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|  | | EFES HAVLU TEKSTİL SANAYİ VE TİCARET A.Ş. CODE OF CONDUCT | |    | |
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At Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. , we are committed to;

- A standard of excellence in every aspect of our business and in every corner of the world,
- Ethical and responsible conduct in all of our operations;
- Respect for the rights of all individuals;
- Respect for the environment

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. commits to comply with the following standards:

Child Labor

The producers will not use child labor.

The term "child" is used for children under 15 (or 14 where local law allows) or if higher, the local legal minimum age for employment or the age for completing compulsory education
Manufacturers who employ very young people who are not covered by the definition of 'children' will also comply with the laws and regulations applicable to such persons.

Involuntary Labour

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will not use any forced or involuntary labour, whether prison,bonded, indentured or otherwise.

Coercion and harassment


Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will treat every employee in a respectful and honorable manner and shall not resort to corporal punishment, threats of violence or any other form of physical, sexual, psychological, or verbal abuse or ill-treatment.

Non-discrimination

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will not discriminate in the employment practices including salary, ancillary benefits, promotion, disciplinary measures / penalties, dismissal or retirement according to employees' race, religion, age, nationality, social and ethnic origin, disability, sexual orientation,political opinion or freedoms and gender.

Association

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will respect the rights of employees to unite, organize, negotiate and bargain collectively in an appropriate, legally and peaceful manner and will not interfere or punish them about this matter.

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Health and Safety

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will ensure that workers are reasonably accessible to a safe and healthy workplace, at least drinking water and toilets, in accordance with all applicable laws and regulations, and will provide fire safety and adequate light and ventilation equipment.

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will also ensure that the same health and safety standards are applied to any housing they provide for employees.

Compensation

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. accepts that the fees are necessary to meet the basic needs of the employees. Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will comply according to law and regulations with all applicable remunerations and hours of work, including wages and other paying matters, overtime, maximum working hours, piece rates and other elements of compensation the very least. They will provide the side payments / benefits required by law.

Except in extraordinary business circumstances, Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will not require employees to work more than lesser (a) 48 hours per week and 12 hours of overtime or (b) the limits on regular and overtime hours allowed by local law or, where local law does not limit the hours of work, the regular work week plus 12 hours overtime. In addition, except in extraordinary business circumstances, employees will be entitled to at least one day off in every seven-day period.

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will compensate employees for overtime hours at such Premium rate as is legally required or, if there is no legally prescribed Premium rate, at a rate at least equal to the regular hourly compensation rate.

Where local industry standards are higher than applicable legal requirements, Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will meet the higher standards.

Protection Of The Environment

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will comply with all applicable laws and regulations concerning the environment

Other Laws

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will comply with all applicable laws and regulations, including those pertaining to the manufacture, pricing, sale and distribution of merchandise. All references to “applicable laws and regulations” in this Code of Conduct

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include local and national codes, rules and regulations as well as applicable treaties and voluntary industry standards.

Subcontracting

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will not use subcontractors for the manufacture of it's customers merchandise or components thereof without it's customers' express written consent, and only after the subcontractor has entered into written commitment with Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. to comply with this Code of Conduct.

Monitoring and Compliance

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will authorize it's customers and their designated agents (including third parties) to engage in monitoring activities to confirm compliance with this Code of Conduct, including unannounced on-site inspections of manufacturing facilities and employer-provided housing, reviews of books and records relating to employment matters, and private interviews with employees. Efes Havlu Tekstil Sanayi ve Ticaret A.Ş. will maintain on site all documentation that may be needed to demonstrate compliance with this Code of Conduct.

Publication

Efes Havlu Tekstil Sanayi ve Ticaret A.Ş will take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to employees, including the prominent posting of a copy of this Code of Conduct, in the local language and in a place readily accessible to employees, at all times.

GENERAL MANAGER