

RESPONSIBLE PROCUREMENT AND SUPPLY CHAIN POLICY

1. PURPOSE

The Responsible Procurement and Supply Chain Policy of SUB IQ YAZILIM ÇÖZÜMLERİ TİCARET LİMİTED ŞİRKETİ (SUB IQ) has been drafted to ensure the sustainability of the raw materials, products, technologies, and services we procure in accordance with national and international standards, and to evaluate, monitor, and promote the alignment of our suppliers' operations and business processes with a sustainability mindset.

2. SCOPE

Our Responsible Procurement and Supply Chain Policy applies to our suppliers, employees, group companies, and business partners. Full compliance with this policy is expected from all employees, especially those responsible for our company's procurement processes, as well as the aforementioned stakeholders.

This policy is considered an integral part of:

- Sustainability Policy
 - Human Rights, Inclusiveness, Diversity, and Human Resources Policy
 - Integrated Management System Policy
 - Ethics, Compliance and Awareness Policy
 - Anti-Bribery and Anti-Corruption Policy
 - Gift Giving and Hospitality Policy
- and other related policies of our company.

3. BEING A SUPPLIER FOR SUB IQ

3.1 Sustainability of Our Procurement Processes

We continuously improve, audit, and manage our processes to provide uninterrupted and sustainable services to our business partners. We analyze potential risks in our supply chain and take preventive measures to eliminate them.

3.1.1 Backup of Machinery, Products, Systems, and Technologies

All machinery, technologies, and software used in production, logistics, raw material procurement, and sales services are backed up against analyzed and foreseeable risks. Machines in our production area operate in at least pairs. Our software, technologies, and critical data are protected under our Information Privacy, Information Security, and Digitalization Policy.

3.1.2 Just Transition Mechanisms and Cross-Training Approach

We regularly assess risks associated with job displacement due to evolving technologies and AI. We aim to continuously enhance our employees' skills and knowledge.

We conduct cross-training programs to prevent disruptions due to health-related absences or other interruptions in supply chains, ensuring business continuity.

Blue-collar workers rotate through all production stages, while white-collar employees are employed in pairs per department for continuity in case of turnover.

3.1.3 Safe Storage and Shipment Practices

We prioritize secure storage. All incoming and outgoing products are logged both digitally and physically.

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Non-compliant products are documented through deviation reports and submitted to the quality and purchasing departments.

Stacking, handling, and placement of products in storage is managed by trained personnel. All processes are periodically audited by our quality department.

3.1.4 Business Continuity Plan (BCP)

We have developed a BCP to ensure uninterrupted operations and effective crisis response.

3.1.4.1 Identification and Analysis

Potential risks are identified collaboratively across departments and evaluated under board supervision, including natural disasters, supply chain disruptions, technology failures, pandemics, etc.

3.1.4.2 Planning and Development

We prepare secondary and tertiary plans and develop them based on changing conditions. Suppliers are categorized as Critical, Approved, and Alternative, with at least two backup suppliers identified.

3.1.4.3 Implementation, Monitoring, and Training

Business continuity disruptions are quickly reported. Related personnel are trained and participate in continuity drills.

3.1.4.4 Legal Compliance, Disasters, Emergencies, and Improvement

We aim to exceed legal standards and regularly conduct joint evaluations during crises, with ongoing improvements guided by the Business Continuity Team.

3.1.4.5 Maintenance and Testing

All equipment is routinely inspected to prevent failures, including secondary machinery. Emergency plans are regularly tested.

3.1.4.6 Insurance and Stakeholder Collaboration

We maintain business interruption insurance and cooperate with customers, suppliers, and auditors to minimize disruption effects.

3.1.4.7 Safety Stock Monitoring

We stock extra inventory based on past data and customer forecasts. Stock levels are monitored and replenished as they approach critical thresholds.

4. BEING A SUPPLIER TO SUB IQ

4.1 Communication with Our Suppliers

We maintain fair, transparent, and impartial communication. We support continuous improvement of supplier operations and expect them to operate ethically and responsibly, particularly in labor rights, environment, climate, and biodiversity.

4.2 Principle of Integrity and Transparency

We prioritize ethical business conduct in all supply chain activities, promoting cooperation toward positive environmental and social impact.

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4.3 Quality Management and Sustainable Procurement Principle

We expect suppliers to comply with Sustainable Procurement principles and legal obligations, establish Quality Assurance Systems, and align with our policies.

4.4 Respect for Human and Labor Rights

We demand compliance with the UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, OECD Guidelines, and ILO standards regarding child labor, forced labor, discrimination, and harassment.

4.5 Respect for Nature and the Environment

We expect environmental compliance and proactive efforts to calculate and reduce carbon/water footprints. Suppliers are encouraged to work with our Sustainability Committee and contribute to Net-Zero and 1.5°C Global Temperature Increase Goals.

4.6 Anti-Bribery, Anti-Corruption, and Conflict of Interest

We follow a zero-tolerance policy. Suppliers involved in such activities will be disqualified. They must comply with all relevant ethical and anti-corruption policies. Violations should be reported to our Ethics Committee at ethics@subiq.com.tr.

4.7 Supplier Data Confidentiality Principle

Supplier data is protected under our Information Privacy, Information Security, and Digitalization Policy. Suppliers must also protect our data and report any cyber incidents immediately.

4.8 Performance Monitoring and Improvement Approach

We expect suppliers to cooperate with internal audits and sustainability assessments and to work toward the UN Sustainable Development Goals (SDGs). We also encourage participation in international sustainability platforms (e.g., EcoVadis, Refinitiv).

4.9 Supplier Selection Process

Suppliers must complete the required evaluation forms. Preference is given to suppliers with sustainability certifications, performance tracking, and high compliance with our ESG and policy requirements.

Date: 01.01.2025

Chairman of the Board of SUB IQ: Yusuf Yigit AKKUŞ



Signature: