CODE OF CONDUCT

for Business Partners





CODE OF CONDUCT

for **Business Partners**

Version : 1.0

Validity start date : 01 June 2024

Contact : TANSA Güvenlik Sistemleri ve Saat San. Tic. A.Ş.

Sanayi Mah. Sanayi Cad. 54 Pendik, 34906 Istanbul TÜRKİYE

code@tansa.com.tr



since 1962 TANSA

CONTENTS

	Preface	2
	Field of application	
1	Corporate Responsibility	3
2	Environmental and Climate Protection	4
3	Transparency in business relationships	5
4	Honest market conduct	5
5	Protection of Data, Trade Secrets, and Corporate Assets	6
6	Legal consequences of violating TANSA's Code of Conduct for Suppliers and Business Partners	6

PREFACE

TANSA is a leading manufacturer of turnstiles and entrance control gates, with a legacy of excellence in designing and producing innovative passage systems worldwide. Our commitment to corporate responsibility encompasses not only our employees and stakeholders but also the public and the environment. TANSA strictly adheres to all applicable laws and upholds the highest ethical standards. Sustainability and respect for these core values are integral to our operations, driving us to deliver reliable, high-quality products while contributing positively to society and the environment.

TANSA, has committed to the United Nations Global Compact principles, which encompass human rights, labor standards, environmental protection, and anticorruption efforts across ten fields. Furthermore, TANSA adheres to the International Labor Organization (ILO) standards in their contracts.

TANSA also complies with established labor standards. As a concluding aspect, **TANSA** has implemented a Code of Conduct that mandates responsible behavior through binding rules.

The 'Sustainability Conditions (**TANSA** Code of Conduct for Business Partners)' are completed with the following basic principles.

Field of Application

In line with its Corporate Responsibility Strategy, TANSA expects its suppliers (i.e., any contractual partner providing materials, parts, or services to TANSA) and business partners (including those performing intermediary or representation functions such as sales support agents, consultants, intermediaries. representatives, authorized dealers/importers, joint venture and consortium partners, etc.) and their employees to act responsibly and commit to adhering to the fundamental principles of TANSA 's Code of Conduct for suppliers and business partners. If suppliers or business partners engage third parties (e.g., subcontractors or representatives) within the framework of their business relationship with TANSA, TANSA expects these third parties to also commit to adhering to the fundamental principles of TANSA 's Code of Conduct for suppliers and business partners.

TANSA requires that its business partners meet the standards stated below. Compliance is verified by experts, either through prior registration and reporting or in the presence of the business partner's representatives during normal business hours. TANSA also reserves the right to conduct on-site inspections in compliance with applicable laws, especially those concerning data protection.

1 | CORPORATE RESPONSIBILITY

TANSA is committed to corporate responsibility and to complying with all applicable laws. In particular, **TANSA** expects its business partners to adhere to the following basic principles:



Human Rights

TANSA's business partners worldwide are committed to protecting human rights as fundamental principles. They adhere to the Universal Declaration of Human Rights, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the UN Free and Equal Standards, the OECD Guidelines for Multinational Enterprises, and the International Covenant on Civil and Political Rights (dated December 19, 1966). Furthermore, they comply with the ILO Conventions 138 and 182, which set legal age limits for child labor, strictly prohibiting forced and child labor.

otherwise by law. They uphold democratic principles and tolerate differences. Additionally, they are committed to treating everyone with dignity and respect, actively preventing sexual harassment, bullying, abuse of power, intimidation, threats, and other forms of misconduct.

Freedom of Association

TANSA provides all employees with the right to establish unions and businesses representations. participation basis right is recognized. In countries where freedom-rights are restricted by law, alternative lawful businesses representation options will be supported.

Product Safety

TANSA 's business partners follow all applicable regulations for product safety, labeling, and packaging, as well as the use of hazardous substances. They are also required to share their expertise with customers and other stakeholders and to keep **TANSA** informed about the environmental and safety attributes of their products.

Equality of opportunity and non-discrimination

TANSA's business partners do not discriminate on the basis of ethnicity, nationality, social origin, skin color, gender, religion, worldview, age, disability, sexual orientation, or political opinion, unless mandated

Business in place security and study hours

TANSA 's business partners ensure workplace safety and health protection in compliance with applicable legal requirements. They support efforts to continually develop and improve working conditions. Working hours must comply with the minimum standards set by applicable national laws or industry-specific regulations.

Minimum fee

TANSA 's business partners must ensure that their employees receive at least the legally guaranteed minimum wage or a wage that corresponds to a reasonable standard of living. If there is no regulation by law or collective agreement, remuneration should be determined according to industry-specific and regional wage and performance practices to ensure an appropriate standard of living for employees and their families.

We expect our business partners to adhere to a fair wage policy that complies with all applicable local labor and wage laws. If there are no legal regulations or collective bargaining agreements, the remuneration of personnel should be based on sector- and region-specific norms, ensuring a satisfactory standard of living for employees and their families. Our business partners must also comply with International Labor Organization (ILO) Convention No. 100 (Equal Remuneration).

2 | ENVIRONMENTAL AND CLIMATE PROTECTION

TANSA wants to contribute significantly to environmental and climate protection and has therefore determined a climate strategy. **TANSA** from business partners especially the following basis to principles expects them to comply with:

Complying with legal provisions

TANSA' suppliers and business partners take responsibility when it comes to the environmental protection and comply with all local legal provisions related to the environment and sustainability.

Energy and source efficiency increase

TANSA 's business partners use natural resources economically in their production processes and minimize the environmental impact of their products. They contribute to reducing energy consumption and CO $_2$ emissions.

Waste and recycling

We expect our business partners and suppliers to ensure the prevention, reuse and recycling of waste during the development, manufacturing and use of products and other activities, as well as to dispose of the remaining waste in a safe and environmentally friendly manner.



Creating and implementing Environmental Management Systems

We expect our suppliers and business partners to prevent, reuse, and recycle waste during the development, manufacturing, and use of products, as well as in other activities. Additionally, we expect them to dispose of any remaining waste in a safe and environmentally friendly manner.

Embargoed materials

We expect our business partners to take the necessary precautions not to use raw materials produced and financed in conflict zones or high-risk areas in their own production, as well as not to finance armed groups that violate human rights.

3 | BUSINESS IN YOUR RELATIONSHIPS TRANSPARENCY

Your reliability and trust are key components in fostering openness and transparency in your business relationships. TANSA expects its business partners and suppliers to comply with the following basic principles:



Interest from conflicts avoidance

TANSA business partners make decisions based on realistic criteria and do not allow personal interests and relationships to influence these decisions.

Anti-Corruption

TANSA 's business partners do not tolerate corruption. They ensure that their employees, subcontractors, or their representatives do not engage in bribery, make illegal donations, or provide other unlawful benefits to customers, government officials, or third parties. This includes not offering or accepting facilitation payments, which are illegal payments made to expedite routine administrative procedures. We expect our business partners to respect, comply with, and support national and international anti-corruption efforts, such as those led by the United Nations (UN), the Organization for Economic Co-operation and Development (OECD), and the UK Anti-Bribery Act of 2010).

Gifts, hospitality and to events invitations

TANSA 's business partners may not directly or indirectly provide gifts, hospitality or entertainment to TANSA employees or third parties with the aim of influencing them illegally. They neither invite to events to receive unsuitable advantages nor demand or accept such improper invitations to create advantages to themselves or their clients.

Relations with the government and competent authorities as a customer

TANSA 's business partners comply with legal provisions in their dealings with the state, authorities, and public institutions. They adhere to the relevant legal requirements and rules of free and fair competition when participating in public tenders.

Consultants and Intermediaries

TANSA 's business partners use advisors or intermediaries only in compliance with applicable laws. They ensure that fees paid to consultants or intermediaries are solely for actual advisory or brokerage services provided and that the compensation aligns with the performance delivered.

4 | HONEST MARKET CONDUCT

TANSA is an honest and responsible market participant and adheres to its contractual obligations. **TANSA** also expects this from suppliers and business partners, in particular regarding compliance with the following basic principles:

Free competition

TANSA 's business partners comply with laws regarding the protection of competition. They do not enter into anti-competitive agreements with competitors, suppliers, or customers; and if they hold a dominant position in the market, they do not abuse it.

Export control

TANSA's business partners ensure that they comply with all relevant laws regarding the import and export of goods, services and information.

Money laundering

TANSA 's business partners establish business relationships only with those they believe to be honest. They ensure that they do not violate laws related to antimoney laundering. We expect our business partners to comply with legal obligations regarding anti-money laundering and to refrain from participating in money laundering activities.

We also expect our business partners to comply with all applicable laws regarding the import and export of goods, services, and data. Our business partners must adhere to applicable trade restrictions, embargoes, and other regulations.



Commercial information's

TANSA's business partners publish commercial information and prepare reports about their business activities truthfully and in accordance with relevant laws. We expect our business partners to base their decisions objectively and not to be influenced by personal interests and relationships. We also expect them to comply with all applicable laws to protect personnel information and personal data of customers, suppliers, and other affected parties. Additionally, they must respect the protection of information, patents, technical information, and trade secrets belonging to TANSA and third parties. Such information cannot be transferred to third parties without TANSA's express written consent.

We expect our business partners to publish business data and reports regarding their activities truthfully and in compliance with applicable laws.

5 | PROTECTION OF DATA, TRADE SECRETS, AND CORPORATE ASSETS

Confidential data, commercial secrets, and corporate assets must be protected. In particular, **TANSA** expects its business partners to comply with the following basic principles:

Data protection

TANSA's business partners ensure their employees comply with applicable laws regarding the protection of personal data of customers, suppliers, and other stakeholders. We expect our business partners to adhere to all applicable laws to protect personal and personnel information, trade secrets, and company assets of customers, suppliers, and other affected parties.

Protection of know-how, patents, operational and trade secrets

TANSA's business partners respect the know-how, patents, business secrets, and commercial secrets of **TANSA** and third parties. They do not disclose such information to third parties without **TANSA**'s prior written approval or through other unauthorized means.



Organization to their assets approach

TANSA's suppliers and business partners respect TANSA's material and non-material assets and do not use them for unfair or non-business-related purposes. They ensure that their employees, as well as third parties (such as subcontractors or representatives) engaged in business dealings on their behalf, do not damage or misuse TANSA's assets, or use them in ways that are against TANSA's interests.

International supply chain security

TANSA's business partners ensure that the facilities where goods produced for **TANSA** are stored, processed, developed, and loaded are secure. They maintain a trustworthy supply chain and protect these areas from unauthorized access by third parties. Additionally, they ensure that the personnel employed are reliable.

6 | LEGAL CONSEQUENCES OF VIOLATING TANSA'S CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS

TANSA abides by this Code of Conduct and reserves the right to terminate its business relationship with any supplier or business partner that does not comply with these principles, without prior notification. If the supplier or business partner can credibly assure and prove that immediate corrective actions have been taken, and no further violations will occur, **TANSA** may, at its discretion, choose to continue the relationship with preventative measures in place.

7 | ANNEX - 1 NOTIFICATION OF NON-CONFORMITY

Conduct for Business Pa		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	200р	
me and contact inform	action:			
ne and contact inform	iation:			

Please send this report to the following address: TANSA Güvenlik Sistemleri ve Saat San. Tic. A.Ş. - Sanayi Mah. Sanayi Cad. No:54 Pendik 34906 Istanbul TÜRKİYE or: code@tansa.com.tr TANSA is committed to protecting your personal data. TANSA Code of Conduct - Privacy Notice (located at https://www.tansa.com.tr/kurumsal/code/) states that TANSA has obtained information in connection with a TANSA Code of Conduct matter. You can review the way we process and use personal data and find out how you can contact us for any other questions regarding the processing of your personal data.

8 | ANNEX - 2 CERTIFICATION

TANSA requests that your company's Authorized Signature/Legal Representative read the TANSA Code of Conduct for Business Partner and confirm that he/she understands and will comply with the TANSA Code of Conduct for Business Partner by signing the section below and affixing the company seal.
I/we, the undersigned, as the Authorized Signature/Legal Representative of the company listed below, herebacknowledge and confirm that the company understands and will comply with the TANSA Code of Conduct for Busine Partner.
Location/date
Company name
Name surname
Title
Signature / Stamp
2.0