

INTEGRATED MANAGEMENT SYSTEM

Corporate Responsibility and Ethical Policy

▪ Human Rights

- We are respectful to human rights. We are against forced human labor and human trafficking. We treat everyone equal and fairly. We are sensitive to the traditions and cultures of the Turkey's and countries which we operate, we are act appropriately all legal regulations
- We do not accept language, race, complexion, gender, political thought, faith, religion, cult, age, physical disability and similar reasons discrimination among employees with in the institution.
- PHI Metal Otomotiv believes that all of our employees have rights to working environment in accordance with human dignity, healthy and working in a safe environment.
- Employees are our most valuable assets and our top priority business goal is to ensure the safety of our employees and to protect.
- We believe that our human resource is the most important element of our sustainable growth. We ensure that our employees use their personal rights fully in correct way. We commit employees to be honest and fair approaches, non discriminatory, safety and a healthy working environment.

▪ Ethical Recruitment

- PHI Metal mostly turns to corporate career solution partners to access the personnel resources it needs. Among the candidates who applied to the advertisement, taking into account the criteria determined for the position, interviews are developed with the candidates who are suitable for the position, and the process is concluded with the most suitable candidate determined based on merit.

▪ Preventing the Employment of Child & Young Labor

- Child workers cannot be employed at any stage of production. As PHI Metal, we comply with the age restrictions stipulated by ILO practices regarding the employment of children. This age limitation should not be below the age reached by the child at the end of the compulsory education period and in no case should it be below 15 years of age. However, in countries where the economy and vocational training opportunities are less developed, a lower age restriction applies. The age limit here is 14.

▪ **Wages and Social Services**

- Wages and social services are determined in accordance with the basic principles applicable to minimum wages, overtime and social services required by law.

▪ **Working Hours**

- Working hours rules specified in the laws valid in our country are applied.
- Overtime is only done when the employee volunteers, and the employee is entitled to at least 1 day of vacation after 6 consecutive working days.

▪ **Right to Work Freely**

- Forced or compulsory labor is not performed at PHI Metal. Employees have the right to terminate the employment contract within a reasonable period of time.

▪ **Freedom of Assembly and Association**

- There is a Turkish Metal union in PHI Metal. There is a "union representative" in our company to represent the employees, and all communication between the union and the employer is communicated through the union representatives.
- All blue-collar personnel in our company have all union rights.

▪ **Fighting Corruption**

- The purpose of this article is to encourage other employees of PHI Metal who have serious concerns about any aspect to voice these concerns.
- Employees are the first to notice something is wrong at PHI Metal. 'Whistle-blowing' is viewed by PHI Metal as a positive move that can make a valuable contribution to the efficiency and long-term success of the organisation.
- The highest level of integrity is expected in all business activities and relationships. All forms of corruption, bribery, blackmail and abuse are strictly prohibited. If there are concerns about suppliers, customers and any other relevant party, including our own activities as employees, complaints are expressed in accordance with

the escalation table.

- PHI Metal will not tolerate the exchange of money or gifts to influence the behavior of another person, organization, politician, government employee or authority for commercial or personal benefit.

- **Prohibition of Discrimination and Harassment**

- Discrimination and harassment of any kind against employees is prohibited. This; This includes putting people at a disadvantage due to their gender, race, social group, colour, disability, union affiliation, political opinion, origin, religion, age and pregnancy.

- **Women's Rights**

- Our female personnel working in our company have all the rights provided by law. In addition to their legal rights (marriage, pregnancy, breastfeeding, etc.), we try to make our female employees feel valued on their special days (women's day, birthday).

- **Diversity, Equity and Inclusion**

- We treat everyone equally and fairly. We do not discriminate against language, race, color, gender, political thought, belief, religion, sect or age among employees within the institution, and we attach importance to diversity.

- As PHI Metal, we encourage all kinds of participation of our employees, encourage them in this direction, and attach importance to the suggestions they give.

- **Rights of Minorities and Indigenous Peoples**

- Language, race, color, gender, political thought, belief, religion, sect or differences among employees within the institution.

- **Modern slavery (i.e. slavery, servitude and forced or compulsory labor and human trafficking...)**

- We are against forced labor and human trafficking. We treat everyone equally and fairly. We act sensitively to

the traditions and cultures of Turkey and the countries in which we operate, and act in accordance with all legal regulations.

- We care about the happiness of our employees and their loyalty to the company. We do not allow mobbing of employees in any way.

- **Conflict of Interest**
- We expect employees to avoid any personal, financial, family or other interests that may interfere with their ability or willingness to perform their duties.

- **Protection Against Retaliation**
- PHI Metal complies with all privacy rules within the scope of the personal data protection law. In this context, our company takes measures to prevent retaliation in all matters reported to its authorities.

- **Fair Competition**
- We aim to conduct our business with competing companies in fair, honest and transparent ways. As PHI Metal, we avoid all kinds of anti-competitive agreements and the negative consequences they may cause.

- **Sanctions and Export Controls**
- We ensure that product export or re-export arrangements are made, expressing the relevant country legislation, and that product exports are shipped in accordance with the relevant specifications.

- **Counterfeit Parts / Fake Parts**
- Raw materials supplied and products offered to the customer are registered in the IMDS system. Conformity certificates of the raw materials we supply are obtained from the suppliers; Practical controls are carried out to prevent the use of counterfeit and suspicious parts and their mixing with suitable products.

- **EMPLOYEE CODE OF CONDUCT**

- **Compliance with Laws**

- All employees are responsible for protecting the legality of our company. They are expected to comply with all environmental, safety and fair trade laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and corporate image.

- **Respect in the Workplace**

- All employees are obliged to respect their colleagues. Any kind of discriminatory behavior, harassment or victimization is not allowed in our company.
- Employees must comply with the principle of equal opportunity in all aspects, from recruitment and performance evaluation to interpersonal relations.

- **Protection of Company Property**

- All employees must treat our company's property, whether tangible or intangible, with respect and care.
- Employees; They are expected not to misuse or excessively use company equipment. They are expected to be respectful of all intangible property. This includes trademarks, copyright and other property (information, reports, etc.). Employees use them only to complete job tasks.
- Employees protect company facilities and other tangible property (e.g. company cars) from damage and vandalism whenever possible.

- **Professionalism**

- All employees are expected to demonstrate integrity and professionalism in the workplace.

- **Personal Appearance**

- All employees are expected to comply with our dress code and personal appearance rules.

▪ **Job Duties and Authority**

- All employees must perform their duties with honesty and respect towards customers, stakeholders and society. Managers should not abuse their authority. We expect them to delegate their duties to team members, taking into account their authority and workload. Likewise, we expect team members to follow the instructions of their team leaders and complete their tasks in a timely and skillful manner.
- We encourage “mentoring” throughout our company.

▪ **Privacy**

- Confidential and proprietary information; PHI covers Metal's information that may create a competitive disadvantage, trade secrets, financial and other information that has not yet been disclosed to the public, information regarding personnel rights, and information within the framework of "confidentiality agreements" signed with third parties.
- As PHI Metal employees; We take care to protect the confidentiality and private information of our customers, employees and other relevant persons and organizations we work with. Protects confidential information regarding the activities of Group Companies and uses this information only for PHI Metal purposes; We share this information only with relevant persons within the specified authorities.
- For us, gaining any commercial benefit (insider trading) by leaking any confidential information belonging to PHI Metal is absolutely unacceptable. When leaving our company, we will keep confidential information and documents, projects, regulations, etc. that we have due to our duties. We do not take the work out.

▪ **Health & Safety at Work**

- Occupational safety is the company's top priority, and PHI Metal has all its resources ready to establish a safe working environment. It takes minimum national and international occupational safety laws as a reference to establish a safe working environment, but is not satisfied with this and constantly tries to improve the work environment.
- PHI Metal has a "workplace doctor" every day within legal periods, and employees can reach the workplace doctor.
- PHI Metal offers complementary private health insurance to its employees, and all employees can benefit from health services without having to wait in line at all contracted private hospitals.

▪ **Use of Private or Public Security Forces**

- Our company has a 24/7 security service to protect company security and ensure controlled entry and exit.
- Against possible risks, our company has security cameras at certain points of the factory and is monitored by security personnel.
- In case of unexpected events arising from internal or external sources (work accident, theft, raid, etc.), public security forces are contacted.

▪ **Environment**

- PHI Metal is sensitive about the protection of forests, soil and water resources. We manage the environmental impacts (prevention of air emissions, water/wastewater and soil pollution) that may arise from all our activities with a sense of responsibility.
- To determine all kinds of improvement and development studies that will minimize the environmental impacts of all our companies' activities (chemical supply and use, reduction of greenhouse gas emissions, use of renewable energy resources, energy efficiency, wastewater generation, air pollution, soil pollution) in accordance with their fields of activity. and is responsible for implementing it. Our company has "ISO 14001 Environmental Management System".
- PHI Metal aims for continuous development with an effective environmental management system by providing the necessary technical, financial and human resources to achieve its environmental principles and targets at every stage of raw material selection, production and service activities.
- We expect our companies to implement the best environmental solutions beyond legal obligations and to support any initiative that will help the development and dissemination of environmentally friendly technologies and increase environmental awareness.

▪ **Sustainability at Supplier Chain**

- PHI Metal provides the necessary technical, financial and human resources to achieve its environmental principles and targets at every stage of raw material selection, production and service activities.
- National and international regulations are taken into account in procurement, and attention is paid to whether the raw materials we supply comply with Reach (Registration, Evaluation, Authorization, and Restriction of Chemicals) and RoHS (Regulation and the Restriction of Hazardous Substance) requirements. At this point, suppliers are expected to supply products that comply with PHI Metal Material Specifications.

- It is checked whether the raw materials supplied are registered in the IMDS system and the supplier is expected to register in the IMDS system. In addition, certificates of conformity for the raw materials we supply are obtained from the suppliers; Practical controls are carried out to prevent the use of suspicious parts and their mixing with suitable products.
- In order to ensure sustainability in the supply chain, alternative supplier development activities are carried out and the risks of suppliers are evaluated from multiple perspectives.
- **Responsibility and Application**
- All of our managers and employees are responsible for corporate social responsibility practices throughout our company.
- Employees or business partners of PHI Metal Otomotiv shall inform the official reporting channels that violate this regulation and know their suspected or suspected behaviors.
- PHI Metal Otomotivş prohibits retaliation against any report of a violation.
- In case of violation of our code of ethics, the resolution of disputes shall be carried out by the Disciplinary Board established in accordance with the Company's Disciplinary Procedure.

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