

# BANTBORU 2022 Sustainability Report







**Ingenuity**

is what defines us, driven by our seamless R&D and manufacturing capabilities, and business practices that consistently meet and often exceed expectations.

**Reliability**

is at the core of our business, as we partner with leading national and global OEM brands in their long-term projects.

**Sustainability**

is our unwavering commitment, influencing every aspect of our growth as a reliable provider of innovative business solutions.

We work diligently to enhance the values we bring through our business and wholeheartedly strive for a more equitable, fairer, and sustainable planet.

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**Dear Stakeholders,**

As I pen this foreword, I am filled with a sense of pride and responsibility. As BANTBORU becomes a multi-national, multi-cultural entity, we stand at a pivotal moment in our history – a juncture where our rich legacy of business ingenuity and reliability converges with our aspirations for a sustainable future. This journey, detailed in the pages of this report, is more than a strategic choice; it is the embodiment of our core values and beliefs that have been integral to BANTBORU since day one.

2022 has been a time of hectic work, vibrant excitement, and massive pride for us, as we were preparing for a substantial business growth in 2023, a very special year that would mark not only the beginning of our next 50 years, but also the centennial of Turkish Republic. While investing and organizing for international expansion with growing business partnerships and capacities, we were also working on renewing our corporate identity in a way to express our firm commitment to the core characteristics of our brand. As brands grow from inside out, we have committed ourselves to the continuous development of our business capabilities and to the incorporation of universal guiding principles to enhance sustainability with all its aspects throughout the value chains. Our efforts in this direction, just as the development of our business is an unending working process and a learning curve, for we believe that improvement is an unending process. This report is a testament on how we performed towards this goal in our 50th year, and what we deem elemental for future periods.

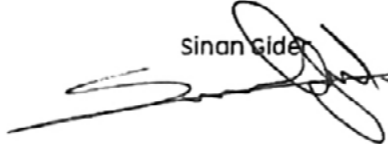
The more we document our journey by incorporating our integrity and our sense of responsibility for a better life on a sustainable planet into our business procedures and processes, the more we internalize our success in creating a true collective of innovative, accountable, and dedicated professionals. Together, we have built more than just a business; we've cultivated a community deeply committed to making a meaningful impact on the world. The path to sustainability is intricate and ever evolving, but our vision remains steadfast: to embed sustainable practices into the very fabric of our operations, influencing every decision and action.

This vision transcends the traditional bounds of environmental care. It represents a comprehensive approach where economic progress, social responsibility, and environmental stewardship coalesce. Our aim is to generate value that enriches not only our shareholders but extends to our employees, customers, communities, and the environment. This report is a testament to our ongoing efforts to champion not only business ingenuity and reliability, but also sustainability by advocating for inclusive growth, and safeguarding our planet for the generations to come.

As you journey through this report, I invite you to join us in this ongoing quest. It is a path marked by challenges, yet rich with opportunities to drive meaningful change. Together, we can forge a future where sustainability is not merely an objective but a fundamental aspect of how BANTBORU operates.

Thank you for your continued support and partnership in shaping this amazing journey.

Respectfully,

Sinan Gider  




# BANTBORU Sustainability Commitment



Established in 1972, we have proudly earned for ourselves a reputation, as a reliable partner for ingenious solutions for pioneering brands in automotive and cooling industries, supplying mission-critical tubing systems in its first 50 years.

The centennial of our Republic and the 51st year of our establishment, 2023 is a particularly important year, as it marks the beginning of a new chapter in our story as we bring our global footprint, that spans to a vast geography from Argentine to China, to a new dimension with production in multinational locations. With our production facilities becoming operational in 5 countries in 3 continents, we are becoming a multi-geographic, multi-cultural entity.

We are resolute in our determination to continue growing as a reliable provider of ingenious business solutions with a steadfast commitment to long-term sustainability.

We are dedicated to reducing our environmental impact through energy efficiency, renewable energy sourcing, water and resource conservation, while promoting positive social impact in a socially conscious, ethical, and compliant manner.



## Our Corporate Purpose

Our corporate purpose is to continuously improve ourselves for more added value in our business ecosystems, more production and employment, and a better social life on a more sustainable planet.

From state-of-the-art vehicles that shape today's and tomorrow's mobility, to refrigeration appliances that not only preserve food and prevent energy and food waste but also bring comfort to living spaces; we provide the lifeblood vessels for products that bring value to everyday lives around the globe.



We work resolutely to improve our business as a reliable original equipment manufacturing partner for global leaders of automotive and refrigeration industries, for which environmental and social wellbeing is an integrated business factor, and endeavor wholeheartedly for a better social life, more fairness and more equality on a sustainable planet.

## Our Sustainability Commitment



As a global corporate citizen, we aim to collaborate with our stakeholders to create a better future for all. We are committed to advancing our sustainability goals through a combination of ingenuity and reliability, recognizing the importance of preserving our planet for future generations and promoting social equity.

As a Women's Empowerment Principles (WEPs) signatory and a UN Global Compact participant, we are fully committed to our responsibilities towards society, the environment, and within all our ecosystems. At BANTBORU, ethical principles are a cornerstone of our

operations. We are dedicated to being environmentally, socially, and ethically responsible by continually innovating and improving in all aspects of our operations.

We will keep sustainability as a top-level priority, and area for senior leadership for BANTBORU's top-level management.

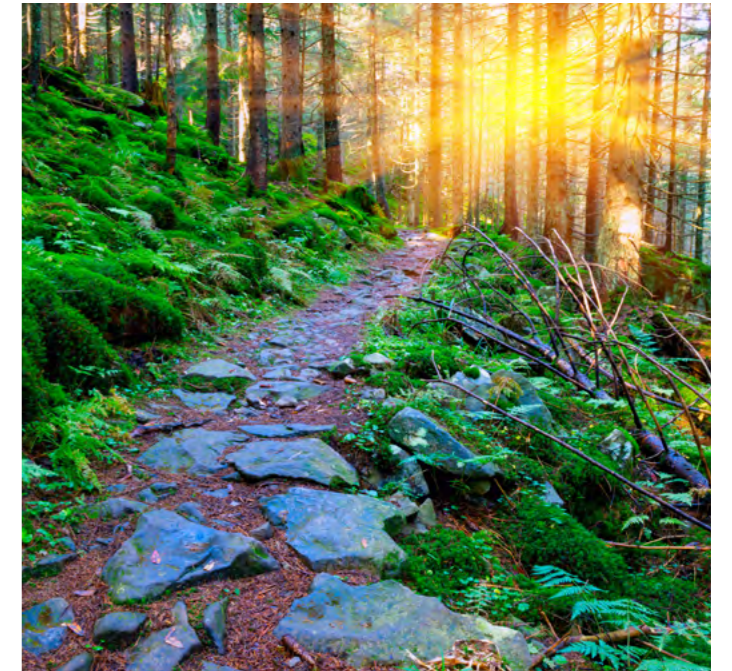
We will minimize our carbon footprint and promote energy efficiency, responsible resource use, waste management, and other sustainable practices throughout our operations.

We commit to ensuring non-discriminatory, fair, and equal treatment, employment and occupation for all our employees and partners. Additionally, we are dedicated to actively addressing social and economic inequalities in the communities we serve, and, Upholding high ethical standards uncompromisingly in all our business dealings.

This report serves as a testament of our actions towards this goals, and we are committed to make each action a stepping stone for higher achievements in subsequent periods of action and reporting.

## Our Sustainability Strategy

Our sustainability strategy is based on identifying, understanding, and prioritizing our organization's and operations' impacts on the economy, environment, and people. This includes defining prioritized issues for Sustainability and pursuing continuous improvement, as well as transparently reporting our efforts to our stakeholders and other interested parties.



Like all aspects of our business management commitment, transparency, fairness, responsibility, and accountability form the basis of BANTBORU's sustainability approach. Our materiality priorities are determined based on our company's sense of responsibility and its urgency and capacity in addressing key issues. Stakeholder insight and universal ESG primacies, as defined by global business and sustainability networks, are also taken into consideration for each sustainability reporting period, which is defined annually in line with universal guidelines. Through these steps, we ensure tangible progress in our sustainability commitment and reporting, aligning our word with our work in line with our core values.

BANTBORU's materiality assessment for each reporting period is defined in accordance with priority insights provided by studying universal ESG assessments and standards, as well as understanding industry and community expectations.

As BANTBORU gains a multi-geographic, multi-cultural identity with production facilities in five locations across three continents, we are establishing institutional policies in line with universal standards for Governance, Human & Labour Rights, and Anti-Corruption measures.

On environmental issues, we are focusing on Climate Change and reducing Carbon Emissions, Resource Efficiency with a bias on Electricity, Natural Gas and Water, as well as Waste Management.

On social issues, we are focusing on Data privacy and security, Human Rights and Working Conditions, Occupational health and safety. In addition to our activities and monitoring in these issues, our Business Ethics documentation (CoC) and related business procedure and policy documents provide solid orientation and requirements in these areas.

In all focus areas we are seeking ways and means for continuous improvement, while making these improvements subject to operational procedures and providing in-house workforce trainings where applicable to ensure the integration of our sustainability practices to our operations and business plans.



# Sustainability Governance at BANTBORU

## CEO & Board of Management

The BANTBORU CEO is the highest executive responsible for customer management, strategic business planning, innovation/R&D, product portfolio, investments, and capital expenditures, as well as other critical areas with assistance from the Board of Management and the Executive Board.

Led by our CEO, the BANTBORU Board of Management is our company's highest decision-making body. The Board is responsible for setting strategic direction and establishing corporate policies, delegating, and overseeing the management of day-to-day operations; as well as for the overall stewardship of our company's reputation and corporate well-being.

Our sustainability progress is also an area of stewardship for our CEO, the Board of Management and the Executive Board. We undertake our responsibilities to our planet, ecosystems, the communities we inhabit, and humanity at large with a universal perspective, considering the local and global implications of our actions, just as we conduct our business.



## Executive Leaders

BANTBORU executive leaders are our Executive Board member Directors and Department Managers, who provide executional leadership for all our strategies and day-to-day operations. This leadership is shaped by uncompromising adherence to legal and corporate regulations in all our operational areas and geographical regions, and to BANTBORU Business Ethics Principles (BEPs) which are clearly stated in our Code of Conduct document, along with its related guidelines and procedures, as well as an utmost respect for the environment, society, and the ecosystem.





## Spearheading Sustainability

Accountable to the Board of Directors and in partnership with our executive leaders, our Sustainability and broad ESG engagement is spearheaded by our BANTBORU HSE & Sustainability Department. Our HSE & Sustainability Manager and the team direct the design, development, execution, and continuous improvement of our ESG strategy, goals, and initiatives. The team, along with our executive leaders, maintains regular contact with key stakeholders including customers, employees, NGOs, the media, and community leaders, providing insights for broader Materiality and Stakeholder Engagement.



Our expectation from all our employees, as well as from our suppliers, consultants, agents, independent contractors, and from everyone who conducts business with, for, or on behalf of BANTBORU, is to comply with our Sustainability and Ethics principles. This expectation is emphasized in the BANTBORU Code of Conduct (BANTBORU Business Ethics Principles / BEPs) and BANTBORU Supply Chain Sustainability and Ethical Principles documents, prepared in line with our sustainable and ethical principles. Our Code of Conduct is a binding guide for all our employees, suppliers and all our stakeholders on how we will do our business from now on as of the date of its publication.

We expect all our suppliers and business partners to act in accordance with the BANTBORU Supply Chain Sustainability and Ethical Principles, which are prepared in line with BEPs and the procedures related to our business.

For future reporting periods, we are considering further enhancing the binding nature of Sustainability and Ethics engagement for all employees at all levels, with clearly stated role-specific responsibilities, KPIs, and annual performance goals. We also plan to implement this for our suppliers and business partners, with specific clauses in service and purchase agreements, as well as goals and standards subject to auditing.

## Top-Level Management Insight and Input

Meaningful progress and organizational alignment in sustainability require CEO-level engagement.

Our CEO provides oversight and executional leadership on our Sustainability strategies and tracks our progress.

With periodic presentations and follow-up meetings, our Board of Management oversees our Sustainability strategies, objectives and activities, opportunities, and related risks. These periodic meetings are held at least annually with a review on all significant policies, processes, commitments, and projects, with additional updates and engagement as necessary.

BANTBORU CEO and Board of Management thus act as Sustainability steering body within the company, with cross-functional, top-level management insight and input.

Our HSE & Sustainability Department oversees operational design, development, execution,

and continuous improvement of BANTBORU Sustainability ESG strategy, goals, and initiatives, engaging with key stakeholders, top-level management and international bodies such as the UN Global Compact Board.

For future reporting periods, we are considering to further connect Sustainability in CEO's and the top management's responsibilities with annual performance goal regarding tracking our Sustainability performance.

## Materiality\* and Stakeholder Engagement

While assessing, defining, identifying and understanding the impacts of our organization and operations on the economy, environment, and people, and prioritizing Sustainability issues; we give consideration to stakeholder expectations, to continuously improve our strategies and endeavors. Our understanding of these expectations provides insight into important environmental, social, and governance issues, which helps us set priorities.

We identify our key stakeholders as our customers, employees, suppliers and otherwise business and project partners, Government and regulatory bodies, NGOs (as a broader term also referring to UNGC Board and UN Women), media and the community. Engaging with this stakeholder ecosystem and giving huge consideration to their expectations form the center of our corporate purpose and our strategy to achieve our sustainability goals and long-term success for our business.

For future reporting periods, we aim to create further improved platforms for two-way dialogues and multi-participant sharing, which will provide us with wider insight and deeper understanding.

At the same time, with the contribution of the UNGC Climate Ambition Acceleration Program, which we participated in 2021, and the UNGC SDG Ambition Acceleration Program, which we participated in 2023, we are working and constantly improving to achieve the goals we have set in the triangle of society, environment and economy by using our resources efficiently and correctly.



(\*): Materiality and its relevant definition and its usage in this report are different than the definition used in the context of filings with the SEC. Issues deemed material for the purposes of determining our Sustainability strategies & activities and for the purposes of this report may not be considered material for SEC reporting purposes.

**Stakeholders**

<b>Customers</b>	<b>Employees</b>
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**Engagement Methods**

INDUSTRY Guidelines on Principles to Enhance Sustainability Performance In Supply Chain	Group Meetings	Office & Plant Interaction
Customer Meetings	One-on-One Meetings	Ethics Electronic Mail
Customer Audits	Trainings & Workshops.	
Surveys	Suggestion Reward System	
Industry Events	Career Development Meetings.	
Ethics Electronic Mail	Surveys	
	KPI Reports	

**Stakeholder Concerns**

<b>Corporate Governance &amp; Business Ethics</b>	Anti-Corruption and Anti-Money Laundering	<b>Environment</b>	Carbon Neutrality	<b>Health &amp; Safety</b>
	Data Protection and Data Security		GHG Emissions	
	Financial Responsibility/Accurate Records		Water Quality, Consumption & Management	
	Disclosure of Information		Air Quality	
	Conflicts of Interest		Responsible Chemical Management	
	Counterfeit Parts		Circularity	
	Intellectual Property		Animal Welfare	
	Export Controls, Trade, and Economic Sanctions		Biodiversity, Land Use and Deforestation	
	Grievance Mechanism		Soil Quality	
	Remediation			
Non-retaliation				
<b>Human Rights &amp; Working Conditions</b>	Child Labor/Labour and Young Workers	Workspace		
	Wages and Benefits	Personal Protective Equipment		
	Working Hours	Emergency Preparedness		
	Modern Slavery	Incident and Accident Management		
	Ethical Recruiting	Health and safety of contractors as extended supply chain		
	Freedom of Association and Collective Bargaining			
	Non-Discrimination and Harassment			
	Women's Rights			
	Diversity, Equity, and Inclusion			
	Rights of Minorities and Indigenous Peoples			
Land Rights and Forced Eviction				
Private or Public Security Forces				

<b>Suppliers</b>	<b>Government &amp; Regulatory Bodies</b>	<b>NGOs</b>	<b>Media</b>	<b>Community</b>
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BANTBORU Supply Chain Sustainability & Ethical Principles	Ongoing Direct & Indirect Engagement	Ongoing UNGC & WEPS engagement	Interviews	Direct & Indirect Engagement with Local Governments
Ethics Electronic Mail		Reporting	Media Inquiries	Direct Community Engagement & Social Events
Purchase Contracts	Industry Umbrella Organizations	Ongoing proactive and reactive NGO engagement	Press Releases	Industry Umbrella Organizations
Supplier Audits & Surveys		NGO Events	Media Get-Togethers	Social Projects, Community Inquiries
Meetings & Discussions	Ethics Electronic Mail	In-person meetings	Ethics Electronic Mail	WEPS Events
		Ethics Electronic Mail	Corporate social responsibility (CSR) projects	Ethics Electronic Mail
		Corporate social responsibility (CSR) projects		Corporate social responsibility (CSR) projects

Business Continuity	Tax	Climate change	Corporate Governance	Supporting Local Communities
GHG emissions	Trade	Environmental Stewardship	Business Practices & Performance	Local Employment Continuity
Fair Sourcing	Compliance	Women's Rights & Empowerment	Broader Sustainability Approach	Respect, Fairness & Transparency
Business Ethics	Business & Industry -related Regulatory Issues	Operational Impact on Environment	GHG Emission Reductions	Clean Air, Land & Water
	ESG-related Regulatory Issues	Business Ethics	Transparency	Good Corporate Citizenship
		Compliance	Women's Rights	
		Sustainable Sourcing		
		Human rights		
		Transparency		







# Environment

In an era defined by the urgency of environmental stewardship, sustainability has become the cornerstone of responsible business practices. Yet, this journey is not without its hurdles, and the global automotive and refrigeration value chains continue to undergo profound transformations. As a reliable provider of ingenious business solutions for both industries' pioneering enterprises, our sustainability engagement shaped by our profound understanding on these shifts and challenges they present is integral to facilitating a greener future together.

## The Influence of Generation Z

A notable shift in recent years is the emergence of Generation Z, a demographic cohort with a pronounced emphasis on environmental consciousness. This generation is keenly aware of the environmental impact of industries, particularly the automotive and refrigeration sectors. They view cars not merely as modes of transportation, but as significant contributors to emissions and environmental degradation. This perspective presents both a challenge and an opportunity for these industries. Companies, whether in automotive, refrigeration, or across the business spectrum, must adapt to these changing preferences. Meeting the demands of this eco-conscious generation necessitates a comprehensive approach that encompasses sustainable production practices, low-impact materials, and emissions-reducing technologies.



## Environmental Consciousness

The automotive landscape is experiencing a seismic shift towards electrification and autonomous driving technologies. This transition demands a reconfiguration of componentry, including mission-critical pipe and tube systems. Our challenge lies in not only adapting to these technological leaps, but also in ensuring that our products meet the rigorous requirements of electric vehicle components. Additionally, the current global semiconductor chip shortage has amplified supply chain disruptions, underscoring the need for a reevaluation and reinforcement of our logistics strategies. This is essential to guarantee uninterrupted supply to our automotive partners and navigate through this challenging period.





Simultaneously, the refrigeration sector grapples with its own set of challenges. The imperative to adopt environmentally friendly refrigerants has led to a fundamental transition away from traditional HFCs. This transformation demands that we develop and produce tubes compatible with alternative, low-GWP refrigerants. Additionally, the call for energy-efficient systems requires us to continually refine our tube designs and materials to enhance thermal conductivity and reduce overall energy consumption.

In conclusion, as an ingenious and reliable business partner to the global automotive and refrigeration industries, we embrace this spectrum of challenges as opportunities for growth and innovation, we remain dedicated to delivering high-quality, sustainable and eco-friendly solutions. These solutions not only meet the evolving needs of our partners, but also contribute to a more resilient and sustainable future. Through strategic investments in research and development, close collaboration with industry leaders, and an unwavering commitment to compliance and quality, we are poised to overcome these challenges and continue to be a trusted partner for all stakeholders in these vital industries.

## BANTBORU Environmental Sustainability Approach & Materiality



Our balanced and enduring approach to sustainability is ensured by BANTBORU's comprehensive Environmental Policy.

Aligned with our engagement in the UN Global Compact, we prioritize stakeholder concerns and identified areas for improvement. We proactively address environmental challenges and disseminate information within our organization and ecosystems. Our goal is to guarantee the long-term durability and continuous improvement of our sustainability efforts.

Our learnings within the UNGC Climate Ambition Acceleration Program, which we participated in 2021, form guidance for our Environmental Sustainability materiality and efforts, as we endeavor to use our resources efficiently and correctly towards our objectives.

## 2022's Material Topics regarding the Environment are defined as;

- Reducing Greenhouse Gas (GHG) Emissions in own operations
- Reducing Electricity consumption per unit of production
- Ensuring a meaningful ratio of Renewable Energy usage
- Reducing Natural Gas consumption per unit of production
- Reducing Water Consumption per unit of production
- Reducing Hazardous & Non-Hazardous Waste Quantity per unit of production
- Ensuring an increased ratio in Waste Recycling
- Providing Environmental Training for direct and contract employee teams
- Institutionalizing Compliance to Environmental Laws

## Reducing Greenhouse Gas (GHG) Emissions

Our aim is to reduce the emission values caused by the greenhouse gas sources under our responsibility within the boundaries of our organization. Activity data in our organization is calculated and reported by accounting methodology.

According to our CCF Reports; we aim to regularly declare our corporate carbon footprint values in the following years and to reduce it by 3% in the following year by constantly monitoring the carbon footprint rates per unit product sold. Compared to the Base Year, 2020, it was resulted that the carbon footprint rates per product in 2021 decreased by approximately 13% for Categories 1&2 and by 5% for all categories.

Throughout this declaration process for 2020 and 2021, we have published Corporate Greenhouse Gas Monitoring, Measurement, and Evaluation Procedure and established a Greenhouse Gas Inventory Development Team. Further trainings have been provided to the designated individuals in this team to state their roles, responsibilities, and authorities according to ISO 14064.

In addition, relevant suppliers have been requested to provide LCA declaration documents in order to calculate conversion factors for raw materials in in GHG inventory.

In connection with our next Sustainability Reporting Period (2023), we are implementing measures to detect identifiable emissions sources open to improvement, to review Greenhouse Gas Targets, and to evaluate potential offset projects.

### GREENHOUSE GAS EMISSIONS PER UNIT OF PRODUCTION

Year	2021	2022
Greenhouse Gas Emissions per Unit of Production - Total	4.59	4.17
Greenhouse Gas Emissions per Unit of Production - Scope 1&2	1.35	0.93



## Reducing Electricity Consumption & Renewable Energy Usage

We reduced our Electricity Consumption per Unit of Production by 6.76 % compared to 2021.

In last quarter of 2020, Solar Energy Systems are installed on 15,000 square meters of roof area in our three production facilities located in Turkey, at Gebze Organized Industrial Zone and Kocaeli Köseköy.

In 2022, we produced a total of 3 mw of electricity from solar panels. 2.5 mw of the renewable energy produced was consumed directly in production, and the remaining approximately 0.5 mw of energy was offset with the energy supplier and indirectly affected the production.

A project has been initiated by the Process Improvement and Maintenance Department to establish monitoring systems in selected pilot areas for potential improvements in energy consumption and detection of losses and leaks.

### ELECTRICITY CONSUMPTION & RENEWABLE ENERGY USAGE

Year	2021	2022
<b>Electricity Consumption</b>		
Total Electricity Consumption (kW)	9.727.956	9.640.211
Electricity Consumption per Unit of Production (kW/kg)	0,922	0,854
<b>Renewable Energy</b>		
Renewable Energy Generation (kW)	283.500	2.541.720
Renewable Energy Usage Ratio (%)	The Solar Energy System (GES) was fully operational in October 2021.	22,12%

## Reducing Natural Gas & Water Consumption

We reduced our Natural Gas Consumption per Unit of Production by 5.92 % and Water Consumption per Unit of Production by 8.44 % compared to 2021.

### REDUCING NATURAL GAS & WATER CONSUMPTION

Year	2021	2022
<b>Natural Gas Consumption</b>		
Total Natural Gas Consumption (dsm3)	538.274,00	543.707,24
Natural Gas Consumption per Unit of Production (dsm3/kg)	0,051	0,048
<b>Water Consumption</b>		
Total Water Consumption (m3)	14.124,50	13.885,00
Water Consumption per Unit of Production(m3/kg)	0,0013	0,0012

## Management of Non-Hazardous & Hazardous Wastes

In 2022, we have taken significant steps in waste management as well. Our efforts have resulted in reduced waste tonnes and increased recycling ratios.

### MANAGEMENT OF NON-HAZARDOUS & HAZARDOUS WASTES

Year	2021	2022
<b>Non - Hazardous Wastes</b>		
Non-Hazardous Waste Quantity per Unit of Production	0,105	0,095
Total Recycling Rate of Non-Hazardous Waste (%)	This metric started to be recorded in 2022.	99,97%
<b>Hazardous Wastes</b>		
Hazardous Waste Quantity per Unit of Production	0,051	0,040
Total Recycling Rate of Hazardous Waste (%)	This metric started to be recorded in 2022.	100%

## Institutionalizing Compliance to Environmental Laws

In 2022, 2866 total hours of Environmental Trainings have been provided for BANTBORU employees, as well as for relevant employees of our continuous contractors.

BANTBORU has not been subject to any penalties for non-compliance with environmental laws, both in 2021 and 2022.

### INSTITUTIONALIZING COMPLIANCE TO ENVIRONMENTAL LAWS

Year	2021	2022	
<b>Environmental Trainings</b>			
Number of Individuals Attending Environmental Trainings	Total	492	524
	Direct Employment	390	456
	Continuous Contractor Employees	102	68
"Hours of Environmental Training Provided "	Total	608	2866
	Direct Employment	429	2769
	Continuous Contractor Employees	179	98
<b>Complaints &amp; Penalties</b>			
Environmental Impact Complaints Submitted through Formal Mechanisms	Total Number of Complaints	NONE	
Penalties for Non-Compliance with Environmental Laws	Total Number of Penalties		
	Due Amount in TRY		





# Human Rights Saliency & Labour Materiality

We believe that upholding fundamental Human Rights is the ultimate humanitarian, governmental and corporate role for humanity's fair and sustainable development. Our materiality for Labour issues and Human Rights saliency are interlaced, for we aim a positive impact starting from our employees and suppliers.

BANTBORU is thus committed to the highest standards of human rights and labour practices, recognizing that respecting these fundamental rights is essential not only for sustainable development but also for the sustained welfare of the company, its business ecosystems and all related communities.

For our 50th anniversary, BANTBORU has not only enlarged its Business Ethics Procedure but also instated a comprehensive and binding Code of Conduct. This Code unequivocally embraces an absolute intolerance towards transgressions of human rights and includes steadfast commitments against retribution, coerced labor, prejudicial treatment, and any form of malfeasance. Our Code of Conduct extends beyond mere compliance, fostering honest and lawful business practices to protect our corporate reputation as well as that of our customers.

We are acutely aware of our responsibilities towards society, humanity, and the environment, acting with a heightened sense of social responsibility. These commitments are foundational to our operations, exemplifying our unwavering dedication to upholding ethical standards and fostering an equitable and inclusive workplace. The principles laid out in our Code of Conduct and Business Ethics Procedure reflect our ongoing effort to maintain integrity and transparency in all our business dealings and stakeholder interactions.

Guided by and aligned with internationally recognized human rights standards, including the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work, our Human Rights approach and our Code of Conduct, as well as our Labour-related policies and are based on the goal of achieving and maintaining the highest standards and values across all our locations.

We require all our employees and our business partners to recognize and adhere to universal human rights standards, while fostering employee satisfaction and development in a fair and inclusive workplace through our Working Conditions and Human Rights Policies, which form the essential of our Labour practices.

We are attentive to all our employees right to clean water and sanitary systems, we recognize and respect the indigenous peoples' land and otherwise rights and the rights of refugees and migrants within the framework of applicable laws; and we are sensitive to the preservation of natural resources, in all our locations around the globe.

## Gender Equality and Women's Rights

We are fully committed to ensuring non-discriminatory, fair, and equal treatment, employment, and occupation for all our employees and partners.

In line with the Women's Empowerment Principles (WEPs), we integrate full equality and diversity into our corporate culture and aim to foster a more equitable environment both within and beyond our workplace.

As of 2022, women constitute a growing presence at BANTBORU with 35% representation at administrative roles (white collar) and in mid-level management and 25% representation on our Board of Directors. Committed to bridging the gender gap, we ensure equal pay and champion women's advancement and female leadership, proudly exceeding industry norms and setting a standard for gender equality.



## BANTBORU TOTAL WORKFORCE BY GENDER, AGE GROUPS & EDUCATION LEVEL

Total Workforce	2021	2022
	492	492
<b>Direct Employment</b>		
Female	44	44
Male	397	390
<b>Continuous Subcontractor</b>		
Female	16	21
Male	35	28

Total Workforce by Age Groups							
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
88	91	215	212	115	112	23	19
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
0	0	23	25	28	24	0	0

Total Workforce by Education Level				
	Direct Employment		Con. Sub.	Total
	Primary Education (8 years)	2021	198	46
2022		190	44	234
Highschool Graduates	2021	173	5	178
	2022	170	5	175
License and Above	2021	70	0	70
	2022	74	0	74

Understanding the unique dynamics of our industry, we maintain a workforce composition in line with sector-specific benchmarks, acknowledging the comparatively lower presence of women in production roles due to complex sociological factors. These factors include traditional family structures and the allocation of household roles that significantly impact the professional choices and opportunities available to women.

As evident from the concrete examples of female leaders emerging within our company and our equal pay for equal work policies, ensuring that both men and women receive fair compensation for their contributions within our organization, top-level corporate leadership for gender equality and women's right is integral to BANTBORU's DNA.

The proportion of female employees in relation to the total workforce and their representation at different levels, the number of caregivers by gender and the rate of return to work after maternity leave, the ratio of male to female candidates in new employee recruitment, as well as resignation rates by gender and among key metrics that we follow in accordance with Gender Equality and Women's Rights, as well as a broader approach to Human Rights and Labour. These indicators are prioritized in line with our company's sense of responsibility and its urgency and capacity in addressing key issues, as well as understanding of stakeholder insight and universal ESG primacies. Our indicators also enable us to measure and publicly report on progress to achieve gender equality, in compliance with our WEPS engagement.

While watching the development in these indicators, we aim to keep adding new indicators, such as the number of relevant applications to the Ethics Committee, with compliance rates and individual targets set for the adoption of practices implemented under Diversity and Inclusion, to enhance our ability to address relevant issues for our future reporting periods.





## BANTBORU EMPLOYMENT FIGURES & WOMEN'S REPRESENTATION

Professional / Administrative Workforce (White Collar):	2021	2022
	73	77
Female	26	28
Male	47	49

By Age Groups							
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
11	18	34	31	17	17	11	11

Operational / Manual Workforce (Blue Collar):	2021	2022
	368	357
Female	18	16
Male	350	341

By Age Groups							
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
77	73	181	181	98	95	12	9

Representation at Different Levels	2021	2022
Mid-Level Management	15	17
Female	4	7
Male	11	10
Senior Management	9	12
Female	1	2
Male	8	10
Board of Directors	4	4
Female	1	1
Male	3	3

By Age Groups							
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
0	0	7	13	6	3	2	1
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
0	0	2	1	6	10	1	1
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
0	0	1	1	1	1	2	2

Employment Figures	2021	2022
Talent Acquisition (Hirings & Recruitments)	16	35
Female	3	4
Male	13	31
Talent Departure (Resignations & Severences)	44	18
Female	5	2
Male	39	16
Promotions	2021	2022
Female	0	5
Male	3	7

By Age Groups							
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
7	14	9	21	0	0	0	0
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
4	3	33	13	7	0	0	2
18-30		31-40		41-50		51 and Above	
Female	Male	Female	Male	Female	Male	Female	Male
0	2	5	4	0	3	0	1

## CARE GIVING EMPLOYEES & MATERNITY LEAVES

Care Giving Employees	2021	2022
Care Givers	183	198
Female	10	15
Male	173	183

By Age Groups							
18-30		31-40		41-50		51 and Above	
2021	2022	2021	2022	2021	2022	2021	2022
0	0	65	72	118	126	0	0

Employees Beginning Maternity Leave	23	17
Female	2	3
Male	21	14
Employees Returning to Work After Maternity Leave	23	16
Female	2	2
Male	21	14

### A Process Delayed Due to the Pandemic: WEPS Gap Analysis

In 2022, we have grasped the fact that we have not only postponed some of our plans, but also delayed the Gap Analysis for our organization, mostly because of the restrictions and changes of priorities and urgencies caused by the COVID-19. We fully acknowledge the importance of the Gap Analysis is very important for every organization in order to foresee the challenges that can be faced.

After completing our GAP Analysis, we concluded that we have been managing and evaluating our actions, as well as our internal & external communications on gender equality and women empowerment issues in a scattered manner and that we didn't have a process leader to manage them from a single point. Thus, these issues, actions and communications are now under the responsibility of our HSE & Sustainability Department, which was formed in 2021.

We have addressed to gender equality and to non-discrimination issues with specific and concise language with our Code of Conduct: "BANTBORU does not tolerate any adverse treatment or discriminatory behavior against anyone within the company and its suppliers because of race, ethnic or national origin, skin color, nationality, gender, religion or beliefs, disability, age, marital status, sexual orientation, gender identity/expression or other individual characteristics protected by law. We expect all our business partners to act in accordance with BANTBORU standards and principles in working conditions, human rights, and social responsibility."

Within the framework of the principle to promote education, training and professional development for women, we had planned trainings and workshops on issues such as awareness for all our employees, personal development and work-life balance for female employees. We have taken our first step in re-implementing the Breast Cancer Awareness Training on Women's Day. We intend to expand such initiatives in cooperation with the management of GOSB (Gebze Organised Industrial Zone), where our Istanbul plant is located, and to unroll such activities in our other locations around the globe in our future reporting periods.

Another subject which emerged in our Gap Analysis was lack of meaningful action on implementing enterprise development, supply chain and marketing practices that empower women. We have set a priority to gender awareness in supply and started dialogues with our female-led suppliers within this context. We participated the "Gender Responsive Procurement (GRP) Summit", organized in Istanbul by UN Women Türkiye, in partnership with KAGİDER (The Women Entrepreneurs Association of Turkey) and the Global Compact Türkiye on October 21, with one of our female suppliers.

We have also participated the "Empowering Women in the Workplace, Marketplace, and Community" and the "UN Women and WEPS Focused Gender-Sensitive Human Resources Policies and Budgeting" webinars, organized by UN Women and TAYSAD (Automotive Suppliers Association of Turkey), respectively.



## Policy Improvements for Diversity & Inclusion

In 2022, we have participated the Business World Diversity & Inclusion Workshop, and afterwards prepared an action plan.

Our recruitment materials' parameters were revised and questions, notes and records regarding blood type, gender, marital status, nationality were deleted from job application forms and application pools, while criminal record notes were excluded from application pools.

Parental leaves' periods were extended to 8 days, beyond related legal rights.

All our related procedures were revised with an emphasis on diversity and inclusion in all phases of all our business processes.

## Elevating Female Leadership

In 2016, BANTBORU welcomed Özge Topbaş to its family as a Quality Chief, marking the beginning of a remarkable journey in leadership and professional development. Özge, with a solid background in Chemical Engineering and enriched by experiences in quality management in the automotive sector - including roles in both OEM and leading TIER 1 companies, brought a wealth of knowledge and expertise to the team.



Özge's role at BANTBORU began with her leading the Quality Team, where she demonstrated exceptional leadership skills and a deep commitment to maintaining the highest standards in quality management. Her adept handling of team responsibilities and proactive approach to challenges marked her as a standout leader within the organization.

In a significant career milestone in 2022, Özge was appointed as the Factory Manager of BANTBORU's production facility in Spartanburg, USA. This appointment was not just a testament to her exceptional leadership and technical skills but also a reflection of BANTBORU's commitment to promoting internal talent and embracing gender diversity in leadership roles. Her new role as the highest-ranking executive in the company's US operations symbolizes BANTBORU's dedication to nurturing and recognizing talent across its global operations. This appointment to leadership in a global location is a beacon of inspiration and sets a precedent for aspiring leaders within the organization.

Özge's journey is a powerful example of BANTBORU's commitment to career development and leadership cultivation. It underscores our approach to sustainability, not just in terms of environmental and social impact, but also in fostering a sustainable, diverse, and inclusive workforce.

This case study exemplifies BANTBORU's ethos of recognizing and developing talent, promoting diversity, and providing opportunities for growth and leadership within a global framework. It's a testament to how individual career journeys can align with a company's broader sustainability and inclusivity goals, creating a positive ripple effect throughout the organization and beyond.

## Boosting Female Competitiveness

To ensure the visibility of gender and equal opportunity in society, we have also focused on supporting women in sports platforms, in addition to our internal efforts.

## Equality at Start Line, Equality in Life

Our first step in this area was in the automotive sector, where we provided uninterrupted sponsorship support to İlayda Hancı Korkut, Turkey's only female Off-Road SI Class Winner, for five years from 2017 to 2022, enabling a female athlete to compete on equal terms.

Launched in 2017, the BANTBORU Off-Road Team continued as a long-term program until 2022. In our communication efforts, gender equality has always been at the forefront. We believe that highlighting this equality and conveying the message that "women and men are equal on the road as in all aspects of life" is crucial for fostering a collective perception of equality.



## A Female Champion in the Making

Starting in 2022, we began providing sponsorship support to another female athlete, Zeynep Sönmez, who is at the beginning of her professional career and achieved her first professional championship in 2020. Zeynep Sönmez is an athlete with high ambitions in the Olympics, Grand Slam tournaments, and the World rankings, and she possesses the determination and talent to achieve these goals.

One of the most important issues in this sport is to ensure regular support for athletes who have demonstrated their potential at the national team level to achieve individual success on the international stage. We aim to do this with our sponsorship support, while Zeynep Sönmez aims to achieve a huge career leap in 2023 with BANTBORU support.





# Freedom of Self Expression and Freedom of Association & Collective Bargaining

As we aspire to be an employer and a business partner of choice through our values, inclusive commitments and our policies & procedures that shape our everyday work, our Code of Conduct has a whole section acknowledging BANTBORU's responsibilities towards its employees and stakeholders.

As indicated in the Code of Conduct and in related policies & procedures, as well as in our UNGC COP 2021, We accept and adopt the freedom of our employees to make their voices heard, to organize and to unionize within their legal rights and to ensure internal work peace. There is a union within BANTBORU, and collective labor agreements are made at regular intervals. We also take care to ensure that all our employees can easily reach BANTBORU senior management when they want to be heard.

## UNIONIZATION FIGURES

"Unionization within BANTBORU (Total Workforce)"		Female	Male	Total	"Operational / Manual Workforce (Blue Collar) Unionization"		Female	Male	Total
2021	Unionized	18	311	329	2021	Unionized	18	311	329
	Non-Unionized	26	86	112		Non-Unionized	0	39	39
	Unionization Ratio	41%	78%	75%		Unionization Ratio	100%	89%	89%
2022	Unionized	16	337	353	2022	Unionized	16	337	353
	Non-Unionized	28	53	81		Non-Unionized	0	4	4
	Unionization Ratio	36%	86%	81%		Unionization Ratio	100%	99%	99%

# Work Peace and Employee Satisfaction

We ensure the implementation of a balanced and fair wage and benefit policy with strict adherence to non-discrimination in respect of employment and occupation; taking care to improve the quality of life and standards of our employees to the extent of the possibilities of the organization.

We organize training and development activities on subjects that will ensure the business and personal development of our employees and prepare an environment that will help them plan their careers. Such trainings are also available for the employees of our contractors.

## EMPLOYEE & CONTRACTOR TRAININGS

		2021	2022	
BANTBORU Employee Trainings	<b>Total Number of Participants</b>	482	464	
	Professional / Administrative Workforce (White Collar):	Female	31	27
		Male	53	52
	Operational / Manual Workforce (Blue Collar):	Female	18	19
		Male	380	366
	"Total Hours of Trainings (Hour x Participant)"		6.280	12.420
	Professional / Administrative Workforce (White Collar):	Female	96	560
		Male	263	1.060
	Operational / Manual Workforce (Blue Collar):	Female	285	448
		Male	5.636	10.352
	Per Capita Training Hours (Approximate Value)		14	29
	Professional / Administrative Workforce (White Collar):	Female	3	21
		Male	5	20
Operational / Manual Workforce (Blue Collar):	Female	16	24	
	Male	15	28	

		2021	2022	
"Contractor Trainings by BANTBORU"	<b>Total Number of Participants</b>	51	49	
	Female	16	21	
	Male	35	28	
	"Total Hours of Trainings (Hour x Participant)"		226	301
	Female	25	194	
	Male	201	107	
	Per Capita Training Hours (Approximate Value)		4	6
	Female	3	13	
Male	3	4		



## BANTBORU Employee Satisfaction Study

Our Employee Satisfaction Study is one of the key indicators of Work Peace and Employee Satisfaction at BANTBORU.

### BANTBORU EMPLOYEE SATISFACTION STUDY

Year	Satisfaction (%)
2021	80
2022	85

BANTBORU does not tolerate favoritism, abrasive behavior, harassing behavior including physical, sexual, and psychological harassment. Anyone who engages in such behavior may be subject to disciplinary action, including dismissal, in accordance with the provisions of BANTBORU Disciplinary and Implementation Regulation.

BANTBORU has always been against forced labor and has given importance to continuous improvement efforts to eliminate drudgery. The collective labor agreement we have made with our employees is the guarantee of this. The overtime contracts we make with our employees every year as an institution is one of the important measures we take against forced labor.

BANTBORU strongly opposes child labor, illegal employment, forced labor, modern slavery, and human trafficking in any form. We take all legal measures in this direction, including our business partners and all stakeholders with whom we have business contact, and we show sensitivity in the implementation of these measures.

## Suggestion Reward System

With the aim of encouraging change and development, and increasing motivation by evaluating and rewarding employee suggestions, we are stimulating improvements in processes and methods, thereby increasing quality and efficiency, and reducing costs.

In 2022, 51 of the 70 suggestions submitted to our suggestion system were implemented within our continuous improvement perspective, these 51 employees' suggestions that were implemented were rewarded and a tree was donated to TEMA Foundation for each suggestion maker.

### EMPLOYEE SUGGESTIONS & IMPLEMENTATIONS

Year	Suggestions Received	Implemented Suggestions
2021	32	25
2022	70	51

Number of Implemented KAIZEN Initiatives	
2021	50
2022	32

## A Safe and Healthy Working Environment

We offer our employees a healthy, safe, and productive working environment by taking necessary measures and encouraging compliance with these measures. Beyond the legal requirements; ISO45001 H&S Management System, our related H&S Policy and documentation system, as well as our Code of Conduct are essential elements of information flow in Workplace Health & Safety.

We implement health and safety measures aligned with national and international standards. We provide our employees with the personal safety equipment they need to use for their work and trainings on the use of this equipment.

We make our plans on emergency preparedness, occupational accident prevention and management of occupational accidents, disaster preparedness, and provide necessary trainings to all our employees. These training are also available to all our contractors and their employees, to ensure their compliance with the rules and practices applicable in our company regarding Occupational Health and Safety. To ensure that public and private security personnel working for workplace security do not violate human rights in their practices, we show all care within the means, including training activities when necessary.

### OCCUPATIONAL HEALTH AND SAFETY TRAININGS

		2021	2022
<b>Total Number of Participants</b>		427	502
Direct Employment	Female	26	42
	Male	373	416
Continuous Contractor	Female	7	15
	Male	21	29
<b>"Total Hours of Trainings (Hour x Participant)"</b>		2.457	9.094
Direct Employment	Female	112	744
	Male	2.266	8.246
Continuous Contractor	Female	15	36
	Male	65	68



Employee and contractor trainings, as well as metrics on Accident Severity Rate, Accident Frequency Rate, Workplace Accident, Occupational Disease and Near Miss are closely monitored.

## OCCUPATIONAL HEALTH AND SAFETY METRICS

Incident	Accident Severity Rate			Accident Frequency Rate			Workplace Accident			Occupational Disease			Near Miss			
	Year	2020	2021	2022	2020	2021	2022	2020	2021	2022	2020	2021	2022	2020	2021	2022
Jan.		0.09	0.00	0.00	24.64	0.00	0.00	2	0	0	0	0	0	6	0	1
Feb.		0.09	0.00	0.00	18.58	0.00	0.00	1	0	0	0	0	0	6	2	5
Mar.		0.06	0.00	0.00	12.80	0.00	0.00	0	0	0	0	0	0	1	3	8
Apr.		0.05	0.00	0.00	10.77	0.00	0.00	0	0	0	0	0	0	1	11	
May		1.90	0.00	3.14	10.44	0.00	27.93	1	0	2	0	0	0	0	0	11
Jun.		1.59	0.00	0.50	8.73	0.00	33.65	0	0	2	0	0	0	0	8	5
Jul.		1.31	0.00	0.50	7.23	0.00	22.23	0	0	1	0	0	0	0	2	2
Feb.		1.11	0.00	1.22	6.09	0.00	40.82	0	0	1	0	0	0	2	1	2
Jan.		1.12	0.00	0.79	6.77	0.00	15.04	1	0	1	0	0	0	2	5	1
Feb.		1.01	0.00	0.10	6.09	0.00	13.85	0	0	1	0	0	0	0	1	3
Jan.		0.92	0.00	0.00	5.56	0.00	0.00	0	0	0	0	0	0	3	4	2
Feb.		0.83	0.00	0.00	5.02	0.00	13.72	0	0	1	0	0	0	2	4	0

## BANTBORU Code of Conduct on Employees' Responsibilities for Occupational Health and Safety

As all employees of BANTBORU, we support BANTBORU in its endeavor to provide a safe and healthy workplace for our business partners, as well as for everyone in and around our facilities: as a matter of our responsibility, we meticulously comply with all safety and health rules and practices related to our work.

We fulfil our responsibilities, including the use of appropriate personal protective equipment, operating machinery only according to instructions and taking appropriate action when a safety risk arises.

We honestly report situations that may adversely affect our judgement and/or physical functions during work and undergo necessary health checks in such cases. Except for social events where alcohol consumption is permitted, we do not consume alcohol anywhere in BANTBORU facilities or during business hours. We do not use or tolerate the use of recreational substances or illegal drugs on BANTBORU premises or during business hours.



## Inspired Gifts for Healthy Generations

We have contributed to UNICEF Turkish Committee's Inspired Gifts initiative with 600 doses of measles vaccine on World Children's Day, 20 November 2022. Being part of a global partnership for protecting the most vulnerable children from a deadly but preventable contagion risk and making a difference in the lives of the children living under difficult conditions around the world gives us a special sense of pride and belonging.

Happy World Children's Day!



**BANTBORU** Ingenuity Reliability Sustainability

## Camaraderie Overcomes All Obstacles

We believe in a world where we live on equal conditions and where all obstacles are overcome. December 4th, International Day of Persons with Disabilities, is a day of paid administrative leave for all our colleagues with disabilities, so that they can spend quality time with their loved ones. In 2022, this occasion was even more cherished, as they enjoyed a lunch hosted by our CEO Sinan Gider on December 3rd. This event fostered meaningful camaraderie and engaging conversations, reflecting our commitment to inclusivity.





# From Ethics Procedure to Code Of Conduct

In 2022, our Business Ethics Procedures and Ethics Policy documents were re-instated, with enlarged context and content, as our Code of Conduct, as a statement of our commitment to rules-and-ethics-based business making within the high degree of complexity of today's global supply and value chains.

Our Code of Conduct (BANTBORU Business Ethics Principles / BEPs) and BANTBORU Supply Chain Sustainability and Ethical Principles documents unequivocally embrace a position of absolute intolerance towards any kind of corruption. Prepared in line with our sustainable and ethical principles, these documents state our responsibilities and form guidelines for many aspects of our business, from data privacy.

The BEPs are binding for all employees at all levels, including contingent and contractual, definite and indefinite term, part-time and temporary employees and officers working in all facilities and joint ventures of BANTBORU in Turkey and other countries, as well as our suppliers and business partners.

## Absolute Intolerance Towards Corruption

BANTBORU acts within the framework of national Laws, Regulations and other legal rules and internationally recognized legal rules applicable in all geographies where it operates and in all its activities.

We are committed to utmost sensitivity in preventing all types of crimes and illegal activities, including crimes against the state's security, crimes against the constitutional order and the functioning of this order, embezzlement, misappropriation, bribery, theft, fraud, counterfeiting, abuse of trust, fraudulent bankruptcy, bid rigging and interference with tenders, interference with the performance of an obligation, money laundering or smuggling arising from crime, financing terrorism, being affiliated or connected with terrorist organizations, false testimony, perjury, corruption, and extortion, in all areas in which we operate.

We intend to further strengthen our position of absolute intolerance towards corruption with binding clauses in contractor, direct and indirect supplier, partner and client agreements; backed by regular audits, training, and transparent reporting for our future reporting periods. We are also committed to continuously update and enforce the policies to adapt to the evolving legal and ethical standards in anti-corruption practices globally.





# Adherence to Data Security & Privacy

We have strict and binding regulations for Data Security and Privacy that are laid out clearly in our Code of Conduct, our ISO27001 Document and in our BANTBORU Information Security Policies.

We comply with the confidentiality rules of our employees, customers, all persons, institutions and organizations with whom we do business and/or cooperate; we do not share their information and personal data with third parties without permission and/or legal obligation. We comply with all relevant laws and regulations governing data privacy wherever we do business.

We keep all kinds of information, especially the information contained in the personal files of our employees, whether private or not, and we do not interfere with the private lives of employees. We fulfil the requirements of Personal Data Protection Law (KVKK) and other legislation and respect the privacy of our employees.

Our adherence to Privacy also applies to situations such as reporting ethical violations or misconduct; or to rising questions on relevant issues. In such cases, the applicant's identity is kept confidential, unless there is a legal requirement to do so.

BANTBORU does not tolerate retaliatory misconduct such as dismissal, threats, harassment or other retaliatory misconduct by any person or persons within its own organization or within its business partners for reporting ethical violations and misconduct concerns, asking questions, reporting problems or assisting in a misconduct investigation in good faith.

## BANTBORU Code of Conduct on Basic Implementation of Data Privacy Practices

We do not share the confidential information of our company, our employees, our customers, the institutions and organizations we do business with persons and institutions unless there is a legal obligation to do so, and we comply with the confidentiality rules of our company and the institutions and organizations we do business with, unless the law prohibits it.



We use non-public information only for business purposes and do not share it with anyone inside or outside the company, including friends and family members, except for authorized persons. We do not talk about non-public information in public places, and we carefully preserve all objects containing this information, including written documents, personal notes, mobile devices, computers, electronic storage devices. We password-protect all electronic devices we use to access BANTBORU information and immediately report any loss of equipment or information to our managers.

No electronic copy of any document belonging to the employer shall be recorded, printed or written or otherwise taken on paper, CD, DVD and other recording devices without the permission of the employer's authorities and outside the natural course of business. These documents cannot be transmitted to others electronically or by other methods and cannot be subjected to deletion, addition, tampering, assembly, etc. Unless there is a contrary legal situation, our obligation to comply with confidentiality rules continues even after we leave our job.

## BANTBORU Code of Conduct on Anti-Corruption

We do not share the confidential information of our company, our employees, our customers, the institutions and organizations we do business with persons and institutions unless there is a legal obligation to do so, and we comply with the confidentiality rules of our company and the institutions and organizations we do business with, unless the law prohibits it.

## Opposition to Bribery, Corruption, Fraud, Counterfeiting, Money Laundering, Assets Derived from Crime, Affiliations or Connections with Terrorist Organizations, and Terrorist Financing

BANTBORU does not tolerate any offences such as bribery, corruption, fraud, forgery and counterfeiting, money laundering and anti-financing of terrorism, which may be committed knowingly or unknowingly by its suppliers or third-party business partners, employees of these companies, as well as all employees within its own structure.

We show sensitivity to prevent such behavior in all areas in which we operate. We uncompromisingly comply with the laws on these matters and the relevant rules of BANTBORU BEPs and related procedures.

## Anti-bribery and Avoiding Behaviors That May Be Perceived as Bribery

In all geographies where we do business, we are determined to carry out all our activities in accordance with our ethical principles and in a way to ensure the highest ethical standards. We adopt all the principles of the UN Global Compact, of which we are a participant, we act in accordance with these principles, and we expect everyone we come into contact with as part of our activities to act in this direction.

Corruption, bribery and any form of benefit, transaction facilitating payments and inappropriate gifts in relations with official and civil authorities and organizations and in other business activities are behaviors that are illegal and subject to criminal sanctions in many countries, as well as violating the UN Global Compact's principle of "Businesses should fight corruption in all its forms, including bribery and extortion". At BANTBORU, we do not engage in, nor do we tolerate these behaviors.

We do not offer, promise, or even imply any improper financial payment, cash, loan or commission or any behavior that will provide an improper benefit to a public official or any official or civil authority holder related to our business in order to provide a business or any other kind of advantage, even if local legislation and customs are flexible to such behaviors. When such a request or implication is received from any person regarding our business, we immediately forward the matter to the BANTBORU Ethics Committee and act as required by the law and our ethical principles.





# SDG Referencing

This report has been prepared in alignment with the United Nations Sustainable Development Goals (SDGs), which provide a framework for our sustainability approach at BANTBORU. The 17 SDGs, representing a global blueprint for peace, prosperity, and planetary health, have guided the development of this report. An accompanying index illustrates how our report's topics correlate with specific SDGs, highlighting both materiality and saliency.

## Environmental Materiality

<p><b>7</b> AFFORDABLE AND CLEAN ENERGY</p>	<p><b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>
<p><b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION</p>	<p><b>13</b> CLIMATE ACTION</p>

- Reducing Greenhouse Gas (GHG) Emissions
- Reducing Electricity Consumption & Renewable Energy Usage
- Reducing Natural Gas & Water Consumption
- Management of Non-Hazardous & Hazardous Wastes
- Institutionalizing Compliance to Environmental Laws

## Human Rights Saliency & Labour Materiality

<p><b>3</b> GOOD HEALTH AND WELL-BEING</p>	<p><b>5</b> GENDER EQUALITY</p>
<p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p>	<p><b>10</b> REDUCED INEQUALITIES</p>

- Gender Equality and Women's Rights
- Freedom of Self Expression and Freedom of Association & Collective Bargaining
- Work Peace and Employee Satisfaction
- BANTBORU Employee Satisfaction Study
- Suggestion Reward System
- A Safe and Healthy Working Environment

## Governance

**17** PARTNERSHIPS FOR THE GOALS

Sustainability Governance at BANTBORU

## Business Ethics

**8** DECENT WORK AND ECONOMIC GROWTH

Anti-Corruption  
Data Protection & Privacy





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