
	<b>GLOVIS TURKEY SUPPLIER CODE OF CONDUCT</b>	Document Code: GTR.HR/ESG.POL.05
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**GLOVIS TURKEY  
SUPPLIER CODE OF CONDUCT**

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## 1. OBJECTIVE AND SCOPE

### A. Purpose

GLOVIS TURKEY strives to adapt to such rapid paradigm shifts by establishing a sustainable supply chain. As such, we have prepared this Supplier Code of Conduct in order to establish an ethical and sustainable supply chain. The Supplier Code of Conduct requests that our suppliers that provide goods and services to or has otherwise entered into a contract with GLOVIS TURKEY (hereinafter “Suppliers”) comply with the laws and regulations applicable to corporate management (including but not limited to laws and regulations relating to anti-corruption, sanctions, forced labor, safety/health, and fair trade), as well as adopt the best practices concerning ethics, the environment, labor/human rights, safety/health, and business management systems. We hope our Suppliers as well as all participants in the larger supply chain abide by this Supplier Code of Conduct to contribute to the shared growth with GLOVIS TURKEY, and become a socially respected company.

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Our Supplier Code of Conduct is based on Drive Sustainability’s Global Automotive Sustainability Practical Guidance and refers to the Responsible Business Alliance’s Code of Conduct. The Supplier Code of Conduct also takes into account recent global legislative trends addressing human rights and environmental issues in supply chain management, such as the EU Corporate Sustainability Due Diligence Directive, as well as other laws and regulations related to ESG. However, should any recommendations or demands in this Supplier Code of Conduct contradict the laws of the countries in which our Suppliers operate, the laws of the relevant countries shall prevail over the content herein. This Supplier Code of Conduct may be updated and modified in the future to reflect the most current domestic and international industry developments.

## **B. Scope of Application**

All suppliers that provide goods and services to GLOVIS TURKEY, or enter into a contract for any other transactions, shall comply with the Supplier Code of Conduct. All suppliers should recommend other business entities in the supply chain, including upstream suppliers and subcontractors, to comply with the provisions contained within this Code of Conduct.

## **C. Suppliers’ Roles and Responsibilities**


In management decision-making and operational business processes, all suppliers of GLOVIS TURKEY should consider the provisions of this Supplier Code of Conduct. GLOVIS TURKEY, and third party entities commissioned by GLOVIS TURKEY, may verify and inspect, within the scope permitted by the law, whether suppliers are complying with the provisions of the Supplier Code of Conduct. Based on inspection and investigation outcomes, GLOVIS TURKEY may recommend that suppliers respond to any identified risks, and if so, suppliers will establish plans and implement countermeasures to mitigate these risks. Compliance with this Supplier Code of Conduct may be considered as an important criteria in the selection of suppliers, and the lack of meaningful improvement efforts by a supplier in violation of the Supplier Code of Conduct may result in difficulty to continue a working business relation with GLOVIS TURKEY.

This Supplier Code of Conduct is not an exhaustive list of all obligations with which the suppliers should comply, and may be regularly reviewed, supplemented and amended to establish a sustainable supply chain. This Supplier Code of Conduct can be found within the GLOVIS TURKEY website, where readers can make further inquiries if necessary. Furthermore, GLOVIS TURKEY will exert its best efforts to provide appropriate channels (audio, video, text, etc.) and methods (Turkish, English, etc.) to allow for suppliers and their members to easily access information related to the Supplier Code of Conduct in order to ensure that suppliers may sufficiently understand and comply with the Supplier Code of Conduct, and support its suppliers to actively communicate the objectives of this Supplier Code of Conduct with the larger supply chain, such as its upstream suppliers and subcontractors.

## **2. Business Ethics**

### **A. Transparency and Anti-Corruption**

- ① The executives and employees of suppliers should comply with the highest standards of integrity and laws of the country where they conduct business operations.
- ② The executives and employees of suppliers should not engage in bribery, extortion, embezzlement, or graft through abuse of their status, nor gain unfair benefits by taking advantage of weaknesses and deficiencies.

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- ③ Suppliers should establish internal systems to allow for the reporting and investigation of suspicious transactions, and ensure that whistleblowers are not unfairly treated for reporting suspicious activity.
- ④ Suppliers should not demand recruitment fees or other costs relating to brokerage of employment opportunities from employees.

#### **B. Conflicts of Interest**

- ① Suppliers should make responsible decisions based on defined operational rules.
- ② The executives and employees of suppliers should not promise, offer, authorize nor give anything that may lead to the gain of undue or improper benefits. This prohibition covers incurring damage to the company for the benefit of an executive or employee and promising individual benefits through a third party.

#### **C. Fair Trade and Competition**


- ① Suppliers should comply with the relevant anti-corruption laws and standards of the countries where they maintain business operations.
- ② Suppliers should not engage in activities that would disrupt fair competition through the pursuit of unfair transactions, such as abusing their market dominance or trading position.
- ③ Suppliers should make payments to their suppliers in a timely manner and should not arbitrarily change the amount of payment.
- ④ Suppliers should not engage in activities that unfairly restrict competition in the marketplace with regards to the price, supply volume, area and terms of trade of goods or services.
- ⑤ Suppliers should not improperly obtain information from competitors, business partners (subcontractors), or other agencies, nor should they use or disclose information obtained illicitly by the company or third parties.

#### **D. Prevention of Unauthorized Parts**

- ① Suppliers should not manufacture or use unauthorized raw materials or parts, and should not use or sell fabricated raw materials or parts.
- ② Suppliers should conduct regular inspections to ensure that no fabricated raw materials or parts are used or manufactured in their facilities, and should immediately report any such activity to the local governmental authorities or customers.
- ③ Suppliers should exert their best efforts to ensure that raw materials and parts that they have manufactured are being used and distributed according to the relevant business purposes, contractual conditions, etc.

#### **E. Compliance with Export Restrictions/Sanctions**

- ① Suppliers should comply with all applicable laws and regulations and international treaties pertaining to export restrictions and economic sanctions.
- ② Suppliers should not engage in any business transactions with countries, territories, entities, groups, or

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individuals subject to export restrictions or economic sanctions.

- ③ Suppliers should engage in self-inspection to ensure compliance with all applicable laws and regulations and international treaties pertaining to export restrictions and economic sanctions, and should cooperate with GLOVIS TURKEY's due diligence activities to inspect the status of compliance with export restrictions and economic sanctions, as necessary.

#### **F. Information Protection**

- ① Suppliers should not disclose trade secrets and information relating to their clients or business partners (subcontractors) without consent, nor store or use the information they have obtain through performing business duties.
- ② Suppliers should collect and use personal information only within the scope of the original, established purpose and data retention period. Prior consent should be obtained before modifying either the purpose or the retention period.

#### **G. Intellectual Property Protection**

- ① Suppliers should respect the intellectual property rights of their clients and business partners (subcontractors), develop appropriate measures to protect intellectual property rights, and regularly confirm whether intellectual property rights are protected.


#### **H. Responsible Procurement Activities**

- ① Suppliers should establish a process to identify the country and region from which raw materials, parts and components used at any point in their supply chain, directly or indirectly, in the manufacture of items supplied to GLOVIS TURKEY are sourced.
- ② Suppliers should ensure that they do not source raw materials, parts or components for their manufacturing process that are in turn manufactured, at any point in their supply chain, directly or indirectly, with the use of forced labor.
- ③ Suppliers should establish a process to confirm the point of origin and smelters relating to all minerals and raw materials including conflict minerals<sup>1</sup> such as tin, tungsten, tantalum, gold, etc.
- ④ Suppliers should, in line with the above established process, exert their best efforts to inspect<sup>2</sup> whether social/environmental issues such as human rights abuses, unethical behavior, environmental damage, etc. are occurring at the point of origin/smelter from which minerals and other raw materials are sourced.
- ⑤ Suppliers mainly dealing minerals and raw materials in their business activities should exert their best

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<sup>1</sup> The abovementioned four minerals are among the major conflict minerals produced in African conflict zones (10 countries, including the Democratic Republic of Congo), causing international concern due to human rights abuses and child labor in the mining process, and the use of funds from mineral exports to promote civil war and conflict.

<sup>2</sup> Through the new rule adopted by the U.S. Securities and Exchange Commission in 2012, listed companies are required to disclose whether to use conflict minerals in their products. In 2015, the European Parliament required importers of minerals to report the country of origin and issue inspection results of minerals to the competent authorities of each country.

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efforts to independently confirm or seek external certification that minerals and raw materials sourced by them are free from social/environmental issues such as human rights abuses, unethical behavior, environmental damage, etc. in the mining and processing.

### 3. Environment

#### A. Establishment of Environmental Management System

- ① Suppliers should comply with applicable environmental laws and regulations in the countries in which they have business operations, and fully obtain and maintain all environment-related permits and licenses required for their business operations.
- ② Suppliers should establish and operate an Environmental Management System<sup>3</sup>, designed to mitigate the impact of their business operations on the environment, comprised of environmental management organization structures, planning, procedures, and result evaluation, etc.

#### B. Management of Energy Use and Greenhouse Gas Emissions

- ① Suppliers should establish a system with which they can calculate their energy use and greenhouse gas emissions.
- ② Suppliers should exert their best efforts to minimize energy use and greenhouse gas emissions.

#### C. Water Resources Management

- ① Suppliers should establish a system with which they can calculate their water use and wastewater discharge.
- ② Suppliers should exert their best efforts to minimize water use and maximize the treatment of wastewater. Suppliers should manage the level of water contaminants discharged to comply with applicable legal standards or a more rigorous internal standard.


#### D. Air Pollutant Management

- ① Suppliers should establish a system with which they can calculate their air pollutant emissions.
- ② Suppliers should use appropriate methods to minimize the emission of air pollutants. Suppliers should manage the level of air pollutants discharged to comply with applicable legal standards or a more rigorous internal standard.

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<sup>3</sup> For example, ISO14001 standards, etc. (ISO14001 standards are international standards for environmental management systems (EMS) established by the International Organization for Standardization (ISO) to encourage continuous environmental performance and improvement throughout corporate activities. Compliance with ISO14001 standards may be certified by independent external organizations.



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## E. Management of Reusable Resources and Waste

- ① Suppliers should establish a system with which they can calculate their waste disposal.
- ② Suppliers should use appropriate methods to minimize the disposal of waste subject to landfill or incineration. Suppliers should exert their best efforts to increase the reusing and recycling of waste and recover raw materials and parts.
- ③ Suppliers should exert their best efforts to minimize environmentally harmful remnants occurring from landfill or incinerated waste, in consideration of the entire lifespan of their products.

## F. Chemical Substances Management

- ① Suppliers should exert their best efforts to ensure that chemical substances handled in their business operations are safely managed throughout the transportation, storage, use, and disposal processes. Furthermore, suppliers should appropriately label or disclose information needed to identify the potential harms and dangers of chemical substances.
- ② Suppliers should exert their best efforts to identify whether raw materials, parts, etc. that they procure, manufacture, sell, or distribute contain substances harmful to humans or the environment<sup>4</sup>.

## G. Animal Protection


- ① When conducting animal tests as an inevitable procedure in their business operations, suppliers should comply with Article 23 (Principles of Animal Testing) of the Animal Protection Act.
- ② Suppliers should respect the Five Freedoms regarding animal welfare established by the World Organisation for Animal Health:
  - Freedom from hunger or thirst
  - Freedom from discomfort
  - Freedom from pain, injury or disease
  - Freedom to express (most) normal behavior
  - Freedom from fear and distress

## H. Protection of Biodiversity and No Deforestation

- ① Suppliers should exert their best efforts to measure the impact and dependence of their business operations on biodiversity and to establish and execute strategic and implementation plans to prevent, minimize, and offset negative impacts on biodiversity, in order to preserve, restore, and expand biodiversity in the local community.
- ② Suppliers should establish procedures to inspect the potential risks of deforestation due to their business operations in order to protect the local forests and exert their best efforts to prepare a response system to take appropriate measures in the event that actual or potential deforestation is recognized.

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<sup>4</sup> For example, through the EU Restriction of Hazardous Substances Directive (2006).

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## 4. Labor/Human Rights

### A. Prohibition of Child Labor

- ① Suppliers should ban any and all forms of child labor in principle in all of their facilities, unless specifically permitted by applicable law. Suppliers should verify the age of all employees and applicants through legitimate documents such as identification cards and birth certificates, and if instances of child labor is identified, immediately cease such employment and implement appropriate response measures such as improvement and education programs.
- ② If hiring young workers, suppliers should not employ them in high-risk jobs as defined by safety and health standards, and should have appropriate measures in place to ensure educational opportunities.
- ③ Suppliers should not receive goods and services from business partners (subcontractors) that are engaged in child labor or that violate applicable laws, and should take necessary action if such violations are confirmed.

### B. Prohibition of Forced Labor

- ① Suppliers should comply with the labor rules of the countries where they maintain business operations, and prohibit all forms of forced or mandatory labor that is contrary to the free will of the employee. "Forced Labor" shall mean work or service which is exacted from any person under the menace of any penalty for its nonperformance and for which the worker does not offer himself or herself voluntarily, and include convict labor and indentured labor or convict labor and indentured labor applicable under penal sanctions.
- ② Suppliers should ensure that they do not produce for GLOVIS TURKEY, in whole or in part, goods produced by Forced Labor or produced in whole or in part by persons or entities subject to the Forced Labor Regulation or supplied in violation of Forced Labor Regulation. "Forced Labor Regulation" includes any law, regulation, decree, ordinance, rule or requirement imposed, administered or enforced from time to time by the United Nations, the United States (including, but not limited to, the U.S. Customs and Boarder Protection), the European Union, the United Kingdom, the Republic of Korea or other relevant governmental or international authorities relating to the prevention of Forced Labor (including, but not limited to, the prohibition against the importation of goods made wholly or in part with Forced Labor).
- ③ Suppliers will conduct risk-based due diligence on their supply chains, which involves mapping the supplier's supply chains and identify regions, suppliers, and other factors that pose the most risk related to Forced Labor to ensure that the supply chain is free from the use of Forced Labor. This due diligence will be regularly updated.
- ④ Suppliers will establish a Code of Conduct that articulates a position against the use of Forced Labor within any step within its supply chain. In establishing the Code of Conduct, each suppliers will implement related procedures to identify the country and region for all raw materials, parts and components used at any point in its supply chain, where such raw materials, parts and components are directly or indirectly used in the manufacture of items supplied to HMC. This Code of Conduct and related procedures will also be designed to ensure that the supplier does not source raw materials, parts or components for its manufacturing process that are in turn manufactured, at any point in its supply chain, directly or indirectly, by using Forced Labor.
- ⑤ Suppliers will provide periodic training on the Code of Conduct and the prohibition of Forced Labor to their

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employees and to their first tier suppliers.


- ⑥ Suppliers will maintain and implement a remediation plan, in the event Forced Labor is identified in its supply chains, and shall promptly provide information about the circumstances of such use of Forced Labor and its remediation to GLOVIS TURKEY.
- ⑦ Suppliers will also require its suppliers to adopt an equivalent Code of Conduct and related procedures, and confirm through auditing or monitoring that its suppliers adhere to their respective Code of Conduct and associated procedures.
- ⑧ Suppliers should not, for the purpose of restricting employees' personal activities, require employees to submit their identification cards or visas, nor should they engage in activities such as assault, intimidation, or confinement for the purpose of Forced Labor.
- ⑨ Suppliers should not receive goods or services from businesses that either restrict the mental and physical freedom of employees or that engage in Forced Labor, and should require their suppliers to obtain the same commitment from their subcontractors.
- ⑩ In the event that a Supplier learns that any supplier (subcontractor) in its supply chain has used Forced Labor in the manufacture of any items sold (directly, or incorporated into items sold directly or indirectly to) GLOVIS TURKEY, it shall immediately discontinue the use of that supplier and inform GLOVIS TURKEY.

#### **C. Non-Discrimination and No Harassment**

- ① Suppliers should not engage in any form of discrimination based on gender, race, ethnicity, nationality, religion, disability, age, marital and family status, social identity and political affiliation in hiring and employment practices such as recruitment, promotion, training, etc.
- ② Suppliers should not engage in any form of discrimination in providing wages and workers' benefits.
- ③ Suppliers should not include requirements that are not relevant to the job description when recruiting and hiring.
- ④ Suppliers should establish policies and procedures to ensure that no human rights violations including sexual harassment, mental or physical coercion, verbal violence, etc. occur, and may refer to the GLOVIS TURKEY Charter for Human Rights, GLOVIS TURKEY Ethics Charter and Code of Conduct, and this GLOVIS TURKEY Supplier Code of Conduct in the process.

#### **D. Wages and Benefits**

- ① Suppliers should compensate workers in accordance with the applicable laws and regulations of the countries where they maintain business operations. Compensation should be paid in a timely manner according to schedule, and workers should be provided with a clear wage statement in a language that the workers can understand.
- ② Suppliers should ensure pleasant working conditions and strive to provide all employees with benefits to improve quality of life.
- ③ Suppliers should provide mandatory training in accordance with the laws and regulations of the countries where they maintain business operations. Moreover, they should strive to help all employees build their careers and strengthen their capabilities.

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## E. Working Hours

- ① Suppliers should comply with all applicable laws, in relation to legally defined working and resting hours, of the countries where they maintain business operations.
- ② Suppliers should ensure that any hours worked beyond normal work hours are voluntary, and provide lawful compensation for overtime if employees work overtime under unavoidable circumstances.
- ③ Suppliers should ensure that all employees receive on average at least one day off every week.

## F. Humane Treatment

- ① Suppliers should respect the privacy of all employees and refrain from assigning unnecessary overtime tasks.
- ② Suppliers should notify employees in advance and obtain voluntary agreement when collecting their personal information.
- ③ Suppliers should prohibit workplace harassment, which includes any act that may cause physical or mental distress, or that aggravates the working environment for other employees beyond the normal scope of their work. Appropriate changes and measures should be implemented to reduce such harassment, such as disciplinary measures against offending workers and changing workplaces or placements upon request.

## G. Freedom of Association

- ① Suppliers should respect the right of employees to associate and bargain collectively, and allow them to form and manage lawful bargaining bodies.
- ② Suppliers should engage, with sincerity, in collective bargaining negotiations with the representatives of employees.
- ③ Suppliers should allow individual employees to freely recommend negotiation terms if their representatives are absent.


## H. Ethical Recruitment

- ① Unless specifically permitted by applicable laws and regulations, suppliers should not store, dispose of, conceal, forfeit or otherwise restrict employees' access to their personal documents (such as identification cards, passports, driver's licenses, etc.).
- ② Suppliers should not demand any kind of fees or payment whatsoever in exchange for employment.
- ③ Suppliers should provide written documents or verbal explanations in a language that each employee understands regarding the working conditions to all employees.

## 5. Health and Safety

### A. Establishment of Health and Safety Management System

- ① Suppliers should comply with applicable workplace health and safety laws and regulations in the countries in which they have business operations, and fully obtain and maintain all health and safety-related permits and licenses required for their business operations.

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- ② Suppliers should establish and operate a Health and Safety Management System<sup>5</sup>, designed to prevent workplace hazards and accidents, comprised of health and safety management organization structures, planning, procedures, and result evaluation, etc.

#### **B. Safety Management of Machinery, Equipment, and Facilities**

- ① Suppliers should regularly inspect and evaluate the safety level of potentially harmful or dangerous machinery, equipment, and facilities in the workplace.
- ② Suppliers should install and manage safety devices, barriers, and emergency devices to prevent safety accidents caused by the use of harmful or dangerous machinery, equipment, and facilities in the workplace.
- ③ Suppliers should provide appropriate safety protection equipment for the protection of workers. The safety protection equipment should be available for easy and convenient use by employees and well maintained and managed to perform as expected.

#### **C. Emergency Preparedness**

- ① Suppliers should have an established plan to respond to emergencies, including natural disasters, cluster infections, fire and other occupational accidents. Moreover, guidelines should be in place that stipulate the reporting process, response procedures, and follow-up in case of emergency.
- ② Suppliers should implement worker training and emergency drills in accordance with their own plans or guidelines, or the laws of the countries where they maintain business operations.
- ③ Suppliers should have adequate exit routes and signs, fire detection and warning equipment, and fire prevention facilities in case of emergency, and ensure that the above all function properly.

#### **D. Accident Management**


- ① Suppliers should have programs to measure industrial accidents and illness.
- ② Suppliers should immediately cease operations if an industrial accident or severe disease outbreak occurs, and take necessary countermeasures including the evacuation of employees.
- ③ Suppliers should investigate the causes of industrial accidents or illness and endeavor to provide relevant improvement plans to reduce their incidence.

#### **E. Safety Evaluation**

- ① Suppliers should regularly conduct safety risk evaluations to ensure that employees are not exposed to accident risk and harmful factors. Evaluation results should be communicated to employees and machinery,

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<sup>5</sup> For example, ISO45001, KOSHA18001 standards, etc. (Health and safety management systems are designed to gradually improve the health and safety system of a workplace through planning, implementation, inspection and evaluation based on health and safety principles voluntarily established by the business operator. ISO45001 is a standard established by the International Organization for Standardization (ISO), and KOSHA18001 is a Korean standard developed by the Korea Occupational Safety and Health Agency.

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equipment, and facilities should be improved according to the evaluation results.

- ② Suppliers should provide employees with information on accident risk and harmful factors in the workplace based on safety risk evaluation results. The information should be written in a language that employees can understand, and should be displayed in an easily accessible place.
- ③ Suppliers should not require pregnant women and young people to conduct tasks involving high safety and health risks, and should strive to create a working environment so that other vulnerable employees such as the disabled and migrant workers do not have difficulties in their work.

#### **F. Health Management**

- ① Suppliers may provide employees with resting areas, toilet facilities and dining areas, and should strive to maintain hygiene and cleanliness in such facilities if they are provided.
- ② Suppliers may provide employees with boarding facilities, which should be equipped with safety signs, lighting and heating and cooling systems. Moreover, employee boarding facilities should have appropriate facilities to limit access by unauthorized personnel.
- ③ Suppliers should provide general or special medical examinations in compliance with relevant laws and regulations on employee health applicable in the countries where they have business operations. Moreover, based on the results of employees' medical examinations, suppliers should implement necessary measures such as change in working areas or tasks, shortened working hours, etc.

#### **G. Health and Safety of Contractors**

- ① Suppliers should ensure that the health and safety of contractors are appropriately managed while contractors provide services to the benefit of suppliers.


### **6. Management Systems**

#### **A. Company Statement Disclosure**

- ① Suppliers should disclose this Supplier Code of Conduct, or their commitment to fulfilling sustainable business practices, internally and externally.
- ② Suppliers should share this Supplier Code of Conduct, or their commitment to fulfilling sustainable business practices, through internal channels, such as the New Year's address by executives, internal guidelines, or the in-house bulletin board. Moreover, they are recommended to disclose them via websites, management reports and publications.

#### **B. Appointment of Social and Environmental Sustainability Management**

- ① Suppliers should appoint a supervisor who is responsible for corporate social and environmental sustainability activities.
- ② Suppliers should appoint a person who manages the planning and implementation of corporate social and environmental sustainability activities (social responsibility activities).

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### C. Risk Assessment

- ① Suppliers should endeavor to identify ethical, environmental, labor/human rights, safety/health risks associated with their business operations.
- ② Suppliers should develop and implement measures to mitigate risks if significant risks are discovered.

### D. Training and Communication

- ① Suppliers should train their employees in the provisions of this Supplier Code of Conduct, as well as the matters governed by the relevant laws and policies.
- ② Suppliers should share implementation plans and progress concerning the matters governed by this Supplier Code of Conduct.

### E. Information Management

- ① Suppliers should accurately record and manage information concerning ethical, environmental, labor/human rights, and safety/health risks.
- ② Suppliers should strive to disclose information in a transparent matter when local laws, industrial associations and important clients with contractual obligations request such information, unless the disclosure is prohibited by law.

### F. Grievance Mechanisms for Advice and Concerns about Ethics


- ① Suppliers should operate a grievance mechanism allowing employees who confirm or identify violations of ethics, environmental, labor/human rights, safety/health laws and regulations to seek advice and raise concerns. These mechanisms should allow employees to report infringements of their individual rights or interests.
- ② Suppliers should protect employees who report ethical concerns against unfair treatment such as layoffs, threats, retaliation, and mockery. Employees who report such concerns should have their identity protected.

### G. Methods for Remedy

- ① If suppliers' business operations result in negative impact on the sustainability of the supply chain, suppliers should provide appropriate methods for remedy to victims, considering the extent of damages and importance of relief.
- ② Suppliers should strive to establish methods of remedy in accordance with international standards, and in determining remedy methods, should engage in consultation with the affected victims and their representatives.

### H. Management of Business Partners (Subcontractors)

- ① Suppliers should recommend that their business partners (subcontractors) and other participants in the supply chain engage in management of ethical, environmental, labor/human rights, and safety/health factors in planning, designing, selling and manufacturing goods and services.
- ② Suppliers should strive to recommend that their business partners (subcontractors) and other participants

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in the supply chain improve violations or risks concerning ethical, environmental, labor/human rights, and safety/health laws and provisions when they identify such violations or recognize such risks.

#### **I. Compliance of Supplier Code of Conduct**

- ① As permitted by relevant laws and regulations, suppliers should provide evidence of compliance with this Supplier Code of Conduct during regular written assessments or on-site visits carried out by GLOVIS TURKEY or designated third parties.
- ② Suppliers should prepare and manage appropriate documents<sup>6</sup> to prove their compliance with this Supplier Code of Conduct. Such documents should be based on facts and reflect business operations.
- ③ Suppliers should strive to establish and implement plans to promptly address deficiencies and violations of compliance with this Supplier Code of Conduct, as identified by written assessments or on-site visits.

#### **7. Supply Chain Due Diligence**

- ① Ensuring compliance with relevant laws and regulations, suppliers should identify and evaluate risks to sustainability in their supply chain and monitor how such risks are brought mitigated and handled.
- ② Suppliers should establish supply chain due diligence procedures in accordance with the six-step procedure presented in the OECD Due Diligence Guidance for Responsible Business Conduct.
  - Embed responsible business conduct into policies and management systems
  - Identify and assess actual and potential adverse impacts associated with the enterprise's operations, products or services
  - Cease, prevent and mitigate adverse impacts
  - Track implementation and results
  - Communicate how impacts are addressed
  - Provide for or cooperate in remediation when appropriate

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<sup>6</sup> Appropriate documents may include workplace safety and health management rules prepared under Article 225 of the Occupational Safety and Health Act, industrial accident and disease occurrence records prepared under Article 10 of the Occupational Safety and Health Act, employment rules prepared under Article 93 of the Labor Standards Act, a wages register prepared under Article 48 of the Labor Standards Act, etc. and other materials relevant to the requirements of this Code of Conduct or that may provide supporting evidence in the assessment of compliance status, such as consent to compliance with the Ethics Charter, emergency manual, working hours log, work environment measurement results, etc.