

Cevahir Deri Policy – Principles and Code of Business Conduct

 **We act lawfully and with fairness**

We regard legal and ethical principles as elementary criteria for our actions
We operate with fairness

 **We walk together side by side**

Our employees are our most important asset
We ensure the satisfaction of our customers
We involve our suppliers and trading partners as well as public administrations

 **We respect human dignity**

We respect the rights of assembly, coalition and collective bargaining
We reject forced labor, human trafficking and any restrictions on freedom of movement
We reject child labor unconditionally

 **We create fair and safe working conditions**

We provide appropriate working hours, holidays and remuneration
We are committed to safeguarding jobs and offering equal opportunities
We unconditionally reject discrimination and harassment
We ensure health protection, occupational safety, fire protection and emergency preparedness.

 **We ensure requirements are met**

We guarantee quality, product safety, comfort and profitability
We ensure the protection of resources, environmental compatibility and energy efficiency.
We protect the data and information of our business partners, employees and our own company know-how.

 **We want to continuously improve in all areas**

We regard continuous improvement as an impulse for our actions
We design our processes according to the criteria and principles of the Cevahir Deri Operating System
We consistently apply our integrated management system

04-Jan 2021, Your management

Yönetim Kurulu Başkanı



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Arda Cevahircioğlu



CEVAHIR DERI Policy Presentation

Preamble and scope

The CEVAHIR DERI develops, produces and sells leather, punchings and seat covers for the automotive industry worldwide, with the goal of operating economically and sustainably. This policy is to be understood as the framework within which, we as a company, operate in society. For the entire CEVAHIR DERI, it defines our requirements in terms of quality, environmental protection and energy efficiency in addition to principles and behavioral codes of conduct regarding legality and ethical, civil and social principles, including health protection and occupational safety.

Our commitment towards people, society and the environment resulted in our signing the Global Compact Principles of the United Nations. We are committed to human rights protection, fair labor practices, protecting the environment and anti-corruption practices as well as to sustainable development goals. In addition to the requirements of our interested parties such as owners, employees, customers, etc., our policy takes into account the internationally recognized requirements of the 1988 ILO United Nations Declaration on Fundamental Principles and Rights at Work, the 2011 United Nations Guiding Principles on Business and Human Rights and the 2003 OHCHR International Bill of Human Rights. The CEVAHIR policy is a guideline for all employees (hereinafter referred to as employees)

irrespective of what (management) level and is available to all interested parties on the Intranet and Internet. It is explained in more detail below.



We act lawfully and with fairness

We regard legal and ethical principles as elementary criteria for our actions

Compliance with national and local legal obligations, regulations and other requirements within the framework of all operational processes and at all operational levels, is a matter of course for us. We also expect this compliance from our business partners.

We operate with fairness

We reject all forms of corruption, extortion and bribery. Compliance with fair business and competition standards as well as antitrust law is important to us. When dealing with business partners, state institutions and employees, the interests of the company and private employees, on both sides, are to be strictly separated. Decisions are to be made free from considerations unrelated to the subject matter and personal interests. Invitations, gifts and benefits that may influence business decisions and orders cannot be accepted, requested or granted. We respect intellectual property and reject plagiarism.

We guarantee data protection and information security
We handle data sensitively and guarantee the confidentiality of all data or information exchanged with our customers, business partners, employees, colleagues and contacts.



We walk together side by side

Our employees are our most important asset
Only by working together can we achieve quality assurance and continuous quality improvement, environmental compatibility and sustainability of our products as well as the conservation of energy and resources. Within the scope of his/her duties, every employee is obliged to fulfil all process requirements regarding quality, environment, energy, information security, occupational safety and health protection. We promote awareness of legal issues, ethical, civil and social principles as well as our requirements for quality, environmental protection, energy efficiency, information security, health protection and occupational safety, through consultation, information, training and participation of our employees based on their tasks and duties.

We ensure the satisfaction of our customers
Customer satisfaction is our highest priority. We do

everything we possibly can to meet the demands of our customers regarding quality, comfort, being compatible with the environment, information security, being energy efficient, protecting health and complying with occupational safety standards. Establishing and maintaining long-term relationships is particularly important to us.

We involve our suppliers and trading partners as well as public administrations

We maintain long-standing and valuable business relationships with our suppliers and trading partners. We are committed to accountable supply chains, the development of sustainability and management system standards as well as important issues such as adherence to animal welfare rights, up to our raw hide suppliers and product safety. We expect the same level of commitment from our suppliers' subcontractors. Furthermore, we maintain contact with local public administrations and provide information on inquiries quickly and competently.

 We respect human dignity

We respect the rights of assembly, coalition and collective bargaining

CEVAHIR DERI is interested in constructive, collaborative co-operation and exchange on a regular basis with the employee representatives, CEVAHIR DERI respects its employees' right of assembly, right of association and the

right to collective bargaining within the framework of the applicable legal regulations.

We reject forced labor, human trafficking and any restrictions on freedom of movement

All our employees work for us on a voluntary basis. They have the freedom to terminate their employment after giving reasonable notice. We do not retain any part of an employee's property or documents.

We reject child labor unconditionally

Considering the ILO regulations and the applicable national labor laws, we comply with the statutory minimum age for employment without restrictions.

 We create fair and safe working conditions

We provide appropriate working hours, holidays and remuneration

Every employee is entitled to working hours and holidays that are always at least in line with local legal requirements and that partly exceed them. As far as possible and in accordance with operational requirements, flex-time is granted in alignment with the cultural customs of a country. Working on Sundays and public holidays only happens in exceptional circumstances. The wage level at the individual locations is based on the respective regional average, not on the lower limit, and minimum standards are adhered to or exceeded, where defined. Depending on local conditions, we pay our employees for additional and atypical working hours.

We are committed to safeguarding jobs and offering equal opportunities

We deploy our employees according to our operational requirements, general conditions and their personal aptitude. We promote equal opportunities and family-friendly conditions. Hire and Fire is not an option for us. At all our plants, we require and promote internal and external training and further education of employees within the framework of targeted talent management. Our global presence gives employees the opportunity to work internationally.

We unconditionally reject discrimination and harassment

The diversity of our employees is the cornerstone of our strength. We pursue and penalize discriminatory statements or actions between employees when hiring or during employment – whether for cultural, ethnic, religious or other reasons – with all internal and legal means available to us.

We ensure health protection, occupational safety, fire protection and emergency preparedness

We understand protecting the workplace to be a managerial task. We are committed to providing adequate, safe and healthy working conditions, providing tested personal protective equipment and designing workplaces ergonomically, preventing work-related injuries and illnesses, eliminating hazards and to minimizing safety and health risks. With our accident and incident management, we avoid accidents and incidents of any kind and solve any

problems sustainably. In addition, the machine safety at the workstations is assessed at an early stage and continuously and, if necessary, special safety measures are derived taking into account legal requirements. Fire protection and emergency preparedness is extremely important to us and a matter of course. Together with local authorities or service providers, we ensure that all processes function in accordance with legal requirements in the event of a hazard.

 We ensure requirements are met

We guarantee quality, product safety, comfort and profitability

We are constantly committed to meeting our customers' demands for system and process quality, guaranteeing the health and safety of our customers and end customers, as well as their demands for the comfort, cost-effectiveness and long service life of our products. In our ISO17025 accredited laboratories, test procedures are updated and modified according to requirements.

We ensure the protection of resources, environmental compatibility and energy efficiency

We buy products that are resource and energy efficient, including renewable energies. Through the economical use of water, energy and other raw materials, guaranteeing the safety of chemical input materials and the use of environmentally friendly pro-

cesses and techniques, the protection of biodiversity and high ecological compatibility are achieved in order to ensure good air and water quality with low consumption. We avoid waste through the sustainable, resource

We protect the data and information of our business partners, employees and our own company know-how
 Data protection and information security make a significant contribution to the trusting cooperation with our business partners and employees. Comprehensive organizational and technical security measures, as well as the sensitization of our employees, ensure the confidentiality, integrity and availability of data and information from our customers, our employees and our company. We evaluate risks, derive measures from them and analyze information security and data protection incidents systematically. This is how we avoid the risk of incidents occurring or repeating themselves.

 We want to continuously improve in all areas

We regard continuous improvement as an impulse for our actions

We are striving to constantly improve our products, processes, production sites and organization and take specific measures to continuously improve quality, information security, environmental and energy-related performance and health and safety at work. We

use advanced technologies to develop ecologically and energy efficient processes that are even more efficient and safe. In order to avoid mistakes, risks and find the root causes of problems, we consistently implement corrective, preventive and improvement measures. Goals are systematically defined and pursued

We design our processes according to the criteria and principles of the Bader Operating System

To achieve operational excellence for our customers, we have defined mutually agreed to criteria, principles and best practices for process improvement – our Bader Operating System. With the participation of all Bader employees and all locations worldwide, we promote result-oriented best practice solutions for standardization and continue to develop ourselves further.

We consistently apply our integrated management system

We apply our process-oriented integrated management system to ensure that the various requirements are met and to ensure continuous improvement in all phases of product planning, manufacture and application. We maintain certified management systems at the individual sites (see <http://bader-leather.com/zertifikate>).

What employees can do if necessary

Employees who identify legal violations or violations of these principles and codes of conduct, as well as risks and vulnerabilities that could lead to violations, can report them to the Complaints Office, their supervisors or employee representatives. We investigate concerns raised, take appropriate action and provide feedback if we know the employee filing the report. Employees have the opportunity of maintaining anonymity by reporting through their representative. In any case, we will not discriminate against any employee that files a report, disclose their names and information to a third party or involve them further in investigations.

Possible consequences of legal violations and infringements

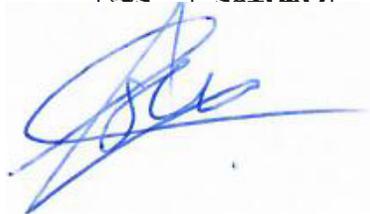
CEVAHIR pursues a zero-tolerance policy and does not tolerate violations of the law or of these principles or the codes of conduct, by employees. Culpable action on the part of an employee can result in consequences under labor laws – up to and including termination of employment. Damage caused by violations may result in personal liability on the part of the employee. Courts and authorities may impose penalties or fines. If a concern raised turns out to be a false report and proven to be intentional, it will be treated with all the possible consequences as described above.

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