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HWS TR RESPONSIBLE PURCHASING PRINCIPLES		

Scope

This document applies to all employees of Hailo Wind Systems Enerji ve Sanayi Tic. Ltd. Şti. ("HWS Türkiye") who are directly or indirectly involved in the procurement of goods and services.

Purchasing activities are carried out in accordance with the organization's ethical values, corporate policy principles, Group standards, and applicable legislation.

I. INTEGRITY AND CORPORATE ETHICS

Social and Corporate Responsibility

HWS Türkiye conducts all purchasing activities in line with the following principles:

- integrity
- transparency
- fair competition
- corporate responsibility

These principles form the basis of all purchasing activities.

Compliance with local legislation, international standards, and Hailo Wind Systems Group principles is essential in purchasing processes.

Transparency

Supplier selection and evaluation processes are based on:

- the ISO 9001 standard
- internal procedures
- objective performance criteria

These criteria are used as the basis for supplier selection and evaluation.

Suppliers with whom an employee has a personal, family, or financial relationship must be disclosed to the relevant manager before any order is placed in order to prevent conflicts of interest.

No preferential treatment may be given to individuals or companies involving a spouse, relative, close acquaintance, or other personal relationship. All such supplier relationships must be disclosed to the relevant manager in advance, and the employee concerned shall not participate in the decision-making or approval process.

Business Relationships

Relationships with suppliers are based on:

- mutual respect
- professionalism
- long-term cooperation
- sustainable value creation

These principles form the basis of supplier relationships.

HWS Türkiye protects its own intellectual property rights and also respects the rights of its business partners.

II. GIFTS, HOSPITALITY AND BENEFITS

Impartial decision-making is essential in purchasing processes.

- No gift or benefit received from suppliers may influence purchasing decisions.
- Cash or cash-equivalent benefits are strictly prohibited.
- Gifts of limited value may be accepted provided that their total value does not exceed €30 per supplier per year. Gifts exceeding this limit may only be retained with the approval of the relevant manager. (The €30 limit is applied in accordance with the Joachim Loh Group Purchasing Code of Conduct.)

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- Acceptance of gifts must be transparently reported within the Purchasing Department, and the person accepting the gift acknowledges and accepts that such disclosure will be made.
- Participation in event invitations or incentive-related organizations is permitted only with managerial approval and transparent disclosure.

III. SUPPLIER SELECTION AND WORKING CONDITIONS

HWS Türkiye aims to work only with suppliers that comply with, or commit to complying with, the following fundamental principles:

- compliance with applicable labor laws
- compliance with regulations concerning working hours and workplace conditions
- prohibition of child labor and forced labor
- compliance with occupational health and safety standards

The following criteria are considered in supplier evaluations:

- quality
- delivery performance
- sustainability
- ethical compliance

These criteria are taken into account during the supplier evaluation process.

Nonconformities identified at suppliers are reported, and the necessary improvement actions are requested.

IV. ENVIRONMENTAL RESPONSIBILITY AND RESOURCE MANAGEMENT

HWS Türkiye aims to reduce the environmental impacts of its purchasing activities.

In this context, the following principles are applied:

- preference for recyclable packaging
- responsible use of natural resources
- energy efficiency
- compliance with applicable environmental legislation

These principles are taken as the basis.

Suppliers are also expected to adopt a similar approach to environmental responsibility.

V. IMPLEMENTATION AND RESPONSIBILITY

Compliance with these principles is the responsibility of:

- all employees involved in purchasing activities
- relevant managers
- process owners

All parties listed above are responsible for compliance with these principles.

HWS Türkiye ensures that employees are informed of these rules and implements the necessary control and monitoring mechanisms to ensure compliance.

Management Commitment

This document has been approved by HWS Türkiye management and aims to ensure the implementation of an ethical, transparent, sustainable, and fully legally compliant purchasing approach.

Factory Manager

Hasan Tatlı