

2025



ODAS'S SUPPLY CHAIN AND COMPLIANCE POLICY



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01 Purpose

With the ODAŞ Supply Chain and Compliance Policy ("Policy"), we at ODAŞ focus on protecting the environment, contributing to increased social benefit, and promoting sustainable development in all regions where we operate. In this regard, we aim to drive positive change not only within our own operations but also throughout our entire value chain. As an integral part of our vision for sustainability, ethics, and compliance, we attach importance to and encourage our suppliers and subcontractors, who are our business partners, to act in line with this approach.

In this context:

- All our suppliers and subcontractors are regularly reviewed for compliance with ODAŞ's Ethical Principles and company policies.
- Sustainability goals are set for our supply chain; and effective solutions are developed for environmental, social, and governance (ESG) risks.
- In the procurement process, sustainability performance is considered a fundamental measure of achievement, along with other criteria such as cost, quality, and occupational health and safety.
- Suppliers and subcontractors with high sustainability performance are prioritized; and their capacity to achieve environmental and social impact is supported.
- Providing that minimum conditions are met, local suppliers and subcontractors are favored; and projects that promote the inclusion of women, youth, and disadvantaged groups are prioritized.
- The sustainability approach of ODAŞ is developed in line with internal and international standards; and national and global best practices are taken into consideration.

The purpose of this Policy is to convey the key principles and values we embrace at ODAŞ to our business partners and to provide guidance on the standards that we expect our partners to adhere to.

02 Scope

ODAŞ's Supply Chain and Compliance Policy;

- Covers ODAŞ employees, and
- Companies from which we receive external services, and individuals and organizations acting and/or providing services on behalf of ODAŞ, including consultants, lawyers, and external auditors.

03 Expectations for Compliance by Suppliers and Subcontractors

In line with its vision of sustainability, ODAŞ requires all its suppliers and subcontractors to act in



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accordance with ethical principles, legal regulations, and human rights. In this regard, we require our business partners to comply with the following principles and rules:

3.1. Compliance with Legal Regulations and Odaş's Ethical Principles

- Acting in accordance with all of ODAŞ's policies, ethics, and rules of conduct.
- ODAŞ and its Affiliates, Suppliers, and/or Business Partners are expected to comply with all laws and regulations applicable to their operations and industries. In this regard, Suppliers and/or Business Partners are required to comply with competition laws, legislation on the prevention of money laundering and financing of terrorism, data privacy regulations, laws on fighting against bribery and corruption, and all other applicable legal provisions.
- They shall comply with the legal regulations in force in all regions where they operate.
- They shall comply with all local and international laws, including those on the protection of competition and the prevention of bribery.
- The supplier acts in compliance with export controls, embargoes, anti-corruption regulations, and customs laws.

3.2. Working Conditions and Human Rights

- Full compliance with applicable labor laws is maintained in terms of working hours, vacation entitlements, wages, and benefits.
- Within the scope of preventing child labor, individuals below the age limit defined in ILO Convention No. 138 on Minimum Age shall not be employed under any circumstances.
- Young workers shall not be assigned to hazardous work and their schooling shall not be impeded.
- Forced or compulsory labor shall not be used under any circumstances.
- Employees shall be paid at least the minimum wage.
- Vacation and leave rights are provided in accordance with the law, and daily and weekly working hours are managed in accordance with the regulations.
- The rights of employees to unionize, organize, and negotiate collective agreements are respected.
- Employees can safely report any ethical violations or illegal conduct they witness without fear of threats or pressure.

3.3. Equality

- Discrimination based on race, ethnicity, language, religion, denomination, gender, gender identity, sexual orientation, age, physical characteristics, place of birth, marital status, pregnancy status, disability, social status, political views, or union membership is not allowed under any circumstances.

3.4. Occupational Health and Safety (OHS)

- ODAŞ undertakes that it shall not establish business relationships with suppliers that do not meet minimum occupational health and safety standards, and that compliance with these standards shall be considered a prerequisite.
- Suppliers are required to present an official compliance statement confirming that they comply with the risks and applicable legal regulations within the scope of occupational health and safety.
- Obligations related to occupational health and safety are clearly stated in supplier contracts. In this regard, matters such as the provision of necessary safety equipment and the compliance of working environment conditions with legal standards are incorporated into the text of the contract.



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- All health and safety measures required in the workplace are taken.
- Employees shall be provided with Occupational Health and Safety (OHS) training.
- Companies providing security services shall not use unlawful force or coercion in any way; and they shall issue the necessary instructions and conduct inspections in this regard.
- Suppliers are required to submit detailed OSH risk assessment reports (including identification of hazards, analysis of risks, and rating scores) for the relevant workplaces to ODAŞ at least once a year.

3.5. Gift

- Gifting in violation of the law is not permitted. Only small promotions that are in line with commercial conventions are acceptable.

3.6. Information Security and Privacy

- Confidential and sensitive information is not allowed to be shared without permission.
- Attention is paid to the protection and security of personal data.

3.7. Environment and Sustainability

- All operations are conducted in compliance with environmental laws.
- Suppliers are encouraged to monitor and manage their environmental impacts, such as the consumption of natural resources, carbon emissions, water and power usage, effects on biodiversity, and waste generation.
- Environmentally-friendly methods are favored from the production to the disposal of products and services.
- Energy and resources are used efficiently.

3.8. Quality and Safety

- Safety and quality standards are observed in products and services.

3.9. Audit

- The supplier shall be open, transparent, and cooperative in any audits that may be conducted by ODAŞ.

04 Monitoring and Reporting of Violations

In order to ensure that suppliers comply with the principles and standards set out in this Policy, ODAŞ monitors and reports violations when deemed necessary.

In cases where non-compliance is observed under this policy, suppliers will be contacted and, if it is technically feasible, a 12-month period for taking action will be granted. Failure to remedy the identified violation within a maximum of 12 months shall result in the reassessment of the business relationship with the supplier and subcontractors and, based on the nature and extent of the risk, the termination of the relationship where deemed necessary, including consideration of the right to terminate the contract. The final decision on the termination of the relationship is made by the managers of the relevant business unit and/or the Company's General Manager.



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In relation to their OHS performance, suppliers are required to submit accident data, training/drill statistics, and non-conformity closure reports to the ODAŞ OHS Team on a quarterly basis. For identified non-conformities, corrective/preventive action plans are drafted in collaboration with the supplier; the implementation and effectiveness of the plan are monitored by Odaş at 6- and 12-month intervals.

ODAŞ provides the support of an OHS consultant to suppliers who wish to improve their OHS performance and, if necessary, carries out joint training/audit projects.

05 Enforcement

ODAŞ's Supply Chain and Compliance Policy has entered into force as of 25.07.2025, pursuant to the Board of Directors' Decision dated 25.07.2025 and numbered 2025/10. The effective date and version information of the policy shall be clearly stated in the document. The policy is published and made available on internal company systems and the corporate website.

ODAŞ's Ethics Committee is responsible for implementing, monitoring, and assessing the effectiveness of the policy. Within this scope, ODAŞ's Ethics Committee identifies risks in the implementation of policies, reviews the received ethics reports, monitors the system's effectiveness regarding violations, and recommends corrective actions when necessary. Recommendations for revisions are drawn up by the ODAŞ Ethics Committee and implemented by the Board of Directors. Updated policy documents are clearly communicated to all employees and relevant stakeholders.

In contradiction between the Turkish and English versions of this document, the Turkish version shall prevail.



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