

CORPORATE RESPONSIBILITY POLICY

June,2023

Code of Conduct Escuturco,

We are a responsible and corporate manufacturer with products and solutions that contribute to improving the lives of people around the world. All our activities, include the production, distribution and sale of our products, must be carried out with respect and care for human rights, human safety and health, and the environment. We work through continuous improvement by making sustainability a central issue in all our operations.

Ensuring compliance with the articles of the following Code of Conduct as seen below is the responsibility of all employees and management. In cases of non-compliance, employees are expected and encouraged to report this to the relevant internal authorities. In addition to their complain, our employees are assured by us that there will be no reprisals or other negative consequences due to the escalation of their report toward higher levels in their department.

This Code of Conduct guideline applies to all locations where our company's business is conducted and where our suppliers are required to comply with these rules.

•**Legal Regulations:** The relevant laws and regulations are complied with wherever our company operates in the world. This is the minimum requirement that must be met in accordance with the provisions of this document.

•**Suppliers and Subcontractors:** Suppliers and subcontractors must agree to comply with this Code of Conduct. In the event that suppliers use Subcontractors, it is the responsibility of the supplier to ensure that the subcontractor meets the requirements of this Code of Conduct guidelines. Upon request, Escuturco may notify or request information about subcontractors and the product process from the supplier.

It is the clear request of the company management to manage the process through controlled planning. From the initial request of the customer, to the sending of the final samples and all product and subsequent checks thereafter. The Quality Policy promotes a desire to insure the motivation of all personnel that contribute to the company. This includes all levels from factory operators to management with a continuous improvement and zero defect. This fulfils a working environment where collective consciousness is always the goal.

The specific conditions that must be adhered to regarding the personnel of the organization are explained below.

•**Child Labor:** Child labor is prohibited in all locations where our company operates. No person under the age of 16 shall be employed, management is responsible for ensuring that. For permitted minors, working conditions, working hours and wages are at least appropriate to their age and in accordance with applicable local laws.

- **Forced Labor:** Forced or involuntary labor is not tolerated in any form and is strictly prohibited in the organization.
- **Occupational Health and Safety:** All employees must have a safe and healthy working environment. The organization shall take appropriate measures to prevent accidents or illnesses in the workplace.
- **Discrimination:** All employees will be treated equally, regardless of gender, age, disability, race, religion, nationality, sexual orientation, political beliefs, union affiliation, whether they are employed on a permanent short-term, full-time or part-time contractual basis, in the establishment and termination of employment relations, conditions of employment, promotions and access to training.
- **Harassment and Abuse in the Workplace:** No employee will be subjected to physical, sexual, psychological or verbal harassment or abuse. Wages earned will not be subject to fines or penalties as part of any disciplinary action, unless regulated by internal regulations in accordance with local labor law regulations.
- **Working Hours:** At Escuturco, we are aware of the need for all employees to maintain a healthy balance between work and leisure. Employees are not required to work more than 8 hours per day or an average of 40 hours in a five-day workweek.
- **Compensation:** The level of compensation cannot be lower than the state minimum compensation required by local law and must be paid in accordance with internal compensation regulations.
- **Freedom of Association and the Right to Collective Bargaining:** All employees are free to exercise their legal rights as employees to establish or join organizations representing their interests. No employee shall be subject to intimidation or harassment in the peaceful exercise of these rights. The organization shall also respect the right of employees to collective bargaining.
- **Environmental Compliance:** In accordance with the internal environmental policy, suppliers and subcontractors are required to comply with the environmental laws and regulations in force in the countries where the products are used. In addition, to protect the Company, they must comply with the legal provisions regarding the content of substances whose toxicity may have serious health and environmental consequences.
- **Organizational Monitoring and Compliance:** Management is responsible for implementing and informing employees about their rights, duties and responsibilities under this Code of Conduct. Management is also responsible for maintaining appropriate documentation to demonstrate compliance. Escuturco authorizes external auditors to conduct audits, including confidential interviews with employees by representatives of selected auditing companies.



Kerem Üzümlü
CEO