

Document No:	KEYS-POL-03
First Release Date:	18.03.2020
Revision Date:	04.08.2022
Revision No:	1
Page No:	1/7

Our company, which acts with the principle of adding value to the future and the responsibility we feel for our stakeholders, and has signed the Global Compact; Our Corporate Social Compliance Policy has been prepared in order to share with all our stakeholders a clear commitment that we will fulfill all kinds of responsibilities that fall on them by working as a team with all our business partners.

Our goal is to ensure that the Social Compliance Policy becomes the corporate culture within the organization. For this reason, social compliance standards have been established and started to be implemented. The social compliance policy is announced to all our employees and other stakeholders via communication channels such as internet, e-mail group, bulletin boards our stakeholders are informed via our official website and these criteria are integrated into the evaluation processes of our suppliers.

Within the scope of this policy, employees can openly declare all kinds of opinions, requests, concerns, concerns, complaints and suggestions, and these are evaluated by the Senior Management and necessary improvement activities are carried out for areas open to improvement.

Our Social Compliance Policy has been supported by the Klimasan Code of Conduct Document and has been prepared by adhering to the subject and scope of the Sedex (SMETA 4-PILLAR) Social Compliance Audit, which is periodically subjected to.

With this policy, we are committed to being a signatory organization of the UN Global Compact Global Principles Agreement, which is another indicator of our understanding of Social Compliance and Social Responsibility, and the continuity of cooperation studies that we have in common with UN Global Compact Turkey.

*With this policy, our contribution to the following Sustainable Development Goals has been mentioned;

- 3 Healthy Individuals
- 4 Qualified Education
- 5 Gender Equality
- 8 Decent Jobs and Economic Growth
- 10 Reducing Inequalities
- 13 Climate Actions
- 16 Peace, Justice and Strong Institutions

PREPARED	CONTROLLED	APPROVED
Ayşegül Güneş EYLEMER	Ayşegül Güneş EYLEMER	Alper EROL
Ayşegül Güneş EYLEMER	Ayşegül Güneş EYLEMER	Alper EROL



Document No:	KEYS-POL-03
First Release Date:	18.03.2020
Revision Date:	04.08.2022
Revision No:	1
Page No:	2/7

Klimasan Corporate Social Compliance covers the following topics;

- * 1. Ethical Business Behavior
- * 2. Egalitarian Approach (Prevention of Discrimination)
- * 3. Voluntary Work (Prevention of Forced Labor)
- * 4. Providing Underage Employment (Prevention of Child Labor)
- * 5. Working Hours and Wages
- * 6. Occupational Health and Safety
- * 7. Respect for Freedom of Association and Representation
- * 8. Receiving Suggestions, Wishes and Complaints
- * 9. Rest Days and Holidays
- * 10. Recruitment and Employment
- * 11. Employment Contract
- * 12. Providing Employment for Foreign Employees
- * 13. Prevention of Discipline and Harassment
- * 14. Protection Of The Environment
- * 15. Stakeholder Communication and Transparency

All the principles contained in this policy are implemented with the necessary regulations, legal regulations are followed and the topicality of the policy is ensured.

1. Ethical Business Behavior

Business ethics are standards of behavior that show how an individual should behave in the workplace based on moral values and rules. It includes the ability to distinguish between right and wrong and a commitment to doing what is right. Our institution does not tolerate any form of corruption, fraud, bribery or embezzlement. KEYS-KP-009 Notification Procedure was prepared for illegal, immoral or unethical issues within the company, and the employees were given the opportunity to make notifications by e-mail and telephone, and also shared the relevant procedure with its stakeholders on its official website.

The Klimasan Audit Committee reviews the Company's compliance with the business code of conduct and ethical rules, misconduct risk assessments, misconduct and business code of conduct, and the provision of code of ethics trainings. In addition, in order to support the practical operation of the Code of Business Ethics, which is being implemented in our company, an "Ethical Line" has been established that is open to

PREPARED	CONTROLLED	APPROVED
Ayşegül Güneş EYLEMER	Ayşegül Güneş EYLEMER	Alper EROL



Document No:	KEYS-POL-03
First Release Date:	18.03.2020
Revision Date:	04.08.2022
Revision No:	1
Page No:	3 / 7

the access of the company's employees and operates on the principle of confidentiality. The ethical Line, on ethical issues of concern to their employees concerns and complaints anonymously and operate independently operating on behalf of the board of directors and the internal audit reports to the audit committee to enable the company to get in through that section.

In order to prevent business ethics violations, Business Ethics Awareness Training is provided to all employees every year and the necessary documentation is kept up-to-date.

Klimasan Ethical Business Approach is detailed in the Klimasan Ethical Code of Conduct and Application Principles Document.

2. Egalitarian Approach (Prevention of Discrimination)

Klimasan has a deep-rooted commitment to stand against discrimination and ensure equality of opportunity. Race, gender, color, nationality, social origin, religion, age, disability, sexual orientation, marital, social or economic status, pregnancy or military service status, participation in and membership in trade union activities, political opinion, or any value protected by applicable law maintains its processes as an institution without discrimination on the basis of status or physical or verbal abuse. It has also integrated mechanisms that prevent discrimination into its processes. Employee selection for our company is made on the basis of minimum qualifications such as education, talent, work experience, vacant positions, interests, and personality inventory results.

With the awareness that equality of opportunity is one of the foundations of social sustainability, we accept as a basic principle to offer all our employees equal rights in matters such as free expression environment, remuneration, performance evaluation and employment, by not allowing discrimination between our employees and stakeholders under any circumstances. In this direction; We are committed to providing women with equal opportunities in the business environment and increasing our women's employment, to see, accept and value the religious, structural or cultural differences of all our stakeholders, to comply with anti-bribery and corruption laws and regulations, ethical and professional principles and universal rules.

All our fair business processes are controlled by Social Compliance Audits and are also shared with our stakeholders, especially our customers, through communication channels.

-			
	PREPARED	CONTROLLED	APPROVED
	Ayşegül Güneş EYLEMER	Ayşegül Güneş EYLEMER	Alper EROL



Document No:	KEYS-POL-03
First Release Date:	18.03.2020
Revision Date:	04.08.2022
Revision No:	1
Page No:	4/7

3. Voluntary Work (Prevention of Forced Labor)

Our company does not allow compulsory labor for any employee. The working principles in our company are based on the principle that no work can be done in return for a contractual obligation or debt and the work will be voluntarily. If the employee quits the job, the company does not prevent or delay it, except for any security reason. All kinds of information of our employees are protected and kept confidential to the extent specified by law. The same attitude is expected from all our stakeholders who make up our supply chain.

4. Providing Underage Employment (Prevention of Child Labor)

No one under the legal minimum age limit is hired by acting in accordance with the principles and procedures of employing children and young workers within the framework of institutional respect for the protection of children from all kinds of abuse, their healthy development and the right to education. No form of child labor is acceptable. The minimum age determined by national and international laws is taken into account, except for mandatory situations such as interns. In addition, our stakeholders who make up our supply chain are expected to act with the same sensitivity and legal compliance. As one of the criteria for selecting and evaluating suppliers; any illegal employment risk and social compliance of our suppliers are audited through on-site audits, feedbacks, reports and documentation.

5. Working Hours and Wages

Working hours are determined in accordance with applicable laws and obligations, and comply with the weekly and annual overtime limits set by law and customer standards. Overtime wages are paid by calculating the increased wage specified by law; In our practices, wages, working hours, overtime and side payments are carried out in full compliance with applicable laws and employment contracts.

6. Occupational Health and Safety

Our company ensures the creation and maintenance of a safe and healthy workplace environment. By minimizing the risk of our employees being exposed to accidents, injuries and all kinds of health-threatening factors, the company is safe, healthy and efficient. It aims to ensure its continuity by creating a business environment where they can work. In our institution, care is taken to provide a workplace environment free of violence, threats, abuse and disturbing conditions. All occupational health and safety rules regulated by the legal legislation are applied. All the requirements of the ISO 45001 Occupational Health and Safety Management System are implemented at all stages of the organization. The continuity

PREPARED	CONTROLLED	APPROVED
Ayşegül Güneş EYLEMER	Ayşegül Güneş EYLEMER	Alper EROL



Document No:	KEYS-POL-03
First Release Date:	18.03.2020
Revision Date:	04.08.2022
Revision No:	1
Page No:	5/7

and improvements of the management system are ensured through periodic surveillance and document renewal audits.

7. Respect for Freedom of Association and Representation

We recognize all the fundamental rights of our employees, such as association, unionization and collective bargaining stemming from all constitutional and international agreements, and we respect the right to free and democratic representation through employee representatives.

8. Receiving Suggestions, Wishes and Complaints

Methods have been created for each employee to convey their suggestions, wishes and complaints, timely and effective evaluation and feedback are made, and no retaliation is made against the employee's request and complaint notification

With the Klimasan Suggestion Evaluation System, the technical and administrative suggestions of all employees are received under the leadership of the QMS Department and the suggestion is evaluated by the Evaluation Board. As a result of the monthly evaluation, projects and ideas that have been ranked are rewarded and actions are taken to implement them.

With the Wish / Complaint Boxes located within the company, employees can express their wishes and complaints anonymously, and relevant actions are taken for the issues that have been evaluated under the management of the Human Resources Department.

9. Rest Days and Holidays

Our employees use rest and holidays within the framework of their legal rights. Working days vary depending on the nature of the job.

10. Recruitment and Employment

Recruitment and placement activities in our company are carried out by the Human Resources Department. The vacancies determined within the scope of the budget created in accordance with the annual business plans and targets are employed in accordance with the equal work equal pay policy, taking into account the egalitarian approach, legal rights and permissions in accordance with the laws and certain rules, granting fair side rights and opportunities. Career management, training and development

PREPARED	CONTROLLED	APPROVED
Ayşegül Güneş EYLEMER	Ayşegül Güneş EYLEMER	Alper EROL



Document No:	KEYS-POL-03
First Release Date:	18.03.2020
Revision Date:	04.08.2022
Revision No:	1
Page No:	6/7

processes, and performance evaluations of the employed personnel are carried out by the Human Resources Department.

11. Employment Contract

Between our institution and the person to be employed, an "Indefinite Term Employment Contract", which is in accordance with the workplace and the law and includes the conditions offered to the candidate employee, or according to the condition, "Fixed Term Employment Contract" is prepared. The contract and the documents required by the job/institution are signed by the employee who accepts to start the job. A copy of the employment contract is given to the employee in return for signature, and all the rules and practices required by our institution and the job are transferred to the relevant employee through orientation training.

12. Providing Employment for Foreign Employees

Within the scope of our egalitarian approach, all foreign employees, regardless of religion, language, race, status, orientation, gender, are recognized and observed with equal and fair rights. Within the scope of our egalitarian approach, all foreign employees, regardless of religion, language, race, status, orientation, gender, are recognized and observed with equal and fair rights.

13. Prevention of Discipline and Harassment

Based on the peace of the working environment and the happiness of the employees; to respect the dignity and personality of the employees, not to use corporate punishment; not to allow verbal, physical, psychological abuse, pressure, threat or coercion; In order to ensure disciplined work by our institution, the disciplinary rules determined in the "TAL IKY-004 - Disciplinary Board Instruction" are applied. All of our employees carry out their work by acting in accordance with the instructions of the working rules. In our institution, a workplace environment has been provided in which there is no violence, threats, abuse and uncomfortable conditions, and all necessary procedures are being carried out for its continuity, and all necessary studies are being carried out with our Disciplinary Board for the continuity of these studies.

14. Protection Of The Environment

Our environmental impacts that may arise from all kinds of activities are managed with a sense of responsibility. To comply with applicable environmental legislation and standards, customer, environmental aspects and impact assessment based on the environment and to effectively prevent

PREPARED	CONTROLLED	APPROVED
Ayşegül Güneş EYLEMER	Ayşegül Güneş EYLEMER	Alper EROL



Document No:	KEYS-POL-03
First Release Date:	18.03.2020
Revision Date:	04.08.2022
Revision No:	1
Page No:	7 / 7

contamination of a zero-waste management, reducing pollution, conserve natural resources and also to reduce the adverse effects on the environment through efficient energy management by making a corporate culture to improve our current situation are underway.

All the requirements of the ISO 50001 Energy Management System are implemented and followed in all administrative and operational processes under the leadership of the Energy Management Representative, the Energy Board and the QMS Department. Our environmental impacts are monitored with periodic emission and carbon footprint measurements and continuous improvement targets are set. With the Sustainability Report published annually, our environmental development is reported to all our stakeholders. Our Corporate Sustainability Approach guides all our operational and administrative activities and allows for new collaborations with a common purpose. We serve to ensure environmental sustainability with the associations, organizations and organizations we cooperate with.

15. Stakeholder Communication and Transparency

Klimasan makes a commitment to establish bonds with its stakeholders on the basis of goodwill. It treats all its stakeholders fairly and at an equal distance. As Klimasan A.Ş, we aim to provide accurate, timely and necessary information to all our stakeholders and regularly analyze our stakeholders' views and expectations; In this direction, we consider it among our corporate responsibilities to determine our plans, risks, opportunities and targets, to include them in our work and to implement the requirements of being a public company. A transparent stakeholder communication is committed with appropriate communication platforms and communication methods prepared for all our stakeholders.

The social compliance commitments of the suppliers from which we purchase products/services are taken, their capacities are measured with the Corporate Social Compliance and Sustainability Survey, the results are monitored with action plans, and it is aimed to increase the social compliance levels gradually. In addition, our stakeholders are allowed to participate in our Sustainability Management; All our activities related to the Sustainability Report, which we plan to publish every year as of 2020, are shared with our stakeholders.

PREPARED	CONTROLLED	APPROVED
Ayşegül Güneş EYLEMER	Ayşegül Güneş EYLEMER	Alper EROL