



## **ETHICAL COMPLIANCE PRINCIPLES**

### **1- RESPONSIBILITIES TO COMPETITORS**

**1.1.** Nuh Group Companies; competes with rival sector companies on the basis of ethical principles, within the framework of Competition Law Rules and respect.

**1.2.** Respects the patents, copyrights and intellectual property of competing industry companies. It refrains from price fixing and all other monopolistic activities that create unfair competition. Fights against business and transactions aimed at limiting competition.

**1.3.** Employees may collect, share and use information about competing companies that is publicly available and available in the market. However, it is ensured that these are only done with a legal and ethical understanding. Information gathering activities through prohibited methods (entering private property, eavesdropping on conversations, wiretapping, hacking, invasion of privacy, bribery, false declaration, coercion, espionage or threat) or violation of confidentiality agreements are against the law and ethical rules. attempts are blocked. The company also applies the privacy policy it applies to its own non-public information within the scope of information obtained from rival companies.

**1.3.** As in the Competition Law Rules in force in our country, it competes in compliance with the laws of all countries in which it operates and on an ethical basis, with respect to rival sector companies.

### **2- WHISTLEBLOWER PROTECTION**

**2.1.** Including, but not limited to, unlawful behavior by employees (Financial corruption or impropriety or fraud, non-compliance with legal obligations or applicable laws, Human Rights violations - including health and safety and child labor hazards - serious damage to the environment, criminal activities, improper treatment, etc.) other activities) or business ethics non-compliance is detected, it is encouraged to notify the company via the e-mail address etik@nuhcimento.com.tr created within the scope of Ethical Compliance.

**2.2.** The notification made by the employees can only be accessed by the Human Resources Manager and it is decided whether or not it will be subject to ethical review. If deemed



necessary during the evaluation phase, the opinions of the Human Resources Director, Chairman of the Board of Directors, CEO and other senior executives may be sought. The results of the Ethics Review are evaluated by the Ethics Committee, which consists of the “CEO, HR Director, HR Manager and the relevant unit Director”.

**2.3.** Employees who report violations of laws and ethical rules in good faith and raise their concerns are encouraged by the Company to keep their identities confidential. The reporting employee is prevented from facing any retaliation (any act of adverse employment, including discrimination, demoting, dismissal, forfeiture, threats or harassment).

**2.4 .** The company will protect any employee who honestly raises a concern, but knowingly making a false accusation, lying to investigators, or refusing to cooperate is a violation of the code of ethics. Reporting honestly does not mean that the employee must be right; It is sufficient to simply believe that the information given is correct.

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## Nuh Çimento Group Human Rights Policy

### 1. Purpose and Scope

Nuh Cement Group operates in different geographies with its efficiency and sustainability-oriented approach. It adopts an understanding that respects human rights for its employees and all stakeholders with whom it has business relations in the countries in which it operates, and aims to observe basic human rights throughout the society. Nuh Çimento Group's Human Rights Policy has been established in accordance with the United Nations Global Compact.

1.1 The Universal Declaration of Human Rights and International Labor Organization (ILO) Conventions, United Nations Global Compact, United Nations Business and Human Rights Principles, OECD's Guidelines for Multinational Enterprises form the basis of the policy .

1.2 The policy covers primarily employees, business partners, and suppliers. Nuh Çimento Group conveys the rules specified in the Policy to its employees in annual trainings. In order to encourage its employees as well as its business partners and suppliers to act in accordance with the principles in this Policy , it informs the Policy and includes it in the contracts.

### 2. Principle, Commitment and Related Practices

Within the scope of the policy, Nuh Cement Group;

#### *2.1 Respect for Human Rights*

In accordance with the Universal Declaration of Human Rights, it respects universal human rights in the countries where it operates and aims to prevent human rights violations. In addition, it respects the rights of indigenous peoples in the countries of operation by referring to the United Nations Declaration of the Rights of Indigenous Peoples .

#### *2.2 Equal Opportunity, Respecting Differences and Diversity*

Gender, language, religion, race, ethnicity, sexual orientation, nationality, age, pregnancy, marital status, union membership, political opinion and similar issues among employees in human resources processes such as remuneration, recruitment, personal and professional development, and in the business environment. It has an equal attitude without making any discrimination depending on the issue and does not tolerate discrimination in these matters. While executing its approach towards employees with the principle of right person for the right job, it manages processes transparently depending on the qualifications, experience and



performance of the employees. It respects diversity, which is an important element of organizational structure.

### *2.3 Collective Bargaining Right and Freedom of Association*

Respects employees' right to collective bargaining and freedom of association.

### *2.4 Freedom of Expression*

It adopts the principle of preventing any situation that may hinder employees' right to freedom of expression in the business environment.

### *2.5 Healthy and Safe Working*

It considers providing the conditions and work environment where they can work safely and happily to all its employees among its priorities and acts in line with the goal of "zero accident" in all its activities. Oversees full compliance with international principles and national laws and regulations regarding OHS; is committed to providing good practices beyond legal obligations.

### *2.6 Prevention of Abuse*

It does not tolerate incidents such as ill-treatment, intimidation and harassment in the business environment.

### *2.7 Forced Labor and Human Trafficking*

It strictly prohibits forced labor and human trafficking.

### *2.8 Child Labor*

It prohibits child labor in line with the principle of not employing child labor as set forth in the Declaration of Fundamental Labor Principles and Rights of the International Labor Organization.

### *2.9 Criminal Acts*

It does not take any initiatives that may result in a crime or violation of rights in the countries where it operates. In this regard, it expects employees to show sensitivity in the same direction.



### *2.10 Stakeholder Feedback*

It gives importance to the feedback and opinions of the stakeholders about the policy. Policy-related feedbacks and possible policy violations and non-compliances are reported via [etik@nuhcimento.com.tr](mailto:etik@nuhcimento.com.tr).

## **3. Compliance, Monitoring, Audit and Reporting**

3.1 Responsibility for human rights policy rests with the CEO and Board Members at the highest level.

3.2 The Board of Directors of the Company is responsible for the oversight of the determination and operation of notification, review and sanction mechanisms in case of non-compliance with the human rights policy, rules and regulations.

3.3 Nuh Cement Group identifies the possible human rights problems that may arise in its activities and the groups that will be most affected by these problems and tries to reduce and prevent these effects in case of a negative impact on human rights. If human rights are at risk, necessary measures are taken by contacting the authorities.

3.4 In order to report violations of compliance with the Policy, a system has been established in which the identity of the whistleblower will be kept confidential.

3.5 The policy is reviewed by the Ethics Committee every two years and the implementation of the policy is followed up. In case of feedback from stakeholders, the Board quickly takes action and reviews the Policy.

## **4. Resolution of Policy Non-Compliances**

4.1 Within the scope of the policy, formal and informal complaint mechanisms are developed in order to compensate for the rights violations committed by Nuh Çimento Group.

4.2 If the Ethics Committee deems necessary, it may seek expert opinion and benefit from experts by taking measures that will not violate the principles of confidentiality during the investigation. All information and documents requested by the Ethics Committee during the investigation are given to the committee. All employees are obliged to assist the Ethics Committee in this regard.



No retaliation is made against any employee who raises concerns within the scope of the policy, and notifications are handled through processes that protect confidentiality. Failure to comply with the Policy may result in disciplinary or criminal action.

  
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## DIVERSITY and INCLUSION POLICY

### 1. PURPOSE

Nuh Cement Industry Inc. The diversity and inclusion policy for the company aims to create an environment that will help the company to have a positive attitude towards employees of different cultures, ethnic groups, and genders and to combine distinctive features in the workplace. This policy respects the cultural, religious, and gender differences of the company's employees based on equal treatment, respect, fairness, and equal opportunity. In the implementation of this policy, the institution aims to increase the understanding between different cultures by providing training and awareness programs to its employees. In addition, it aims to benefit from these differences and increase the work performance of the team by creating teams and projects where employees from different ethnic groups work together.

Diversity and Inclusion Policy; Nuh Cement Industry Inc.'s commitment to diversity and inclusion in its workforce. This policy; Nuh Cement Industry Inc. It is in line with our ethical principles that apply to employees and all business partners in its own company and affiliated companies.

### 2. DEFINITIONS

**Diversity:** It is defined as the acceptance of all differences, regardless of culture, race, gender, religion, or language, that enriches a workplace.

**Inclusiveness:** It means that the existence of all people in an organization is accepted, respected, and included without any discrimination.

**Equality:** All employees in the organization have equal rights and opportunities to achieve their goals and achieve success.

### 3. SCOPE

This policy is implemented by Nuh Çimento Sanayi A.Ş. It is valid for all institutions and organizations (“Business Partners”) with which the company has business relations, including its subsidiaries, suppliers, and dealers.

### 4. RESPONSIBILITIES

Nuh Çimento Sanayi A.Ş. Management, Human Resources Director, Group Managers, and Department Directors are responsible.



## 5. POLICY

Variation: It means the acceptance and representation of different cultures, genders, ages, ethnicities, and abilities within the organization. The diversity strategy creates a broader customer and employee base along with diversity, creating advantages for the business. Thus, by gaining more different ideas, perspectives, and skills, innovation and competitive advantage are provided for the business. Inclusiveness includes the participation and contribution of society, as well as all employees, to business processes.

Nuh Cement Industry Inc. management includes employees in decision-making processes by valuing their ideas and feedback. The inclusion strategy enables employees to feel more commitment, motivation, and loyalty to the organization. Diversity and inclusion strategies, Nuh Çimento Sanayi A.Ş. It is applied in every field from company management to environmental management. Nuh Çimento Sanayi A.Ş., recruitment strategy; It adopts an approach that includes candidates from different ethnic groups and genders. Candidates' qualifications and abilities are evaluated according to their suitability for the job. Nuh Çimento Sanayi A.Ş. creates a business culture that respects the company's diversity and supports diversity by adopting the diversity and inclusion strategy to its stakeholders (customers, suppliers, shareholders).

## 6. APPLICATIONS

### *1. Equal Opportunity in Employment*

Nuh Çimento Sanayi A.Ş. believes that the principle of diversity is vital for success and is determined to eliminate prejudice in recruitment processes. When evaluating candidates, an equal evaluation is made regardless of their gender, ethnicity, age, or any other characteristics. Candidates from under-represented groups such as women and people with disabilities are prioritized and employment opportunities are created. Recruitment professionals are supported with training programs to eliminate unconscious bias in recruitment processes.

Nuh Çimento Sanayi A.Ş. is especially involved in projects that support women's employment to enable women to take an active part in business life. It actively supports all work carried out within the scope of these projects.

- Staff: Our overall target for female employees by 2030 is 27%.

### *2. Training and Development*

Nuh Cement Industry Inc.' Education and development activities have an important place in promoting diversity and inclusion. Nuh Cement Industry Inc. to all employees; It offers training and development opportunities to adopt, explain and embed the principles of diversity and inclusion into the corporate culture.





It also implements targeted training programs so that managers and supervisors can effectively manage various groups. These training programs are Covers unconscious bias, effective communication, and conflict management.

### **3. Wages and Benefits**

Nuh Çimento Sanayi A.Ş. adopts the principle of equal pay for equal work with its wage and fringe benefits strategies and practices. A balance is achieved between the wages paid by considering the features such as the importance, difficulty, and responsibility of the job.

Wage policies are constantly monitored and controlled to ensure the sustainability of the equal pay application.

### **4. Inclusive Policies and Practices**

Nuh Çimento Sanayi A.Ş. reviews and updates its policies and practices, thus creating an inclusive culture that does not discriminate against any employee group. Nuh Çimento Sanayi A.Ş. believes that inclusive policies and practices are the basic principles in creating an environment where all employees feel valued and supported. It works with all its might to eliminate prejudice in its policies and practices.

Nuh Çimento Sanayi A.Ş. believes that this policy will help create a workplace that is inclusive of all diversity. Nuh Çimento Sanayi A.Ş. is determined to implement all necessary initiatives to promote diversity and inclusion and make improvements to be better through continuous evaluations.

## **7. RESOLVING POLICY NON-COMPLIANCE**

Nuh Cement Industry Inc.' In addition, every situation and suspicion that is contrary to ethical values and principles, policies and procedures, or legal regulations are reported to the Ethics Behavior Board within the scope of the reporting policy.

Forwarding Notifications Email:

Address:

Information about the Ethics Committee and whistleblowing processes, as the training provided, are announced to the employees and to all stakeholders by means of internal announcement systems (e-mail, posters, etc.) and published on the website.





## **NUH ÇİMENTO INDUSTRY INC. BOARD DIVERSITY POLICY**

### **1. PURPOSE**

This Policy, Nuh Çimento Sanayi A.Ş. The adequate structure of the Board of Directors determines the principles and criteria regarding the suitability and diversity of its members. Accordingly, the nomination process for the membership of the Board of Directors is managed in a way that emphasizes the principles of diversity and inclusion. The policy identifies the elements and objectives of the Board structure, including diversity, to be considered to ensure the proper functioning of the Board of Directors and to ensure its effective functioning.

### **2. SCOPE**

This Board of Directors Diversity Policy ("Policy") sets forth the basic principles within the scope of diversity in Nuh Çimento's Board of Directors.

### **3. POLICY**

In the process of nominating candidates for the Board of Directors Age, gender, race, nationality, nationality, disability, ethnicity, age, gender, race, nationality, nationality, disability, ethnicity, age, gender, race, nationality, who have the necessary knowledge, experience and competence required by the task, in line with the company culture, size and activities, in a way that will enable them to make decisions independently and in good faith, and who have the qualifications to protect the interests of all stakeholders It is aimed to ensure the diversity of origin.

In this context, in the nomination process of the Board of Directors, priority is given to female candidates among candidates with the same qualifications in terms of knowledge, experience and competence, and as a principle, it is aimed that the rate of female members in Nuh Çimento Board of Directors will reach 25% within 5 years.

The nomination and member selection process for the Nuh Çimento Board of Directors is carried out in accordance with the relevant regulations, primarily the Turkish Commercial Code and the Capital Markets Law, and the provisions of the company's articles of association.



It creates an environment within the Board of Directors where the opinions of the executives are listened to, their ideas are considered important and prejudice, discrimination and all kinds of negative factors are not tolerated. Renewal and election processes for the Board of Directors to have an adequate and balanced structure; Nuh Çimento always encourages the diversity of its members according to their needs. All our stakeholders are encouraged to implement this policy.

The Nomination Committee, which works on the establishment of a transparent system for the identification and evaluation of suitable candidates for the Board of Directors, and the determination of policies and strategies in this regard, also consider the diversity criteria in this policy in accordance with its duties and working principles and evaluates whether the candidates meet the relevant criteria.

A blue handwritten signature is written over the Nuh Cemento Sarayı A.Ş. logo. The logo consists of the word "nuh" in a bold, blue, lowercase sans-serif font, with "çimento sarayı a.ş." in a smaller, blue, lowercase sans-serif font to its right. The signature is a fluid, cursive script in blue ink.



## CRISIS MANAGEMENT SYSTEM

In the face of adverse emergencies that may interrupt business processes and production, studies are carried out to be prepared, to survive with less damage and to continue our services without interruption. The studies are carried out in accordance with the application principles specified in the ISO 22301 Business Continuity Management Standard, within the scope of law and legislation obligations. A backup plan is implemented in line with the detection of situations that will cause disruption in corporate workflows and action plans to be taken.

Nuh Çimento has a succession plan.

Determining the interventions against the negativities that may occur in every field is among our priorities, and it is aimed to make them functional immediately and as soon as possible.

Protecting the life safety of our employees, ensuring the safety of the facilities, environmental aspects, monitoring economic developments, raw material supply, meeting customer expectations and corporate image are among our priorities in the works to be carried out in times of emergency and crisis.

In order to ensure the continuity of business continuity in our company with the plans we have prepared for adverse situations, the priorities we have determined, we ensure their continuity by providing our interventions and strategies with the following items.

- To protect our employees and primarily to ensure life safety.
- Identifying emergencies and critical areas in the field.
- Identifying emergency custodians and their backups.
- To assess the environmental and OHS risk of critical facilities and work areas in the field, to keep them up to date.
- Establishing emergency response teams, keeping them up to date with training and exercises
- Identify affected processes, components, and assets based on risk scenarios.
- Activating processes and operations as quickly as possible
- Having a crisis fund for emergencies or finding alternative sources of liquidity
- Maintaining relationships with insurance companies
- Keeping the services of connecting remotely and with technology tools active from outside the company
- Managing internal and external communication, including communication with the media
- Managing risks that will harm brand value and company reputation.
- Managing stakeholder relations

In response to crises that occur in emergencies, ensuring the sustainability of business continuity and the interests of our employees, subcontractors, and customers are taken into consideration. Business continuity is ensured by the creation and implementation of the backup plan at all levels. It is determined and managed in



accordance with the backup criteria and other HR processes of the plan, together with the positions that are backed up. We undertake to comply with the conditions in the integrated management systems of our company, to constantly review and implement them effectively, and to integrate them with business processes and other management systems.

  
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## FREEDOM OF ASSOCIATION POLICY

### 1. PURPOSE

Nuh Çimento Industry Inc. is determined to create an ethical workplace in terms of both how it treats its employees and how our employees treat our customers. Our Ethics Policy includes collaborative values such as democracy, responsibility, equality, fairness and solidarity. Nuh Cement Industry Inc. In partnership with organizations in the movement, we believe in ethical values such as honesty, openness, social responsibility, and a commitment to respect the human rights and dignity of everyone.

Nuh Çimento Industry Inc. recognizes the right of its employees to Freedom of Association and Assembly. The aim is to create an ethical workplace, maintain communication and dialogue, and ensure that all our colleagues are treated fairly and equally in principle and practice. In doing so, we ensure compliance with laws that guarantee freedom of association and the right to bargain collectively.

### 2. POLICY

In doing so, we ensure compliance with the law providing:

#### **Article 23 of the Universal Declaration of Human Rights:**

"Everyone has the right to form and join trade unions to protect their own interests."

#### **Article 51 of the Turkish Constitution:**

"Employees and employers have the right to establish unions and higher organizations, to join freely and to withdraw from membership without prior permission, in order to protect and develop the economic and social rights and interests of their members in their business relations.

#### **Trade Unions and Collective Bargaining Law No. 6356 Article 25 Recruitment**

Workers; Being a member of a certain union, continuing or leaving a certain union cannot be made conditional on being a member of any union. The provisions of the collective bargaining agreement and the employment agreement that are inconsistent with the above provisions are invalid.



The employer cannot make any distinction between workers who are members of a union and workers who are not members of a union or who are members of a separate union in terms of working conditions or termination of employment. The provisions of the collective bargaining agreement are reserved for social benefits related to wages, bonuses, premiums and money.

Workers cannot be dismissed or subjected to different treatment because they are members of a trade union or not, participate in the activities of workers' organizations outside of working hours or with the employer's permission, or engage in union activities.

### **ILO Convention No. 87 on Freedom of Association and Protection of the Right to Organize,**

#### **Article 2:**

Employees and employers have the right to establish organizations of their choice without prior permission, without any discrimination, and to become members of these organizations only if they comply with their statutes.

#### **Article 3:**

1. Workers' and employers' organizations have the right to draw up their statutes and internal regulations, freely elect their representatives, organize their management and activities, and determine their work programmes.

2. Public authorities should refrain from any interference that would limit this right or prevent it from being exercised in accordance with the law.

#### **Article 10:**

In this Agreement, the term "organization" means any organization consisting of employees and employers whose purpose is to serve and defend the interests of employees or employers.

#### **Article 11:**

Every member of the International Labor Organization, about which this Convention is in force, is obliged to take all necessary and appropriate measures to ensure that workers and employers can freely exercise their right to organize."



As can be understood from the expression “No discrimination in the recognition of the right to unionize” in the ILO conventions, which covers

Employees, servants, servants, etc. It does not limit it to some of the dependent employees who are mentioned with qualifications such as. This right is given to all workers and employers.

### **European Social Charter (European Covenant of Social Rights)**

Article 5- Right of association Contracting Parties shall not violate this.

Freedom of national legislation to establish, establish or become a member of local, national and international organizations to protect the economic and social interests of workers and employers. undertakes to prevent harmful application. The extent to which the guarantees envisaged in this article will be applied to the security forces shall be determined by national laws or regulations.

Article 6 - Right to collective bargaining

In order to ensure the effective use of the right of collective bargaining, the Contracting Parties,

1. Developing joint negotiations between workers and employers;
2. When necessary and appropriate; developing a method of free negotiation with employers' organizations in order to regulate working conditions through collective bargaining;
3. They undertake to promote the establishment and operation of a system of appropriate conciliation and discretionary arbitration for the resolution of labor disputes.

TURKISH CRIMINAL LAW NUMBER 5237, IN ACTION SINCE 16.09.2004

### **Violation of freedom of work and employment**

ARTICLE 117-

(1) A person who violates the freedom to work and work by using force or threat or other unlawful acts is punished with imprisonment from six months to two years or with a judicial sentence, upon the complaint of the victim.

(2) A person who, by exploiting his helplessness, desolation and loyalty, employs a person or persons for free or for a fee that is clearly disproportionate to the service he provides, or who





subjects the person in this situation to working and accommodation conditions incompatible with human dignity, from six months to three years. or a judicial fine not less than one hundred days.

(3) The same penalty shall be imposed on the person who supplies or transports a person from one place to another in order to put a person in the situations mentioned in the above paragraph.

(4) A person who, by using force or threat, forces the worker or employer to reduce or increase wages or accept agreements under conditions other than those previously accepted, or causes a job to be stopped, terminated or continued, is sentenced to imprisonment from six months to three years.

### **Preventing the use of trade union rights**

ARTICLE 118. –

(1) Any person who uses force or threat against a person to force him to become a member of a union or not to participate in the activities of a union, to force him to leave the union or his position in the management of the union, is sentenced to imprisonment from six months to two years.

(2) In cases where the activities of a trade union are hindered by use of force, threat or any other unlawful act, a prison sentence of one to three years is imposed.

THESE PENALTY CANNOT BE CONVERTED TO FINES, CANNOT BE DEFERRED

### **Common Provision**

ARTICLE 119. –

(1) Crimes of preventing education and training, preventing the activities of public institutions or professional organizations in the nature of public institutions, preventing the use of political rights, preventing the use of freedom of belief, thought and conviction, violation of the immunity of residence and violation of freedom of work and work;

a) With a weapon,

b) By unsigned letter or special signs, by making the person unrecognizable,

c) by more than one person together,



d) By making use of the frightening power created by existing or presumed criminal organizations,

e) By abusing the influence provided by the public office,

If committed, the penalty to be imposed is increased by one fold.

### **Saving Personal Data**

ARTICLE 135. -

(1) Anyone who unlawfully records personal data is sentenced to imprisonment from six months to three years.

(2) Political, philosophical or religious views of individuals, their racial origins; A person who illegally records information about his moral tendencies, sexual life, health status or union connections as personal data shall be punished in accordance with the provisions of the above paragraph.

### **Unlawfully Giving Or Obtaining Data**

ARTICLE 136. -

(1) A person who unlawfully gives, disseminates or captures personal data to another person is sentenced to imprisonment from one year to four years.

### **Qualified Cases**

ARTICLE 137. -

(1) The offenses defined in the above articles;

a) By a public official and by misuse of his/her duty,

b) By taking advantage of the convenience provided by a certain profession and art,

If committed, the penalty to be imposed is increased by half.



## **Torture**

ARTICLE 94. -

(1) Any public official who commits acts that are incompatible with human dignity and that will cause him to suffer bodily or spiritually, affect his perception or will power, and humiliate him, is sentenced to imprisonment from three years to twelve years.

## **Grind**

ARTICLE 96. -

(1) A person who commits acts that will cause a person to suffer is sentenced to imprisonment from two to five years.

ARTICLE 232. -

(2) A person who abuses his disciplinary authority arising from his right of upbringing over a person under his administration or whom he is responsible for raising, teaching, caring for, maintaining or teaching a profession or art, is sentenced to imprisonment of up to one year.

## **3. APPLICATION**

As Nuh Çimento Group, our company supports the formation of unions and in this context, ÇEİS, T.ÇİMSE-İŞ Union Group is subject to collective bargaining agreements.



# NUH ÇİMENTO GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

## VISION

The Anti-Corruption and Bribery Policy primarily aims to comply with national legislation and the international legislation referred to in this document, basic regulations, principles, recommendations and criteria, which are examples of good practice published by international organizations.

## PURPOSE

The purpose of the Anti-Corruption and Bribery Policy is to ensure compliance with the anti-bribery and anti-corruption laws and regulations, ethical principles and universal rules applicable in all countries in which our Company operates, as well as to ensure compliance with the obligations regarding the prevention of financial crimes, to ensure that our customers, transactions, products and services are managed on a risk-based basis. approach, and to raise awareness of all our employees on these issues by determining our strategies to reduce possible risks, our relevant controls and measures, our operating rules and responsibilities.

This policy also aims to prevent the placement and laundering of the proceeds of crime, the source of which is bribery and corruption crimes, to eliminate and determine as much as possible the environment that may pave the way for bribery and corruption crimes between company employees-customers/business partners and aims to fulfill its commitments.

Company statement; covers the entire Nuh Çimento Group.

## Promotions

**Corruption:** It is the misuse of existing resources and powers in any institution for personal purposes, directly or indirectly, for profit.

**Bribery:** It is the benefit of a person within the framework of an agreement with a third party to act contrary to the requirements of his duty by means of doing or not doing a job, speeding it up or slowing it down. Bribery and corruption can take place in many different ways, including:

- cash payments,
- Donations to political parties and charities,
- commissions received,



- Social rights that are used unequally and contrary to internal regulations,
- Present,
- Hospitality activities,
- Other interests

countable.

**Anti-Corruption and Bribery** : It was established within the scope of our company and business partnerships, to act as a control mechanism against the direct or indirect abuse of existing resources and powers for personal purposes and to prevent possible risks.

**Third Party** : Shareholders, affiliates, group companies, existing and potential; business partners, suppliers, partners are natural and legal persons within the scope of support service.

#### **SCOPE**

This policy applies to the members of the Board of Directors, the General Manager, Senior Managers and all company employees, our subsidiaries and affiliates and their employees, companies from which we receive outsourcing services, including legal support services, and their employees, suppliers, consultants, lawyers, external auditors. It includes individuals and organizations working on behalf of the company, including our customers, as well as our customers.

#### **Focus Areas in Corruption and Bribery**

Within the scope of this policy, business units are the main focus areas in order to comply with the policy and to continue the flows in a harmonious manner;

- Accepting and presenting gifts,
- Representation and hospitality activities,
- Facilitation Payments,
- Donations (Political and Charitable Contributions)
- abuse of office,
- Relations with third parties and business partners,



- Relations with Legal Authorities,
- Actions required within the scope of sponsorship relations

they should.

**Acceptance and presentation of gifts ;** These are the products and services that do not require any material or moral return between the existing business relationship and potential business expectations, and are provided for the purpose of commercial courtesy or thanks.

**Representation and hospitality activities;** are invitations, entertainment, meals, corporate communication organizations and training activities carried out for the purpose of representation and entertainment among persons in business or potential business relations.

**facilitation payments;** An informal, improper, small amount of payment made to a low-level official to secure or expedite the execution of a routine or necessary action to which the facilitating payer is legally entitled. Such irregular payments are tracked through notifications made to the Ethics Line.

**donation payments;** political contributions and charitable contributions. Political contributions or activities on behalf of the company are prohibited. In donations to charities, our Company requires compliance with the principles in the Ethical Principles Policy. Processes related to donation payments are carried out together with the opinions requested by the relevant business unit and are followed up as a result of notifications made to the ethics line.

**abuse of office;** means the use of the powers held in the decision-making process by obtaining special benefits. Such irregularities are followed through notifications made to the Ethics Line.

**Relations with third parties and business partners;** Shareholders, affiliates, group companies, existing and potential; Business partners, suppliers, partners, natural and legal persons within the scope of support service are considered as third parties under this policy. In the activities of our company with third parties, researches are carried out together with the opinions requested by the relevant business unit and are followed up as a result of the notifications made to the ethics line.

**Relations with Legal Authorities;** The gifts and treats that will be given directly or indirectly to the civil servants in the foreign or local legal authorities with whom our company is in contact due to legal regulations are limited to gifts of symbolic and non-material value.



**Sponsorship relationships;** It can be in the fields of sports, arts, culture, education, entrepreneurship and science or in the form of supporting an activity or organization. In the sponsorship processes of our company, researches are carried out together with the opinions requested by the relevant business unit and are followed up as a result of the notifications made to the ethics line.

It is absolutely unacceptable to take or give bribes, regardless of their purpose. These principles are also sought for third parties receiving or providing services, as well as business partners. Activities with third parties, which are all stakeholders other than employees of our company; should be maintained in a fair, transparent, honest, legal and ethical manner. It is strictly prohibited to make or receive improper payments or misconduct, directly or indirectly, against third parties, legal authorities, business partners and other parties with whom we have business relations, both internally and externally.

## **Matters to be Considered in the Scope of Anti-Corruption and Bribery Activities**

### **Accurate Record Keeping**

All substantiating documents emerging within the scope of focus areas should be submitted appropriately, records should be recorded completely, accurately and reliably, and relevant records should be kept ready for inspections and inspections by official institutions.

### **Reporting and Data Protection**

An employee acting on behalf of the company should report to the Ethics Line when he suspects corruption within the company or in a party with the company, when he is offered a bribe, asked to pay a bribe, or engaged in any illegal activity.

### **Policy Violation**

In case of violation of this policy, sanctions are applied in accordance with the provisions of the Business Ethics Rules Procedure.

If the violation of this policy is confirmed by examining the organizations from which foreign services are received and within the scope of business partnerships, the business relationship with the specified organizations is terminated as a result of the investigations.

### **Educational Activities**

Trainings are an important tool to increase the awareness of the employees. The trainings to be provided cover all employees of our company.



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# NUH ÇİMENTO INDUSTRY INC. PROFIT DISTRIBUTION POLICY

## 1. PURPOSE

This Policy, Turkish Commercial Code, Capital Markets Board (CMB) Corporate Governance Communiqué, Dividend Communiqué No. II-19.1 and other CMB Legislation, Tax Legislation, and other relevant legislation provisions and our Articles of Association “26. Abdominal Taksim” and “27. The “Dividend Policy” of Nuh Çimento A.Ş. (“Company”) has been determined as follows, within the framework of the provisions of the “Dividend and Dividend Advance Distribution” articles. The purpose of the dividend distribution policy is to ensure that a balanced and consistent policy is followed between the interests of the investors and the company in accordance with the relevant legislation, to inform the investors, and to maintain a transparent policy towards the investors in terms of dividend distribution.

The Company's Dividend Distribution Policy has been prepared in accordance with the CMB's Corporate Governance Communiqué (II-17.1), Dividend Communiqué (II-19.1), and Dividend Advance Distribution; It is announced to all stakeholders, especially the shareholders, via the Company website.

## 2. SCOPE

This Dividend Distribution Policy (“Policy”) sets forth the basic principles within the scope of dividend distribution of Nuh Çimento.

## 3. AUTHORITY and RESPONSIBILITY

The Dividend Distribution Policy was created by the Board of Directors within the framework of the Corporate Governance Principles and submitted to the approval of the shareholders as a separate item on the agenda of the Company's general assembly meeting. The Board of Directors is under the authority and responsibility of monitoring, monitoring, developing, and updating the Company's Profit Distribution Policy.

## 4. Profit Distribution Principles

The date and manner of giving the annual profit to the shareholders is decided by the General Assembly upon the proposal of the Board of Directors, in line with the Capital Markets Law and the relevant regulations of the Capital Markets Board.



Considering the company's growth targets, profitability status, and fund needs required by fixed assets and working capital investments; The basic principle is to distribute profits at the minimum rate determined by the Capital Markets Board within the framework of the Turkish Commercial Code, Tax Procedure Law, Capital Markets Law, resolutions of the Capital Markets Board and similar legislation as well as the relevant provisions of the company's articles of association.

Investments that require a significant outflow of funds to increase the value of the company, important issues affecting the financial structure, significant uncertainties, and adverse events.

Occurring in the economy, markets, or other areas beyond the control of the Company are considered in making profit distribution decisions.

Unless the reserves required to be set aside in accordance with the Turkish Commercial Code and the profit share determined for the shareholders in the articles of association are reserved; It cannot be decided to allocate other reserves or to transfer profits to the next year.

profit distribution or the decision of the board of directors regarding the distribution of the dividend advances are announced to the public within the scope of the regulations regarding the dividend distribution table or the dividend advance distribution table.

In accordance with the Capital Markets Legislation, Capital Markets Board Regulations, and Decisions, the upper limit of the aid and donations to be made by the Company within an accounting period is determined by the General Assembly.

## **5. DIVIDEND DISTRIBUTION PRINCIPLES**

Dividend distribution principles are regulated in Article 26 of the Company's Articles of Association titled "Dividend Distribution" and Article 27 titled "Dividend and Dividend Advance Distribution".

As stated in these articles,

### ***TITLE OF THE PROFIT***

***Article 26 – The general expenses of the company and the amounts that must be paid and set aside by the company such as miscellaneous depreciation, the taxes that must be paid by the company's Legal Entity, the net profit remaining after deducting from the income determined at the end of the accounting year and seen in the annual balance sheet, if any, of the previous year's losses. are separated and distributed with the proposal of the Board of Directors and the decision of the General Assembly, respectively, as follows.***



a) 5% legal reserves are set aside. (TTK466/1)

b) From the remainder, the first dividend is set aside and distributed at the rates and amounts determined by the Capital Markets Board.

c) From the net profit, without prejudice to the first dividend at the rates and amounts determined by the Capital Markets Board:

From the remaining profit after 5% legal reserves; The sum of 10% of the company's paid-in capital and 50% of the remaining after 10%, from the 1st dividend in item (b):

1 – If it is less, the I. dividend in clause (b) is sufficient, and II. dividend is inseparable.

2 – If it is very, the difference (cb) difference II. as dividends and distributed together with and in addition to the I. dividend.

d) 5% of the remaining profit is set aside as a donation to the Nuh Cement Industry Foundation, of which our company is the founder, to be paid in the form and time determined by the Board of Directors.

e) Remaining profit can be partially or completely left on the balance sheet as profit at the end of the period, added to legal or discretionary reserves, or distributed to shareholders.

The provision of article 466/3 of the Turkish Commercial Code is reserved and applied.

f) One tenth of the amount found after deducting the dividend at the rate of 5% of the paid-in capital from the portion decided to be distributed to the shareholders and other persons participating in the profit, is the second legal reserve in accordance with the 2nd paragraph of the 2nd paragraph of the Turkish Commercial Code. as separated.

g) Reserves required to be set aside by law and other reserves, unless the first dividend determined for the shareholders in the articles of association is set aside, profit is transferred to the next year, and unless the first dividend is paid, members of the board of directors, civil servants, employees, and workers, holders of founding dividend shares, privileged shareholders, are used for various purposes. It cannot be decided to distribute dividends from the profits to established foundations and similar persons/institutions.

#### **DIVIDEND AND DIVIDEND ADVANCE DISTRIBUTION:**

**Article 27** – The date and manner of giving the annual profit to the shareholders is decided by the General Assembly upon the proposal of the Board of Directors, in line with the Capital Market Law and the relevant regulations of the Capital Markets Board.

The General Assembly may decide to distribute advance dividends to the shareholders within the framework of the Turkish Commercial Code, the Capital Markets Board regulations, and the relevant legislation. The provisions of the capital market legislation shall be complied with in the calculation and distribution of the advance dividend amount.



## FOR NUH ÇİMENTO GROUP MEMBERS OF THE BOARD OF DIRECTORS AND SENIOR EXECUTIVES WAGE SETTING POLICY

This document: It has been prepared with the aim of defining the remuneration policies of Nuh Çimento Group Board members and senior executives within the framework of the Capital Markets Board regulations.

The main objectives of our wage policy are Remuneration by emphasizing the concepts of job size, performance, contribution to the job, knowledge/skills and competencies, motivating employees by ensuring the wage balance within and between companies and competitiveness in the market, increasing employee loyalty and bringing in a workforce with the appropriate competence to achieve our company's goals.

Within the framework of this main objective, remuneration policies are implemented by considering the improvement of the added value and sustainability values provided to the company in the fields of environmental, social, and governance.

### **1. Remuneration Principles of the Members of the Board of Directors:**

**1.1 Independent Members:** The fees to be paid to the independent members are determined at the General Assembly each year. These fees are determined at a level that does not affect the independence of the members. No performance-based wages or bonuses are paid to independent members.

**1.2 Other Members:** Salaries to be paid to other members of the Board of Directors are also determined at the General Assembly each year. Non-independent members are not paid performance-based wages or bonuses.

**2. Remuneration Principles of Senior Executives:** The Nuh Çimento Group Board of Directors plays a role in determining the remuneration policies of senior executives, supervising, and implementing the policies.

The remuneration principles determined by the Board of Directors are as follows.

Senior executive remuneration consists of three basic elements. The first of these is the monthly base fee, the second is the additional benefits provided are vehicle, fuel, technology package (computer, tablet, phone, line), and health insurance. The base salary is determined by considering the salaries of the same-level managers in similar companies in the sector in which the company operates and the general remuneration policy of the company. Base fees are



generally subject to revision once a year, effective from the beginning of the year. However, base wage revisions (adjustment/adjustment) may be made twice a year, with the decision of the Board of Directors, depending on the change trends in the general price level.

Base salary payments are calculated over 12 wages and 4 bonus accounts, as a total of 16 salaries per year.

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## PURCHASING POLICY

### 1. PURPOSE

This document has been prepared in order to convey the expectations of business partners by explaining the main policies regarding the procurement activities in order to ensure that the sustainability practices adopted within the scope of procurement activities and the transactions to be carried out in NUH ÇİMENTO GROUP Companies can be carried out in accordance with the provisions of the legislation and company policies.

### 2. SCOPE

NUH ÇİMENTO GROUP Purchasing Policy is valid for NUH ÇİMENTO GROUP companies and employees. The Policies and Procedures in the annex are designed to determine the methods to be followed in the end-to-end procurement process of NUH ÇİMENTO GROUP Companies (from the formation of the demand to the termination of the contract by ensuring the fulfillment of the obligations under the contract, including the transmission of the purchase order to third parties) and only in the execution of internal works and transactions. is applied. This Policy does not bind NUH ÇİMENTO GROUP Companies against third parties in any way and does not create any right, interest or authority in favor of third parties. In relations with suppliers, the provisions of the contract, order document and specification are essential.

With this policy, NUH ÇİMENTO GROUP aims to determine the current performance, development areas, risks related to these issues and the necessary action issues of the companies in the supply portfolio in the fields of environment, social, ethics, governance and human rights.

### 3. RESPONSIBLE

NUH ÇİMENTO GROUP Purchasing Directorate is responsible for the preparation and revision of this procedure due to possible changes in current condition.

### 4. DEFINITIONS, ABBREVIATIONS, and ETHICAL PRINCIPLES

**Diversity:** It is defined as the acceptance of all differences, regardless of culture, race, gender, religion, language, that enriches a workplace.

**Inclusiveness:** It means that the existence of all people in an organization is accepted, respected and included without any discrimination.

**Equality:** All employees in the organization have equal rights and opportunities to achieve their goals and achieve success.

**Temporary Guarantee:** The guarantee to be provided temporarily from the companies from which bids were received during the purchasing process, when necessary.

**Performance Guarantee:** Guarantee received from the Supplier/Suppliers with whom the contract will be made after the purchasing process



**SAP:** ERP (Enterprise Resource Planning) System used by NUH ÇİMENTO GROUP Companies

**Purchasing Unit:** NUH ÇİMENTO GROUP Purchasing Directorate units

**Purchasing Request:** All kinds of services and products required by NUH ÇİMENTO GROUP business units to be provided by suppliers

**Order:** Written document or e-mail informing the Supplier of the service or product to be received from the Suppliers

**Contract:** Written agreement between the Company and the Supplier

**Demand Unit:** NUH ÇİMENTO GROUP business units requesting service and product purchases.

**Supplier:** Natural or legal persons providing products/services

**Offer:** Administrative, technical, and financial documents submitted to the Company by the Suppliers in the purchase and sale transactions  
**Technical / Special Specification:** Documents/documents containing the general, special, technical principles and procedures of the products or services to **be purchased**

**NUH ÇİMENTO GROUP:** NUH Çimento Group Companies

**NUH ÇİMENTO GROUP Procurement:** NUH ÇİMENTO GROUP Purchasing Directorate

**End-to-End Procurement Process:** It includes demand management, supplier/source identification, contract management, purchase-payment (P2P) management, and supplier management.

**United Nations Global Compact 10 Principles:** The UN Global Compact's 10 Principles address the fundamental responsibilities of business in the areas of human rights, labor standards, environment, and anti-corruption. By incorporating the 10 Principles into their strategies, policies, and procedures, companies not only uphold their core responsibility for people and the planet but also lay the groundwork for long-term success. The 10 Principles of the UN Global Compact are based on the universally accepted United Nations declarations on the subject.

**United Nations Universal Declaration of Human Rights:** The Declaration, which is a turning point in the history of Human Rights, was prepared by representatives from all regions of the world with different legal and cultural backgrounds. Declared by the UN General Assembly in Paris on 10 December 1948 as a common measure of success for all peoples and all nations, it is the first document to emphasize the universal protection of fundamental Human Rights.



**United Nations Guiding Principles on Business and Human Rights:** These are the guidelines that explain the current obligations of States and business enterprises to respect, protect and ensure the realization of human rights and fundamental freedoms.

**Sustainable Development Goals (SDGs):** A universal call to action to eradicate poverty, protect the planet, and ensure that all people live in peace and prosperity. These 17 Goals build on the achievements of the Millennium Development Goals; on the other hand, it includes new areas such as climate change, economic inequality, innovation, sustainable consumption, peace and justice, among other priorities. The goals are interrelated;

## 5 . NUH ÇİMENTO GROUP PURCHASING MISSION AND VISION

### **Mission:**

- Determining and implementing purchasing strategies that will contribute to the group goals,
- As a reliable and expert business partner, helping demanding departments achieve their business goals,
- Carrying out supplier relations in a sustainable and effective manner by developing the group ecosystem,

### **Vision:**

- Being one of the top 3 purchasing and supplier management teams in the sector
- To be a procurement and supplier management unit with a proactive approach with its employees at the highest level of expertise, using the best practices at the sectoral level
- Contributing to Group strategies as one of the core business functions within the group organization

## 6. General Principles

Purchasing activities of NUH ÇİMENTO GROUP companies are in accordance with the provisions of this NUH ÇİMENTO GROUP Purchasing Policy (hereinafter referred to as the "Policy"), which is in compliance with the legislation and group policies and procedures. is executed.

Considering the principle of separation of duties; Purchasing Units and other units perform their procurement duties within their responsibilities in accordance with company policies and this Policy.

- Considering that the legal entities of NUH ÇİMENTO GROUP Companies are separate and independent, the principles regarding this Policy are fulfilled within the scope of carrying out the purchasing function from a single source and providing operational convenience.





- It is essential for NUH ÇİMENTO GROUP Companies to centralize demands, improve demand management and implement a strategic purchasing approach, with the exceptions defined in the procedures.
- The end-to-end procurement process in NUH ÇİMENTO GROUP Companies is under the responsibility of the Purchasing Directorate.
- Exceptional cases and purchases that are not under the responsibility of the Purchasing Directorate are specified in the procedures and principles to be published under this Policy.
- Except for the exceptions stated in the previous article, the purchases to be made on behalf of the NUH ÇİMENTO GROUP Companies, all kinds of price negotiations and negotiations are under the responsibility of the Purchasing Directorate.
- Resource determination strategy and purchasing decision are determined by the Purchasing Unit in coordination with the Demand Units and the purchasing decision is approved in accordance with the authorization limits of NUH ÇİMENTO GROUP Companies.
- All kinds of communication with suppliers, including but not limited to RFI (information request), RFP (request for quotation), RFQ (request for quotation), negotiation, notification of the purchasing decision, sending orders, and contract processes are under the responsibility of the Purchasing Directorate.
- It is essential to act with medium and long-term planning and to establish a transparent procurement process in all its dimensions in order to carry out purchasing transactions in accordance with the Company's strategies.
- Relevant Demand Units and Purchasing Units will inform each other in a timely manner with a proactive approach and fulfill their responsibilities completely, so that purchases can be made in accordance with the needs, with the required quality, in a short time and with minimum cost.
- Contracts are signed with suppliers when necessary in order to minimize financial, commercial, and legal risks in transactions that will put NUH ÇİMENTO GROUP Companies under commitment.
- Purchasing sourcing processes are managed by the Purchasing Unit, in coordination with the relevant Demand Units and internal customers, in line with the business strategies of NUH ÇİMENTO GROUP.
- Purchasing Units aim to create added value in line with NUH ÇİMENTO GROUP business strategies. In this context, Purchasing Units apply principles such as service/product standardization, long-term demand management, and supplier management.
- Purchasing Units aim to supply the needs at the appropriate time with the awareness of sectoral competition, periodically measure the service level periods (SLA) determined with internal customers in order to improve the purchasing performance. It is the responsibility of the Purchasing Directorate to prepare and update this Policy, and to act in accordance with this Policy. It is the responsibility of the ÇİMENTO GROUP employees. This Policy is interpreted and applied together with other

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policies created by NUH ÇİMENTO GROUP Companies.

## **Human Rights**

Nuh Çimento Group oversees full compliance with national and international norms regulating human rights, especially the United Nations Declaration of Human Rights, and implements the necessary practices within the scope of its activity cycle. Nuh Çimento Group's Human Rights Policy, Equality, Diversity and Inclusion Policy contains all the details on the subject. In this context;

- **Forced and child labor:** It strictly prohibits forced labor and human trafficking. It prohibits child labor in line with the principle of not employing child labor as set forth in the Declaration of Fundamental Labor Principles and Rights of the International Labor Organization. We expect our suppliers not to employ children and young workers in accordance with the legislation of the country they are located in. Suppliers must not engage in forced labor in the form of human trafficking or modern slavery.
- **Prevention of Harassment and Violence:** It does not tolerate incidents such as ill-treatment, intimidation and harassment in the workplace. Suppliers do not allow any form of harassment and take necessary precautions. There is no tolerance for any violation of the immunity of its employees through corporal punishment or physical, sexual, psychological, emotional and verbal abuse.
- **Freedom of Association and Collective Bargaining:** Suppliers respect their employees' right to unionize and their decision to become a union member, their right to organize and collective bargaining in accordance with the law.
- **Compliance with Labor Laws (Wage and working hours):** Suppliers pay their employees equal to or above the minimum specified in applicable laws and regulations, including wages and overtime. It is also obliged to work in accordance with the Labor Law and relevant legislation.

## **Occupational Health and Safety**

Nuh Çimento's expectations from its suppliers regarding Occupational Health and Safety (OHS) are as follows;

- Comply with legal regulations and requirements set by Nuh Çimento,
- Determining the organization, roles, and responsibilities and sharing them with their employees,
- To make or have risk assessments, to prevent possible work accidents and occupational diseases by taking the necessary precautions,
- Ensuring that controls, measurements, examinations and research are carried out to identify risks,
- Providing resources, tools and equipment for the studies, periodic maintenance and control,
- Creating safe and healthy working environments for employees, trainees, visitors and special risk groups and ensuring that they are under health surveillance,
- Have the necessary measurements, tests and analyzes done in the working environment,



- Increasing OHS awareness by training and informing employees in accordance with the legislation,
- Receiving the opinions and suggestions of the employees and supporting their participation,
- Continually carry out emergency preparedness and response activities,
- It is to monitor and audit whether OHS measures are complied with and to ensure that non-compliances are corrected.

### **Environmental Regulations and Protection**

- Being aware of its social responsibility to protect the environment, Nuh Çimento expects its suppliers to establish environmental management systems, undertake continuous improvement, and protect the environment in order to increase their environmental performance in accordance with national and international legal regulations and regulations, in the light of sustainability development and circular economy principles. In this process, Nuh Çimento expects them to be a partner in the commitment in line with the principles of sustainability and combating the climate crisis, taking the Environmental Policy as a reference. As part of this commitment, all Nuh Çimento Suppliers must, without limitation:
- Ensure efficient use of natural resources in the process and use alternative resources when necessary,
- Manage the processes in line with the circular economy approach,
- It should ensure that the environmental dimensions and effects are prevented at the source in the processes,
- Identify environmental risks and opportunities by integrating the environmental management system into business processes and strategies, and take measures to minimize environmental risks,
- Consider the principles of transition to a low-carbon economy in their investments and machine-equipment selections,
- Taking into account the risks and opportunities related to the climate, it should carry out activities to combat the climate crisis and contribute to the transition to a low-carbon economy,
- Determine the environmental risks that may occur by taking into account the sector and geography in which they operate and carry out studies to manage these risks,
- The product should reduce and/or zero its waste and wastewater generation, greenhouse gas emissions, chemical use, and all other environmental effects in its production, transportation, storage, and all other operations by using reuse, recycling, or substitution processes,
- Periodically control air emissions in order to prevent air pollution that may occur due to the sector,
- Focus on protecting ecosystems, habitats, and all species, especially endangered and endemic species, preventing land degradation, maintaining the capacity of natural ecosystems, continuously improving and developing them, and aiming to manage impacts on biodiversity in a sustainable way,

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- Waste should be collected separately at the source and recycled in accordance with legal regulations,
- Compliance with environmental legislation in all activities throughout production,
- While performing its activities, it should keep the environmental permits, licenses, and all documents up-to-date and follow compliance with the legal regulations,
- Identify chemicals that pose a threat to the environment and manage them appropriately to ensure their safe handling, labeling, transport, storage, use, reuse, recovery, or disposal,
- Identifying hazardous chemicals for the environment and ensuring that these chemicals are disposed of as a result of the necessary procedures and managed accordingly,
- All documents regarding environmental compliance should be sent to Nuh Çimento in accordance with this specification.

## **7. RESPONSIBILITIES**

### **7.1. Responsibilities Of Purchasing Nuh Çimento Group**

#### **Purchasing Units;**

- NUH ÇİMENTO GROUP Purchasing Directorate determines its functional strategies in line with the objectives of NUH ÇİMENTO GROUP.
- Adopts the category management approach; brings together similar purchasing groups and topics and classifies them according to their importance and complexity. In this context, it is responsible for planning high-level category strategies in line with NUH ÇİMENTO GROUP Purchasing functional strategies.
- Creates category strategies in coordination with Demand Units by positioning according to the situation in the supply market on the basis of categories and sub-categories.
- Supports the budget planning processes in coordination with the relevant Demand Units. The budget plans are created to play an important role in determining the category strategies. For this reason, Demand Units share their approved budget plans with the relevant Purchasing Units.
- In accordance with the category strategies approved by the Purchasing Director, NUH ÇİMENTO GROUP applies a purchasing approach compatible with the Strategic Purchasing methodology.
- Working in coordination with the Demand Units during the creation of the demand, it supports the Demand Units in demand management and standardization and optimization of specifications.
- Responsible for executing the end-to-end procurement process from the origin of the request.
- It performs contract management and supplier management on behalf of all group companies by combining the commercial and technically integrated needs of NUH ÇİMENTO GROUP Companies.
- Due to the fact that it is within the scope of the company's trade secrets; is responsible for the confidentiality of the correspondence with the companies regarding the requested document, the contract and its annexes, bid prices, and costs. It performs supplier management in order to use resources and time in the most appropriate way.





- - Applies the supplier segmentation approach, which classifies suppliers according to their impact on business, within the scope of supplier management, implements supplier performance management with periodic evaluation studies in order to monitor the ongoing performance of suppliers and to catch improvement opportunities.

## 7.2. Responsibilities of Request Units

### Demand Units;

- In order for the Purchasing Units to make long-term purchasing planning, it shares the approved budget plans with the relevant Purchasing Units in the periods and procedures defined in the procedures.
- Taking into account the purchasing and in-house business processes, it is responsible for determining the needs at the appropriate time and works in coordination with the Purchasing Units in the demand processes.
- After determining the needs, it determines the specifications by preparing the requested document, and technical specification documents in order to trigger the procurement processes.
- Before the request is submitted, it receives the approval of the Technical Specification and the application of the NUH ÇİMENTO GROUP Companies, especially the IT security procedures, and submits it to the Purchasing Unit.
- Responsible for completing the relevant budget and investment committee approvals and opening requests via SAP systems in order to complete the purchasing processes of the requests.
- Prepares the Technical Specifications and demand documents in a way that does not include the features that will cause a particular supplier to gain superiority over other companies or the issues that will restrict receiving offers from some suppliers.
- All kinds of correspondence, commitment, confirmation, etc. to be made with the suppliers during the demand management, purchasing process, and contract process. is responsible for the execution of transactions through the Purchasing Units. In this context, since it is within the scope of a trade secret; NUH ÇİMENTO GROUP is obliged to comply with the Information Security rules in order to ensure/protect the confidentiality of the correspondence made with the companies regarding the request document, the contract and its annexes and costs.
- Does not share the budget amounts related to their needs and demands with the Suppliers.
- If requested by the Purchasing Units, it evaluates the proposals and solution offers from the suppliers in technical and analytical terms, and transmits the evaluation reports/results to the Purchasing Units within the determined service level periods (SLA).
- Responsible for filling out periodic supplier performance evaluation surveys in order to measure the technical and capacity performances of the suppliers.
- Considering that the order approvals required for the continuation of the purchasing process will be given by the Purchasing Units within the framework of the authorization limits determined in the signature circular, it gives approval for the awarding decision from the Purchasing Units for the completion of the purchasing processes.



- It does not negotiate prices, order goods or services, or make any verbal agreements or e-mail commitments with companies. On the contrary, behavior is considered a violation of this Policy.

## **8 . PURCHASING POLICY**

### **8.1. Demand Management**

Purchasing Units cooperate with the Demand Units from the formation of the budget plans and support the Demand Units when necessary in the preparation of the budget.

Purchasing Units take part in the planning and budgeting processes of Demand Units, consolidate these studies and work on standardizing the product specifications regarding the demands, as a result of these studies, the following year's Purchasing planning is formed;

- It initiates the resource/supplier determination processes by determining the new expenditure categories to be purchased.
- It determines the purchase agreements that will remain in effect by renewal/extension or renegotiation.
- It sets savings targets on the basis of expenditure categories.

Purchasing Units analyze the needs of the requested service / product, exclude non-obligatory features and specifications and reveal real needs, prioritize the needs lists in coordination with the Demand Units.

These studies enable the selection of the most effective strategies in the supplier selection process and the determination of critical performance indicators related to demand.

### **8.2.Strategic Procurement**

NUH ÇİMENTO GROUP Purchasing adopts the 6-stage strategic purchasing approach shown below, which aims to optimize the products and services received from the suppliers, to save money and to provide the desired service quality level.

NUH ÇİMENTO GROUP Strategic Procurement Methodology

1. Conducting internal analyzes
2. Supply market and cost analysis
3. Category positioning and top-level category strategy
4. Creating detailed purchasing strategies
5. Implementation of category and purchasing strategies
6. Supplier performance and supplier relationship management

## **9. PURCHASING MANAGEMENT**

Purchasing Units initiate resource determination and supplier selection processes in coordination with Demand Units, perform stock/status control regarding the resulting demand, and analyze needs.



The total cost of ownership approach is used in relation to the demand in the resource determination process. Purchasing Units receive Quotation and Price Quotations from the suppliers in the list of potential suppliers by choosing one/some of the following methods.

- RFI (Information Request): It is made with the aim of collecting information about the solution proposals and business competencies of the suppliers. It is mostly used in the budget and project planning stages.
- RFP (Request for Quotation): It is the process of collecting detailed specifications from suppliers regarding their Proposals and solutions.
- RFQ (Request for Quotation): It is the process of collecting quotations in which quotations are requested from suppliers with all their detailed breakdowns. All details that affect the price, such as payment terms, delivery, and quality conditions, must be included in the RFQ.
- Closed Envelope: It is the submission of offers from suppliers together with the supplier files at the specified date and time. Bidding conditions and envelope scopes are submitted to the companies when necessary. Bids submitted in Closed Envelopes are opened by the purchasing committee. Complying with the principle of equal treatment to all suppliers in RFX, or Envelope Bid collection processes, RFX documents, and Bid invitations are sent via e-mail or in writing in accordance with confidentiality principles. In order to create a procurement process based on competition and equality, all relevant standards and provisions are communicated to the suppliers in the RFX processes and must be accepted by the participating suppliers, within the framework of the rules that will not cause uncertainty. Every change made in the rules is shared with all suppliers in a timely manner.

RFX processes are carried out via e-mail or in writing, notified by NUH ÇİMENTO GROUP Purchasing. It is the responsibility of the Purchasing Units to obtain the necessary documents from the Suppliers according to the scope and technical specifications of the work in the RFX processes.

After the RFX or Closed Envelope Bid collection process, Bids are analyzed in terms of technical criteria, meeting requirements, supplier's competence, and price. If necessary, it is decided to work with the supplier who offers the best price, technical performance, and quality by bringing the bids to the same base. All bid negotiations and price negotiations are carried out by the Purchasing Units.

The proposal of the supplier to whom the work is decided is submitted for approval in accordance with the approved authorization limits of NUH ÇİMENTO GROUP in accordance with the Procurement Procedures to be published. Suppliers, Demand Units, and relevant stakeholders are notified after the awarding decision is approved.

After the purchase decision is approved, a contract must be made on behalf of NUH ÇİMENTO GROUP Companies in cases involving financial, commercial and legal risks. Purchasing Units are responsible for maintaining contract negotiations with suppliers. It negotiates the provisions of the contracts by taking the opinions of the necessary stakeholders, and obtains the approval of the provisions regarding the legal articles from the Legal units. Purchasing Units are responsible for tracking supplier signatures, obtaining internal approvals and completing signatures according to authorization limits.



Purchasing Units are responsible for obtaining Performance Guarantee or Temporary Guarantee in order to minimize commercial, financial and legal risks within the scope of contracts and bid processes.

Following the mutual signing of the contract, placing orders or sending work orders to suppliers within the framework of the delivery program are made by the relevant Purchasing Units.

After the delivery of the product/service, the Demand Units perform the goods/service acceptance processes according to the results of the quality and quantity control.

Purchasing Units are not responsible for order and contract transactions regarding purchases whose purchasing processes have not been performed by the Purchasing Units.

Although it is essential to make the payment for the works subject to the purchase in accordance with the Company Payment Principles, if a different application is to be made, this situation is stated in the specifications and/or contracts.

### **Commitment, Principles and Principles**

NUH ÇİMENTO GROUP is an international cement and building materials company that is constantly growing and developing by making a difference in its sector with its 57 years of experience, wide product range, innovative employees, and approach that respects people and the environment. Considering the principle of separation of duties; Purchasing Units and other units perform their procurement duties within their responsibilities in accordance with company policies and this Policy.

Sustainability in our main strategy is our guiding principle in the selection of raw materials, products and services. As NUH ÇİMENTO GROUP, in all purchasing activities, the issue of observing the environment, society and human rights along with ethical principles is observed with great sensitivity.

### **10. Contract Management**

While it is essential to sign NUH ÇİMENTO GROUP template contracts with the suppliers, determined by the Purchasing and Legal Unit, the approval of the Legal Unit is required if contracts other than the specified template contracts are used. The signed contracts are in the nature of trade secrets and it is the responsibility of the Purchasing Units to record and follow up the contracts in the purchasing systems. Contracts form the legal basis of relations with suppliers during the procurement process, and it is ensured that the contracts are complied with. Contract management is carried out in accordance with the procurement procedure to be published by NUH ÇİMENTO GROUP Purchasing.

In accordance with company policies and confidentiality provisions, contracts should be kept for minimum legal periods, their confidentiality should be respected and they should not be disclosed to unrelated/unauthorized third parties.





## 11. Supplier Relationship Management

Managing the studies for determining and implementing the supplier relations strategy in the purchasing process, creating and managing the supplier portfolio of NUH ÇİMENTO GROUP, receiving, evaluating and accepting/rejecting new supplier applications, evaluating supplier performances, determining and implementing the actions to be taken according to the evaluation results, examining and implementing the supplier facilities. NUH ÇİMENTO

GROUP Purchasing is authorized to develop corrective/improvement suggestions by making evaluations, to create and follow-up the list of suppliers that are not suitable to work with; Purchasing Units make the necessary arrangements and put them into practice.

### Our suppliers:

It has to comply with the legislation in force (processing and protection of personal data, fight against corruption, competition, environment, occupational health and safety, intellectual and property rights, etc.) within the scope of the current contractual relationship with Nuh Çimento Group.

It respects ethnic and cultural differences and takes measures for the protection and development of differences, and commits to creating working environments where equal opportunities exist, in mutual trust, without discrimination, and respectful of human rights.

Receives the necessary congratulations for the health and safety and security of employees. Violation of the immunity of supplier employees in any way through physical, sexual, psychological and/or emotional harassment is not tolerated in the workplace or any place where they are due to work.

It respects its employees' right to unionize and their decision to become a union member, their right to organize and collective bargaining in accordance with the law.

It respects and protects the human rights, human dignity and privacy of the communities it affects through its business activities.

### 11.1. Supplier Selection

Firms that want to work with NUH ÇİMENTO GROUP Companies register by specifying their business fields and competencies in NUH ÇİMENTO GROUP. By using supplier registration surveys, the strengths and weaknesses of potential suppliers that meet the determined criteria are determined by analyzing them by Purchasing category units according to their business areas. Among the suppliers who apply, those who are suitable in terms of technical capacity, commercial and financial competence are included in the potential supplier pool.

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## 11.2. Supplier Segmentation

Supplier Segmentation is an approach to classify suppliers according to their impact on the business in order to use resources and time in the most effective way and to optimize the added value of purchasing.

Purchasing Units classify suppliers in terms of business volume, replacement costs, product/service, etc., and perform supplier performance management.

## 11.3. Supplier Performance Management

The purpose of Supplier Performance Management is to monitor the performance of suppliers in line with determined criteria and objective information and to identify commercially beneficial improvement opportunities.

Suppliers technical capacity, commercial and financial adequacy, etc. are included in the performance evaluation processes.

The ongoing performance of the suppliers is periodically measured by NUH ÇİMENTO GROUP Purchasing, improvement opportunities are determined and implemented within the framework of cooperation. It is essential that the criteria and rules regarding supplier performance management are shared with the Suppliers in a transparent manner.

The results of the Supplier Performance management are taken into account in the stages of whether to continue the existing works, to determine the suppliers to be offered for new purchases, and to evaluate the offers.

All technical, commercial, ethical and reputational risk situations originating from the supplier are constantly examined, and suppliers violating the rules are included in the list of companies that will not work with the approval of NUH ÇİMENTO GROUP Purchasing management.

## 11.4. Supplier Development Programs

In line with the needs of the NUH ÇİMENTO GROUP Companies of the suppliers;

- Using continuous improvement methods to develop and improve the products and services they offer,
- Innovation, value analysis, cost reduction studies
- Planning and implementation of corrective and preventive actions to eliminate identified nonconformities,

It is carried out in a planned and systematic way by the Purchasing Units within the scope of Supplier Management.



## 11.5. Supplier Creation

Purchasing Units work with the relevant units in order to guarantee the investments to be made in critical areas, to develop alternative suppliers in monopoly categories, to identify suppliers in order to develop new products and establish new business partnerships, to prepare development and cooperation programs for these suppliers and to implement these programs.

## 12. Principles of Ethical Purchasing

Transparency, honesty and honesty constitute the core values in purchasing processes. The relations of NUH ÇİMENTO GROUP Employees with stakeholders and suppliers are based on the basic values, the details of which are given below.

- Accuracy and honesty are our primary values in all our purchasing processes.
- As NUH ÇİMENTO GROUP Purchasing team, we attach importance to the confidentiality of all information regarding our activities. We use this information only for the purposes of NUH ÇİMENTO GROUP and share it with the relevant people within the determined authorities.
- NUH ÇİMENTO GROUP As the purchasing team, we aim to stay away from conflicts of interest. By making use of our current duties and authorities; We do not derive personal benefits from people and organizations with whom we have business relations, personally, through our family or relatives.
- Suppliers cannot be burdened except by legal regulations and commercial practices.
- Suppliers are approached fairly and equally in line with competition and market conditions.
- Evaluation is made according to fair and objective criteria in supplier selection.
- Tender processes are concluded in a transparent manner on the basis of objective criteria, away from any external influence.
- Relationships are carried out on a transparent and fairground, avoiding any conflict of interest and without entering into a personal interest relationship with the suppliers.
- Contractual obligations to suppliers are fulfilled on time.
- Utmost care is taken to ensure that procurement processes are carried out in accordance with laws and company policies.
- Care is taken to ensure that suppliers comply with legal regulations and ethical rules, and necessary notifications and warnings are made in case of violations.
- Care is taken to ensure that the company and its suppliers act in accordance with human health and environmental policies.
- Within the scope of purchasing activities, competitors are competed legally and within the framework of “NUH ÇİMENTO GROUP Companies Business Ethics Rules”.
- Attitudes and behaviors that will harm the brand value of NUH ÇİMENTO GROUP are not taken.

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**Business Ethics Rules**, which are a guiding guide that includes the values and working principles on which it is based in all business processes, relations with employees and all stakeholders. In this context;

- Conflict of interest: Suppliers must report any conflict of interest that arises in their professional relations with Nuh Çimento Group and allow us to determine the appropriate action in this regard. Nuh Çimento Group representatives or employees will be obliged to disclose any significant proprietary relationships or interests they have in relation to the business of any supplier.
- Bribery, corruption: To ensure compliance with the anti-bribery and anti-corruption laws and regulations, ethical principles, and universal rules applicable in all countries where our company operates, to ensure compliance with the obligations regarding the prevention of financial crimes, to evaluate our customers, transactions, products, and services with a risk-based approach, and to avoid potential risks. To raise awareness of all our employees on these issues by determining our strategies, related controls and measures, operating rules, and responsibilities for reducing the risk.
- Gift: Nuh Çimento Group and its subsidiaries are important customers for suppliers and service providers. All employees, especially those carrying out purchasing activities, may have the potential to encounter unethical and inappropriate offers from suppliers or other business partners. The steps to be followed by the employees are defined in the Anti-Bribery and Anti-Corruption Policy.
- Confidentiality: Suppliers must consistently protect and monitor Nuh Çimento Group's intellectual property, trade secrets, and other private, restrictive, and sensitive data or information. The data provided by Nuh Çimento Group will only be used for the purposes determined and accepted by Nuh Çimento Group and the supplier
- Anti-competitive and restrictive business practices: Suppliers are obliged to comply with local and international legislation aimed at promoting fair competition. This harmony is also important in terms of offering competitive prices and innovative products. In addition, individuals and institutions named in the blacklists published by national and international authorities on money laundering and terrorist financing in the country of operation, and companies located in countries subject to wide sanctions by the EU, the USA, or the United Nations, should not be in a firm relationship.

### **13. Enforcement**

NUH ÇİMENTO GROUP Purchasing Policy is submitted to the Board of Directors with the recommendation of the Purchasing Directorate, the evaluations of the Legal and Human Resources units, and the approval of the NUH ÇİMENTO GROUP CEO and Chairman of the Board, and enters into force with the approval of the Board of Directors.

Procedures, handbooks, process and system documents, and methodologies prepared in line with the Procurement Policy of NUH ÇİMENTO GROUP are submitted to the approval of the NUH ÇİMENTO GROUP CEO, with the recommendation of the "Purchasing Directorate", the opinion of the Human Resources and Legal units, and enter into force with the approval of the CEO and the Chairman of the Board of Directors.



## Sub procedures

- Purchasing Procedure
- Logistics and Inventory Management Procedures
- Process documents
- Documentation on System Methodology

  
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## **ENVIRONMENTAL POLICY**

### **1. PURPOSE**

Nuh Çimento Industry Inc. Acting with the awareness that the protection and improvement of the environment we live in is an integral part of our business; We aim to minimize the quality of our products and activities and their impact on the environment.

### **2. APPLICATION**

As NUH ÇİMENTO INDUSTRY INC. we commit,

- To Implement the Environmental Policy, to review regularly, document, and announce it to all employees and related parties,
- To increase the environmental awareness of all our employees through training and to reduce environmental pollution to the lowest possible level,
- To ensure compliance with the legal and other requirements in force by constantly monitoring the environmental aspects of all our activities,
- To determine environmental goals and objectives, to periodically review them and ensure the continuity of environmental performance,
- To research renewable energy and greenhouse gas emission reduction methods, to measure, to report and reduce greenhouse gas emissions,
- To reduce the use of natural resources necessary for our production activities by increasing the use of alternative fuels and alternative raw materials when it is ecologically reasonable, technically, and economically possible,
- To support the protection of ecosystems and biodiversity by using wastes that are harmful to the environment as alternative fuels and raw materials in order to ensure the sustainability of natural resources
- To pay attention to the existence of biodiversity areas, areas in special nature protection areas and historical/cultural areas, while determining our facilities and workplaces not to establish facilities in these areas



- To ensure that wastewater is analyzed in accordance with the legislation and recycled in the process, to ensure that studies are carried out to increase the quality of wastewater and to reduce water consumption in this direction,
  - To consider internal and external risks, to comply with the requirements of TS EN ISO 14001 Environmental Management System standards, to constantly review and implement them effectively and to integrate them with other management systems,
- Best regards.

Halim TEKKEŐIN

General Manager



## OCCUPATIONAL HEALTH and SAFETY

### 1. PURPOSE

The purpose of our Occupational Health and Safety Policy is to ensure that all Nuh Çimento Industry Inc. is to direct the activities aimed at providing a healthy and safe working environment for its employees.

It is aimed to raise awareness by regularly reviewing our occupational health and safety systems and practices and by providing training to our employees on this subject.

### 2. SCOPE

The policy scope covers Nuh Çimento employees, employees of subcontractor/supplier companies, visitors, and interns.

### 3. APPLICATION

As NUH ÇİMENTO INDUSTRY A.Ş. we commit;

- To implement the OHS Policy, reviewing it regularly, and announcing it to all employees and related parties,
- To evaluate and eliminate the risks by identifying the hazards related to Occupational Health and Safety, and minimizing the risks in cases where they cannot be eliminated,
- To provide a safe and healthy working environment, to evaluate and continuously improve OHS performance in order to prevent injury and health deterioration of all our employees and related parties,
- In all our activities, to comply with the occupational health and safety legislation and conditions of the organizations we are members of,
- To determine the targets related to Occupational Health and Safety, periodically review them to ensure their continuity,
- To contribute to the OHS performance evaluation and improvement activities with the consultation and participation of the employees,





- To organize training and to provide the necessary resources for the development of OHS responsibility and awareness of all our employees and related parties,
- To comply with the requirements of ISO 45001 Occupational Health and Safety Management System standards, to constantly review and implement them effectively, to integrate them with business processes and other management systems,

Best regards.

Halim TEKKEŞİN

General Manager



## QUALITY POLICY

### 1. PURPOSE

Nuh Çimento Industry Inc. We develop, produce, and sell durable and safe products that exceed the quality expectations of our customers. It provides the requirements of ISO 9001 Quality Management System in order to increase our quality performance in all our processes; We aim to continuously improve by providing the necessary resources.

### 2. SCOPE

Quality Policy scope; It includes the activities carried out at Nuh Cement. For this reason, the scope; It covers all products, services, and activities. (All processes from the raw material quarries to the loading of the final product to the customer's vehicle (bulk trailer, truck, and ship))

### 3. APPLICATION

**As NUH ÇİMENTO İNDÜSTRİYA.Ş. we commit;**

- To produce products of competitive and appropriate quality that meet customer requirements and the requirements of applicable standards,
- To establish, review, control, and maintain quality targets,
- To develop quality awareness by ensuring that the quality policy is understood by all employees, subcontractors, and suppliers,
- To continuously educate its employees with the understanding of continuous improvement,
- To comply with the requirements of the Quality Management Systems Standards, constantly reviewing them and implementing them effectively,

Best regards.

Halim TEKKEŞİN  
General Manager



## ENERGY EFFICIENCY POLICY

### 1. PURPOSE

Nuh Çimento Industry Inc. Energy saving awareness is a way of life for our employees. In order to prevent the intense energy consumption required for cement production, energy efficiency evaluation is made in all processes, and it is aimed to eliminate the negative effects with continuous improvement.

### 2. SCOPE

Energy efficiency scope; It includes the activities carried out at Nuh Çimento. For this reason, the scope; It covers all products, services, and activities related to Environmental Management Systems. (All processes from the raw material quarries to the loading of the final product to the customer's vehicle (bulk trailer, truck, and ship))

### 3. APPLICATION

As **NUH ÇİMENTO INDUSTRY A.Ş.** in order to prevent the intense energy consumption required for cement production, during all our activities we commit,

- To Implement the Energy Policy, to review it regularly, to document and to announce it to all employees and related parties,
- To prefer energy efficient technologies and applications, to evaluate alternative and renewable energy sources, to use energy and natural resources efficiently,
- To make energy-efficient choices in the purchase of products, equipment, and services and to support design activities that will improve our energy performance,
- To establish a system for the continuous improvement of energy performance and to ensure efficiency,
- To determine energy targets and objectives, to monitor energy performance by periodically reviewing,
- To provide all necessary information and resources to ensure energy efficiency, to provide training to our employees,



- To comply with the applicable legal and other conditions that we are subject to regarding energy use, consumption, and efficiency,
- To comply with the requirements of TS EN ISO 50001 Energy Management System standards, to constantly review and implement them effectively and to integrate them with other management systems,

Best regards.

Halim TEKKEŞİN  
General Manager



## INFORMATION SECURITY MANAGEMENT SYSTEM POLICY

### 1. PURPOSE

To protect the information assets of NUH ÇİMENTO against all internal, external, intentional, or accidental threats in the course of ensuring the continuity of basic and supportive business activities.

### 2. SCOPE

This policy is implemented by Nuh Çimento Sanayi A.Ş. includes information assets. Applied by employees in all locations, suppliers/contractors inside and outside the location.

### 3. APPLICATION

Information Assests;

- It protects against any unauthorized access,
  - It provides privacy,
  - It keeps its integrity,
  - It provides information accessibility to the stored Business processes,
  - Legal and regulatory requirements, provisions in contracts with third parties (business partners, customers, suppliers) are constantly monitored and met,
  - Information Security Awareness Trainings are given to all employees,
  - It provides information accessibility to the stored Business processes,
  - It provides the continuity and development of the Information Security Management System within the organization.
  - NUH ÇİMENTO Inc. is a mandatory document for suppliers, service providers, external sources, and all personnel in cooperation with
- Best regards.

Halim TEKKEŞİN

General Manager



## EMISSION POLICY

### 1. PURPOSE

Nuh Çimento Industry Inc. it follows the studies carried out by international organizations regarding the reduction of greenhouse gas emissions and coordinates these studies at the national level. Priority is given to giving opinions, contributing to the studies on this subject, making investments to support the reduction, raising awareness by providing trainings and raising awareness.

### 2. SCOPE

Emissions policy scope; It includes the activities carried out at Nuh Çimento For this reason, the scope; It covers all products, services and activities related to Environmental Management Systems. (All processes from the raw material quarries to the loading of the final product to the customer's vehicle (bulk trailer, truck, and ship))

### 3. APPLICATION

**NUH ÇİMENTO INDUSTRY INC.** in all our investments and activities we have realized as;

- Keeping the emissions under the targets set apart from the legal regulations by following up with online measurement systems in the 3 main furnace chimneys in order to follow up the emissions that occur as a result of our activities,
- Preferring efficient fuels with a lower emission factor in order to reduce the amount of greenhouse gas emissions occurring in our activities,
- Preventing emissions by electrifying equipment and vehicles used at the point of extraction and transportation of raw materials,
- Evaluating the effects of the activity on emissions and greenhouse gases by making a preliminary assessment of emissions before starting the activities,
- Complying with all relevant national legislation and contributing to the relevant national strategies and action plans,

We direct our efforts to reduce emissions with our principles.

Best regards.

Halim TEKKEŞİN

General Manager



## PACKAGING USE DEVELOPMENT POLICY

**NUH ÇİMENTO INDUSTRY INC.** In all our investments and activities we have realized;

- Process and usage follow-up to increase efficiency in packaging stages of our activities,
- Keeping the weight of the packages we use in our activities at a minimum level,
- Establishment and sustainability of systems for the reuse or recovery of packaging waste generated as a result of our activities,
- Evaluating the effects of the activity on natural resources and the environment by making a preliminary assessment on packaging before starting the activities,
- Complying with all relevant national legislation and contributing to the relevant national strategies and action plans,

We direct our efforts to increase water efficiency with its principles.

Halim TEKKESIN  
General manager



## NUCLEAR SECURITY AND EMERGENCY PREPAREDNESS POLICY

**NUH ÇİMENTO INDUSTRY INC.** In all our investments and activities, we have realized;

- Avoiding the use of sources and equipment that will cause nuclear radiation in our activities,
- Conducting radiation measurements at the entrance of the wastes accepted to the factory throughout our activities, applying quarantine measures in an inappropriate situation,
- Ensuring continuous safety by working by our personnel in charge of radiation,
- Keeping alarm systems operating continuously in case of a possible nuclear disaster in our environment,
- Raising awareness of personnel on nuclear safety issues,

We direct our efforts to increase nuclear safety with its principles.

Halim TEKKESIN  
General manager