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About the Supply Chain Compliance Policy

Within the scope of Galsan's Sustainability efforts, the company aims to work in cooperation with all its stakeholders in line with the principles of Corporate Social Responsibility (CSR). In this context, we also request our stakeholders to commit to operating in accordance with the same principles.

To become a Galsan supplier, in addition to technical and commercial compliance, alignment with our Sustainability Principles is a mandatory requirement.

Our principles, which are among the supplier evaluation criteria, are documented through findings made before and during the course of business activities. The continuation of business operations may be decided by the responsible process owner or the Corporate Social Responsibility Committee.

Our Corporate Social Responsibility expectations from suppliers for Sustainability are outlined below.



At GALSAN, we believe that sustainable growth is achievable not only through production quality but also through adherence to ethical, environmental, and social responsibility principles.

This guide has been prepared to ensure that all suppliers and business partners engaged in business relationships with GALSAN comply with our sustainability standards. Within the framework of the automotive industry's high quality and traceability requirements, the principles outlined in this guide are based on international system standards such as IATF 16949, ISO 9001, ISO 14001, ISO 45001, SA8000, and ISO 37001. We aim to work collaboratively with our suppliers to ensure compliance and full alignment with the key principles listed below.



Ethics and Governance in Galsan Supply Chain

1-Anti-Corruption

Our suppliers must:

- 1. Avoid all forms of bribery, kickbacks, embezzlement, gifts, or transactions made in exchange forpersonal gain. GALSAN enforces a ZERO TOLERANCE policy in this regard.
- 2. Conduct all business relationships in a transparent, documented, and auditable manner.
- 3. Have access to GALSAN's Ethics Line / Reporting System, through which all violations are reviewed confidentially.
- 4. Refrain from engaging in or maintaining any business relationships with entities involved in money laundering, financing of terrorism, or any other illegal activities. If such situations are identified, GALSAN will immediately terminate the relationship and exercise its legal rights under national and international laws.



2- Conflict of Interest

- 1. Any personal, financial, or familial relationships that may create a potential conflict of interest with GALSAN employees must be fully disclosed.
- 2. Suppliers must not offer gifts, benefits, or privileges to GALSAN employees under any circumstances.
- 3. Business decisions must be based solely on objective performance and compliance criteria.
- 4. Any supplier found to be acting in violation of GALSAN's Ethical Standards will have all related activities subject to audit and review by the Ethics Committee. In cases where the conflict of interest causes material or reputational damage to the company, legal action will be taken accordingly.

3-Financial Responsibility and Transparency

- 1. Suppliers must maintain accurate, complete, and lawful financial records.
- 2. All tax, social security, and customs obligations must be fulfilled in full and on time.
- 3. Upon GALSAN's request, suppliers must be able to provide independent audit access or relevant documentation when necessary.



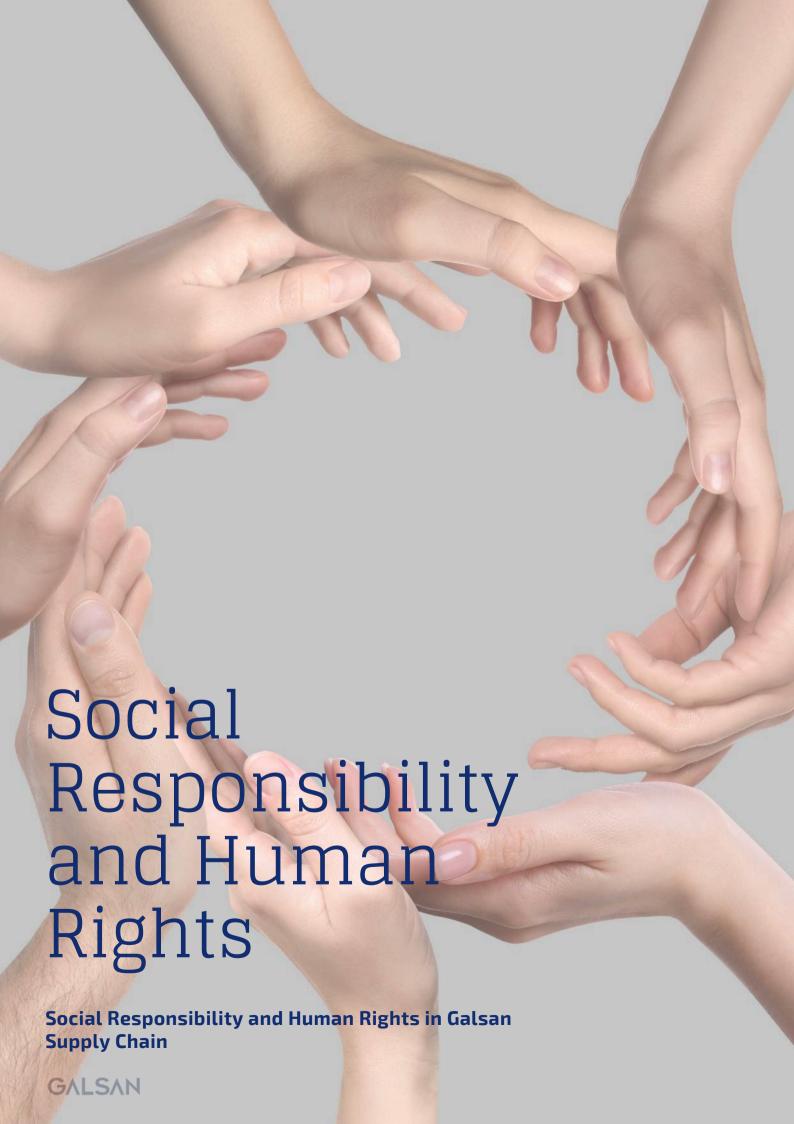
4- Intellectual Property Rights

- 1. Drawings, samples, designs, and technical information belonging to GALSAN may be used solely within the scope of the relevant project.
- 2. The sharing of any information, visuals, or documents with third parties is strictly prohibited.
- 3. Suppliers must ensure that intellectual property rights are respected throughout their own supply chains and that no violations occur.

5- Data Security

- 1. Suppliers must protect all data belonging to GALSAN in compliance with the KVKK (Turkish Personal
- 2. Data Protection Law) and the GDPR (General Data Protection Regulation) for EU countries.
- 3. Appropriate access authorization, encryption, data backup, and cybersecurity measures must be implemented within information systems.
- 4. In the event of a data breach or information leak, suppliers are required to notify GALSAN within 24 hours.





6-Respect for Human Rights

- 1. Suppliers are required to operate in compliance with the ILO Fundamental Conventions.
- 2. Full compliance with national labor laws, including Labor Law No. 4857, and other regulations governing the working environment is expected.
- 3. No form of discrimination will be tolerated.
- 4. The use of child labor, forced labor, discrimination, harassment, mobbing, or any form of mistreatment is strictly prohibited.
- 5. All employees must be provided with fair wages, equal opportunities, and a safe working environment.
- 6. In line with the UN Sustainable Development Goal of "Gender Equality and the Empowerment of Women", suppliers must ensure equal and fair representation of women in the workplace and demonstrate sensitivity toward women's rights.
- 7. Recruitment decisions must be based solely on job-related qualifications, regardless of gender, language, religion, race, color, age, nationality, beliefs, or wealth.
- 8. Employees' freedom of association must be respected, and they must not be prevented from collective bargaining.



7-Occupational Health and Safety (OHS)

- 1. A preventive risk management approach must be implemented to ensure employee safety.
- 2. In accordance with the ISO 45001 standard or relevant legal regulations, accident records, training plans, and emergency procedures must be properly documented.
- 3. Suppliers are required to fully comply with GALSAN's OHS rules when working at GALSAN facilities.



8-Corporate Social Responsibility Awareness

- 1. GALSAN encourages projects that contribute to the welfare of society.
- 2. Suppliers are expected to engage in initiatives that benefit the community in areas such as education, environment, arts, social justice, or volunteering.
- 3. Social responsibility activities should be made reportable on an annual basis.



9- Reduction of Greenhouse Gas Emissions

- 1. Suppliers must measure their carbon footprint and develop plans to reduce it.
- 2. Electricity, natural gas, and fuel consumption data must be monitored and reported annually.
- 3. Intermodal or low-emission logistics solutions should be preferred in transportation processes.



10- Energy Efficiency

- 1. Energy-efficient equipment such as LED lighting, high-efficiency motors, and heat recovery systems should be used in production and office processes.
- 2. Implementation of ISO 50001 Energy Management System practices is encouraged.

11- Chemical Usage and REACH Compliance

- 1. Full compliance with REACH, RoHS, IMDS, and other relevant sectoral chemical regulations is mandatory.
- 2. The labeling, storage, transport, and disposal of chemical substances must comply with applicable legal regulations.
- 3. Material Safety Data Sheets (MSDS) must be kept up-to-date.



12-Waste Reduction and Circular Economy

- 1. Design and production techniques that prevent waste generation must be applied in manufacturing processes.
- 2. The rate of waste recovery and reuse should be monitored annually.
- 3. GALSAN encourages the reduction of plastic in packaging and the use of recyclable materials.

13- Environmental Management System

- 1. Suppliers are expected to hold an ISO 14001 certificate and to implement environmental practices.
- 2. Environmental risk assessments must be conducted in compliance with applicable legal permits and licenses.





14- İzleme, Değerlendirme ve Uyum

- 1. GALSAN monitors its suppliers through periodic sustainability audits, self-assessment questionnaires (SAQ), and on-site visits.
- 2.A Corrective Action Plan (CAPA) is required for any non-compliances identified.
- 3. Sustainability performance is integrated into the Supplier Scorecard.



15- Notification and Ethics Hotline

Suppliers can report ethical, environmental, or social violations through the following channels:

- ★ etik@galsan.com
- +90 545 488 39 00
- www.galsan.com
- Reports are evaluated on the basis of confidentiality and the reporter is protected.

16- Commitment

All suppliers working with GALSAN undertake to comply with the principles specified in this guide and to disseminate these standards to their own subsuppliers.

In addition to the principles listed above, we want Galsan Supply Chain Management to examine our expectations and provide reporting in accordance with the criteria. These reports are examined by the Supply Chain Management and we want them to work within the philosophy of continuous development, and we want our suppliers to report the developments. Compliance with this process is an important part of our supplier selection criteria.

In this context, we will continue to work with the belief that conducting sustainable commercial relations, doing efficient work, and developing our sector nationally and globally will be a reality with the cooperation of all of us.

We support our suppliers to create their own value chains in the same way, and we do not hesitate to establish cooperation.





GALSAN

Thank you for your interest and cooperation.

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