natural resources by promoting productivity increases and use of new technologies,
- Use recycled/recyclable packaging materials wherever feasible,
- Conduct activities aimed at fostering environmental awareness.

4. Ethics

Suppliers shall conduct their business interactions and activities with integrity and ethical manner.

- **Business Integrity:** Suppliers are expected not to practice or tolerate any form of corruption, extortion or embezzlement. Suppliers may not offer any bribes to Vestel employees for the purpose of gaining any contracts or benefit.
- **Protection of Intellectual Property:** Suppliers shall respect and protect all intellectual property of Vestel against any infringement. Suppliers may not use the Vestel trademark, images, or other materials to which Vestel owns the copyright, unless explicitly authorized.
- **Gifts:** Gifts, entertainment, travel, or any other form of gratuity shall not be given or received by Supplier as a reward, encouragement or improper influence for preferential treatment. This does not apply to the acceptance of occasional gifts of purely symbolic value (gifts such as chocolate, dessert, tea etc.) or business lunch/dinner before, during or after meeting agenda.
- **Conflicts of Interest:** Suppliers that do business with Vestel shall not have any competing interest that may interfere with their ability to make objective decisions to act in the best interest of Vestel. Good judgment is expected as well as avoiding the appearance of a conflict of interest.

All suppliers shall notify Vestel immediately in the event of a potential or actual conflict of interest.