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Medepsilon Ltd. Code of Conduct for suppliers and their subcontractors

The requirements of the Medepsilon Code of Conduct are in conformity with the Business Social Compliance Initiative (BSCI) and are based on the ILO Conventions, UN Declaration of Human Rights, UN Conventions on children's rights as well as on the abolition of all forms of discrimination against women, UN Global Compact and the OECD Guidelines for multinational enterprises. This Code of Conduct defines minimum standards. The business partners of Medepsilon Ltd. must assure that the Code of Conduct will also be respected by all subcontractors who are involved in the production process.

The Medepsilon Code of Conduct adheres to national and international laws and agreements.

Scope

This Code of Conduct forms the basis of all business relationships in concern of national and international production processes and manufacturing facilities who are involved in the production of the items which are purchased by Medepsilon Ltd. This is also incumbent for direct Medepsilon business partners as well as for each company that is commissioned by them in connection with Medepsilon products (hereinafter referred to as "business partners"). The business partners assure and are responsible for the introduction, the acceptance and the compliance with the principles mentioned in this Code of Conduct.

Compliance with laws

The business partner undertakes to comply with all valid laws and regulations, industrial minimum standards, ILO and UN conventions and all other relevant legal ordinances.

He must apply the rules with the strictest requirements. These rules may not be circumvented by concealment measures.

Social responsibility

Ban of child labour and employment of juvenile workers

Any form of exploitation of children is prohibited. Employment relationships and working conditions which are like slavery or harm the health of children are also prohibited. In the cases where children are working in situations which meet the definition of child labour according to the international ILO standards, the business partner shall implement and document measures and procedures that provide remediation for the working children. The rights of juvenile workers must be protected. Furthermore, the business partner provides appropriate financial and other support for such children to enable school attendance, if they are in child age. The business partner may employ children, but only outside school hours if mandatory school laws apply to the juvenile workers.

Such an employee is allowed to work only for ten hours, including school hours, work hours and travel time. A juvenile employee may not work longer than eight hours a day and not at night.

[ILO Conventions 10, 79, 138, 146, 142, 182; 5th UN Global Compact Principle]

Ban of forced and duty labour and disciplinary actions!

Any form of slavery, slavery-like practices and forced labour, e. g. the withholding of ID cards of employees at the start of employment and prison labour, which violates basic human rights, are prohibited. Every human being has the right to choose his work freely and the working conditions must comply with national laws and practices. Moreover, the employees have the right to leave their workplaces at the end of the working day or to terminate their employment considering the notice period. Furthermore, the business partner must treat his employees with dignity and respect and must not coerce them psychologically or physically. Torture, physical punishment, and verbal abuse are prohibited.

[ILO Conventions 29, 105; 4th UN Global Compact Principle]

Freedom of association and collective bargaining

The employees have the right to form, to join and to leave a trade union, as well as to collectively bargain in its name with the business partner. This right must be respected and complied with by the business partner. In addition, the business partner shall not retaliate against workers who are in trade unions. In countries where freedom of association and collective bargaining are limited by law, the business partner allows the employees to elect a representative who may not be discriminated, harassed, threatened or intimidated by the business partner. The representative must have access to the workplaces of his co-workers. [ILO Conventions 11, 87, 98, 135, 143, 154; 3rd UN Global Compact Principle]

Working hours

The working hours of employees are in accordance with national laws and industry standards as well as the relevant ILO conventions. The weekly working hours shall be in accordance with the respective national legislation, but shall not regularly exceed 48 hours and shall not exceed 12 hours of overtime in one week. Overtime may only be done voluntarily and shall be compensated with a surcharge. After six working days in a row, the employee is entitled to a day off before returning to work. In cases where overtime is



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necessary to meet a short-term demand of the company, and where the business partner has signed a freely negotiated agreement with employee organizations representing many of the employees, the company can request more overtime to meet the demand. [ILO Conventions 1,14]

Ban of discrimination

Every employee has the right to be treated equally and to have the same opportunities in the company as everyone else. No employee shall be discriminated against in hiring, compensation, access to training, promotion, termination of employment or retirement based on sex, age, religion, racial discrimination, caste, birth, social background, disability, ethnic or social origin, nationality, political memberships or views, membership in employee organizations, sexuality, family responsibilities, marital status or any other condition. Discrimination by business partners will not be tolerated. [ILO Conventions 100, 110, 111, 143, 158, 159, 169, 183; 6th UN Global Compact Principle]

Remuneration

The wage level of the business partner should correspond to the legal minimum wage or industrial standards, if possible, even exceed them. It is prohibited to deduct wages illegally from the employee or as a punishment measure. In cases where the legal minimum wage doesn't exist or is insufficient to cover the cost of living, the business partner is encouraged to pay a reasonable wage that covers the basic needs. The business partner guarantees that the employees will receive detailed information about the composition of their wages or salaries. The employee shall receive a suitable remuneration regarding the employment. In addition, overtime shall be remunerated with legally defined bonus. If this is not regulated by law, the business partner shall define it, at least at the level of industry standard. The business partner chooses the model which is more advantageous for the employee. [ILO Conventions 12, 26, 29, 101, 102, 131]

Health and safety at work

The business partner must ensure a safe and hygienic working environment and introduce preventive measures to avoid accidents and situations in the workflow which are harmful to health. Furthermore, rules for ensuring health and safety at the workplace shall be established and followed. In particular, high value is set on the provision and the use of protective equipment and on access to clean toilets and drinking water. The business partner shall regularly train his employees on safety measures and health protection at the working place. The business partner has the duty of care for the safety and cleanliness of the worker accommodations provided by him to his employees. The conditions in these accommodations must be in accordance with human rights. Each employee may get to safety immediately in a hazard situation. Juvenile workers must not be employed in jobs that are harmful to their health or unsafe. [ILO Conventions 155, 164, 184, 190]

Complaint mechanisms

The business partner is responsible at facility level for establishing an effective complaint mechanism for individuals and communities who may be affected by negative impacts.

Dealing with conflict materials

For the conflict materials tin, tungsten, tantalum and gold, as well as for other raw materials such as cobalt, the business partner establishes processes in accordance with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk-Areas and expects his suppliers to do the same.

Smelters and refiners without adequate, audited due diligence processes should be avoided.

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk-Areas]

Environmental Responsibility

Environmental protection

The business partner must comply with all existing environmental regulations. In addition, he shall initiate measures that reduce and prevent pollution. Waste management, handling of chemicals and other hazardous substances and their disposal, the number of emissions and wastewater treatment must at least meet or exceed legal standards. Furthermore, the consumption of raw materials and natural resources must be avoided or reduced.

The business partner promotes environmentally friendly technologies and motivates, informs, and trains his employees in accordance with their duties with regards to environmental protection.

The business partner shall comply with the prohibition of unlawful taking when acquiring, constructing, or otherwise using land, forests, and waters. [OECD Guidelines for multinational enterprises Chapter 6]



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Treatment and discharge of industrial water

Wastewater from operations, manufacturing processes and sanitary facilities shall be typed, monitored, inspected, and treated as necessary prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

Dealing with air emission

General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be typed, routinely monitored, verified, and treated as necessary prior to release. The business partner is also responsible for monitoring the emission control systems and is required to find economical solutions to minimize any emissions.

Handling waste and hazardous substances

The business partner follows a systematic approach to identify, handle, reduce and responsibly dispose or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.

The business partner undertakes to act in accordance with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. [Basel Convention]

Reduce consumption of raw materials and natural resources

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced, or avoided. This is done either directly at the point of origin or through processes and measures, for example by changing production and maintenance processes or procedures in the company of the business partner, by using alternative materials, through savings, through recycling or with the help of the reuse of materials.

Dealing with energy consumption/efficiency

The business partner shall monitor and document the energy consumption. Ecological and sustainable solutions shall be found to improve energy efficiency and minimize energy consumption.

Ethical business conduct

Bribery and corruption

Bribery and corruption are not tolerated in any way. The business partner shall comply with all international and national laws on bribery and corruption and implement principles to prevent and fight bribery and corruption. The business partner and his employees shall not accept any financial means or objects given with the intention of a third party to favor the third party or to refuse another, from which the business partner could incur a sense of obligation towards the third party. Particularly in countries where it is part of etiquette or culture to give gifts to business partners, special attention should be paid to this sense of obligation. [OECD Guidelines for multinational enterprises Chapter 7; 10th UN Global Compact Principle]

Fair competition

The business partner shall comply with the standards of fair business, fair advertising, and fair competition. In addition, the applicable antitrust laws must be applied, which prohibit agreements and other activities that influence prices and conditions when dealing with competitors.

Furthermore, these regulations prohibit agreements between customers and suppliers that are intended to restrict customers' freedom to determine their prices and other conditions autonomously when reselling.

[OECD Guidelines for multinational enterprises Chapter 10]

Intellectual property and data protection

The business partner shall respect the applicable laws on data protection and intellectual property rights. Technology and know-how transfer must be carried out in such a way that intellectual property rights and customer information are protected.

Avoidance of conflicts of interest

The business partner makes business decisions solely on the basis of factual criteria and is not influenced by personal interests and relationships.

Import and export controls!

When importing and exporting goods and services, the business partner shall comply with all valid and applicable laws.



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Money laundering and terrorist financing

The business partner shall maintain relationships only with those business partners of whose integrity he is convinced. He must ensure that the applicable legal provisions against money laundering and terrorist financing are complied with. [40 FATF Recommendations (Financial Action Task Force)]

Implementation

Management systems

The business partner shall establish a social responsibility policy and develop plans for its implementation so that all minimum legal standards and all requirements of the Medepsilon Code of Conduct are met. The management is responsible for ensuring that the Code of Conduct is implemented correctly, and that implementation is continuously improved. It is also responsible for informing workers of the requirements of the Code of Conduct, taking corrective actions in the event of grievances and verifying compliance with the Code of Conduct.

This Code of Conduct must be clearly displayed in the relevant language and freely accessible to all employees of the business partner. The Code of Conduct must be explained verbally to people who cannot read.

Medepsilon Ltd. reserves the right to take appropriate measures against business partners who do not meet these requirements, which may ultimately lead to the suspension or termination of the supply relationship.

Acknowledgement and consent of the business partner

We, the undersigned, hereby confirm that we have received and taken detailed note of the Medepsilon Code of Conduct, accept it and will comply with it in its entirety without amendment. In addition, we allow Medepsilon Ltd. or third parties commissioned by it to verify compliance with the principles described in this Code of Conduct in our company. Complaints and information about violations of the Code of Conduct are passed on to Medepsilon Ltd. at any time and anonymously. Author: S. Bürkler / EK Date: 25.04.2023 Controller: Arya Tumen / CEO Revision: 1.0 Approver: Bayhan Gülerhan / EK

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Place, Date Signature:

.....
Name Company, Stamp:

Behalf of Medepsilon, Mr. Bayhan Gulerhan (CEO of company)

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