

SEMTRIO EĞİTİM VE DANIŞMANLIK HİZMETLERİ A.Ş.

SUSTAINABLE PROCUREMENT POLICY

1. OUR VISION

Our vision is to work with suppliers, business partners, customers, and stakeholders who act with the same awareness and direction, as well as organizations' social and ethical business practices, awareness of environmental impacts, and positive steps taken in these areas.

2. OUR MISSION

Semtrio, as a company that provides sustainable living and business practice consultancy to organizations, measures its environmental, social, and governance impacts and, most importantly, has adopted the basic principle of reflecting these values in its supply chain and setting an example. Sustainability is the cornerstone of Semtrio's foundation, and its primary mission is to observe and develop this awareness at every step in its procurement processes.

3. OBJECTIVE

Semtrio is deeply committed to creating sustainable value together with its stakeholders. It aims to establish fair, impartial, and transparent business relationships with all suppliers, customers, and business partners. The company identifies social, economic, environmental, and ethical risks in its supply chain and aims to partner with companies that comply with the basic rules of conduct expected from its purchasing operations and business partners, have environmental sensitivity, are conscious of social responsibility, respect human rights, provide fair working conditions, act with the principle of diversity and inclusion, and have high standards in areas such as ethical business practices and positive impact on its own supply chain in order to create a sustainable and responsible supply chain. It considers criteria such as accessibility, physical proximity, quality and variety of the product supplied, price performance, and the supplier's corporate structure. In this context, supplier selection criteria include long-term and sustainable partnerships with companies that comply with relevant guidelines and standards.

Semtrio integrates a sustainable procurement approach into companies that play an important role in the international supply network and provides support to its external stakeholders as well as its own business processes. While Semtrio provides services such as corporate sustainability consultancy, environmental footprint monitoring and awareness raising to its clients, it emphasizes these values and supports them to adopt sustainable business practices. In this way, it has an impact on every step of the supply chain and plays an important role in raising this awareness in organizations and individuals.

4. SCOPE

Candidates who want to become a business partner of Semtrio. go through the "Supplier Evaluation" process. Within the scope of this process, suppliers are evaluated from the perspective of the Sustainable Procurement and Responsible Purchasing Policy.

This policy applies to the suppliers, stakeholders, customers, and business partners with whom Semtrio cooperates within the framework of all its activities.

Semtrio has the right to terminate/stop the procurement and business relationship contract in case of violation of issues that do not belong to our policy and perspective, for which we have zero tolerance.

5. SOURCE

Our company policy is aligned with B-Corp (Benefit Corporation) and the United Nations Global Compact (UNGC), which are globally-recognized standards in the fields of sustainability and corporate responsibility. B-Corp is a comprehensive certification system that evaluates the social and environmental performance, transparency, and accountability of companies. By meeting high standards in this assessment process, our company has proven its commitment to ethical business practices, environmental responsibility and the benefit of society. Furthermore, by complying with the UNGC's ten principles in the areas of human rights, labor standards, environment and anti-corruption, and business ethics, we demonstrate that we adopt sustainable and responsible business practices on a global level. This reflects our company's dedication and commitment to creating social and environmental impact both locally and globally.

Semtrio supports ways of working that comply with all national and international standards and legislation below, including:

- UN Global Compact,
- UN Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Sustainable Development Goals
- World Economic Forum, 2015

6. RESPONSIBLE PERSONS, MONITORING AND REVIEW

This policy was created with the participation of Semtrio's Sustainable Trade Committee, employees, and stakeholders and is reviewed every year. It is updated by the Sustainable Trade Committee, which has duties such as following the changes in legislation, keeping the supplier risk analysis up to date and ensuring its follow-up, verifying compliance with international standards, and working according to the principles of the supplier code of conduct. All Semtrio employees and managers act in accordance with this policy and provide our suppliers, customers, and business partners with the necessary information, guidance, and follow-up regarding compliance with this policy. The applicability of the policy, actions taken, performance targets, and compliance processes are examined by communicating with customers, suppliers, and employees, and necessary revisions are made to make it most effective.

SUSTAINABLE TRADE COMMITTEE
CEO
Climate Solutions Director
Sustainability Solutions Department/Climate Solutions Department - Project Manager
Accounting Department
Purchasing and Administrative Affairs Executives
Sales and Business Development Executives

With its responsible procurement and sustainable purchasing practices, Semtrio sets out with goals such as protecting brand value, setting standards in the supply chain and keeping the chain cohesive, exploring new markets, making local purchases, and raising awareness of important social issues. It first subjects the company with which it will establish a business relationship to supplier evaluation criteria. Semtrio maintains business relations with companies that it confirms comply with these criteria and codes of conduct. It expects 90% or more of all business relationships to comply with the supplier code of conduct fully. The company also meets with the procurement departments of the companies in its supply chain and ensures continuous internal monitoring. It also expects its suppliers to comply with the guidelines in the policy and the supplier code of conduct and to establish their operations and fields of activity in this direction.

In doing so, by setting an example for suppliers and business partners in more sustainable endeavors, Semtrio is:

- Complying with the economic, environmental, and ethical laws and regulations of the country in which we operate,
- Promoting the highest standards of economic, social, ethical, and environmental practices,
- Prioritizing the identification and management of risks associated with our procurement process, and
- Complying with all the basic requirements, such as communicating our policy and perspective with stakeholders (internal and external) and raising awareness.

7. IMPLEMENTATION AND BASICS

This policy has been developed in recognition of the diversity and different characteristics of Semtrio's suppliers. Semtrio expects the practices to be in accordance with the characteristics of the supplier and to be shaped according to the standards. Semtrio requires its suppliers to comply with this policy and closely follow the processes. Semtrio states that it will cooperate for the solution of policy violations and that all relevant parties are responsible for the implementation of the policy.

7.1. Environmentally Sustainable Procurement Principle

Semtrio is one of the most successful representatives of its field with its sustainability consultancy services to institutions, environmental training for the benefit of society and institutions, environmental footprint calculations such as water and carbon footprint, creation of science-based future targets, product life cycle processes, and providing environmental, social and economic perspectives on sustainability. Semtrio expects institutions and organizations in the supply chain to carry out holistic studies on the climate crisis, environmental footprint, greenhouse gas emissions, adaptation to innovative and low-energy technologies, etc. It encourages, controls, and ensures their implementation. It expects all its large-scale suppliers to work within the framework of these standards.

Semtrio aims to provide training to its customers on environmental footprint, monitoring, and reduction and thus contributes to the environmental awareness of individuals and institutions. It aims to provide high standards of service quality in the environmental consultancy processes it provides. At the same time, it endeavors not to make product and service expectations from its suppliers that may cause environmental violations. Semtrio expects its suppliers to play an active role in carbon footprint calculations and contribute to the reduction of Scope 3 emissions.

- Having an environmental management system and integrating it into all business practices.
- Acting in accordance with the laws and environmental legislation, having an awareness of waste management, regularly sorting waste, collecting it according to the relevant legal regulations, and sending it to recycling services
- Eliminating the use of harmful chemicals and eliminating risk at source
- Adopting renewable energy and process optimization practices
- Producing and using environmentally friendly products and expecting the same from their supply chains in their purchasing practices
- Developing practices to control greenhouse gas emissions and wastewater generation
- Providing regular training to employees to raise awareness on combating climate change
- Emphasizing waste reduction, the widespread use of sustainable resources, and carbon offsetting/reduction practices as of primary importance
- Having a perspective on protecting all living species, especially endangered and endemic species, and acting accordingly
- Concentrating on preventing land degradation, and protecting natural ecosystems, and continuously improving and developing them
- Protecting biodiversity and changing our impacts on ecosystems in sustainable ways
- Protecting and utilizing the forests and biodiversity of our suppliers in industries such as paper, cardboard, etc., which utilize nature as a raw material source, in accordance with the law and with a sustainable perspective
- Making recycling awareness a part of the culture and protecting and using the forests and biodiversity of our suppliers in industries such as forestry and biodiversity in accordance with the law and with a sustainable perspective

7.2. Sustainable Procurement Principle for Labor Practices and Human Rights

Semtrio encourages its suppliers to provide working conditions in accordance with human dignity, to actively participate in practices that prioritize occupational and public health and safety, and in training and awareness-raising activities and expects them to demonstrate full compliance with these ethical standards.

Semtrio aims to provide training on sustainable procurement practices to all its employees in units such as sales, business development, project management, administrative affairs, and accounting, who play an active role in sustainable procurement and supply practices. At the same time, the company has created a systematic, active, and effective request/complaint Ethical Hotline mechanism and ensures that the requests and complaints received through these methods are resolved in the most appropriate, fastest, and ethical manner. Semtrio aims to provide human rights and labor training to 100% of its suppliers by 2026, increasing every year.

- Complying with international standards and targets, such as ILO (International Labor Organization), UNSDGs (United Nations Sustainable Development Goals), etc., and establishing working conditions (working hours, salaries, leave entitlements, etc.) in line with workers' and human rights
- Not creating any form of unethical practices such as slavery, human trafficking, bribery and corruption, use of money of unknown origin, fraud, betting, etc., in the working order and business relations
- Adopting a fair, livable, and equal work, equal pay policy
- Providing decent working conditions with ideal occupational health and safety measures and decent working conditions for its employees, respecting human rights, and aiming to prevent possible occupational accidents by reducing or minimizing the risk
- Having a positive impact on their own supply chains and working with suppliers who adopt ethical working practices, respect human rights, and have environmental awareness
- Respecting ethnic and cultural differences and taking measures to protect them, adopting the principle of equal opportunity, and creating a working environment that values human rights without discrimination in terms of religion, language, race, gender, age, political opinion, disability, union membership, etc. in processes such as recruitment, promotion, and termination of employment
- Not tolerating any form of harassment, violence, and abuse, and not tolerating forced or compulsory labor; respecting freedom of association
- Providing regular training to employees on issues such as social compliance perspective, environmental processes, and occupational health and safety measures, and raising continuous awareness
- Not using child labor and practices in any of their operational processes
- Upholding the commitment to adhere to the supplier code of conduct
- Verifying business practices with 3rd party audit institutions when deemed necessary

7.3. Compliance with Ethical Laws

Semtrio conducts its business activities transparently within the framework of honesty, compliance, and high ethical & moral norms. Semtrio is aware that compliance with ethical standards is an indispensable criterion for sustainable and continuous business relationships. In this respect, the company expects its suppliers to share this responsibility while assuming leadership in their business activities. The following principles will be taken into consideration within the scope of the procurement policy:

- Making accurate and timely payments, adhering to invoice terms and contracts, and complying with the law
- Avoiding unethical practices such as breach of confidentiality and non-protection of personal data, bribery and corruption, fraud, money laundering, conflicts of interest, and unfair competition, and report any such situation as soon as possible
- Not offering any privileges or demands at any stage of the business relationship with Semtrio that would undermine the impartiality of the business relationship
- Expecting employees to be trained in ethical business practices

7.4. Inclusive Procurement Practices

Semtrio is committed to inclusion and equal opportunity as a fundamental component of its sustainable procurement approach. No discrimination is allowed in supplier selection processes; no prejudice is shown against suppliers on the basis of gender, ethnic origin, age, disability status, geographical location or any similar discrimination.

In line with our inclusive procurement approach, we actively support the participation of businesses representing diversity in the supply chain, such as women entrepreneurs, businesses belonging to minorities and vulnerable groups, and companies owned by individuals with disabilities. Accordingly,

- In our supplier evaluation system, data on the ownership structure and diversity criteria of suppliers are systematically collected and recorded,
- In the evaluation of supplier candidates, businesses with ownership diversity and inclusion goals are prioritized, and visibility of the relevant categories is ensured in the selection process,
- Internal operational procedures clearly define access and collaboration processes with companies that support local and socially disadvantaged groups,
- The inclusive supplier approach is reviewed annually, and supplier diversity indicators are monitored in our sustainability reports.

8. TARGETS

8.1. Qualitative Targets

- We aim to maintain long-term partnerships with organizations that uphold ethical values, transparency, and social responsibility in supplier relations and that report their sustainability goals transparently.
- One of our key priorities is to work with suppliers who embrace environmental goals such as zero waste and net zero, and who have clear policies and commitments for managing their environmental and social impacts.
- In supplier selection, we are committed to prioritizing businesses owned by women, minorities, and vulnerable groups, as well as suppliers that support goals related to diversity and inclusion.
- All suppliers, customers, and business partners are expected to provide written confirmation that they have read and understood the Semtrio Supplier Code of Conduct. This ensures full alignment with ethical principles across the supply chain.
- We uphold a zero-tolerance policy in line with international standards on issues such as child labor, discrimination, harassment, and irreversible environmental harm; relationships with customers found to be involved in such violations are suspended.
- As part of our corporate sustainability consulting processes, we provide access to third-party evaluation mechanisms that track clients' environmental and social performance. These tools are also used as indirect monitoring instruments to raise awareness in the supply chain.
- We conduct site visits with selected business partners to observe their environmental and social awareness firsthand and to identify areas for improvement as part of our supplier risk management strategy.
- Customers and business partners with high sustainability performance and certifications such as ISO14001, ISO45001, B-Corp, EcoVadis, SMETA (SEDEX) are encouraged, and a value-based approach is brought to collaborations.
- We consider it a corporate responsibility to provide training on sustainable procurement standards to all business units that engage directly with suppliers and customers.

Approved by CEO

İlker Turan
CEO

Title	Related Material Topic*	Target Definition	Target Setting Year	Target Year
Awareness Training	- Responsible and Sustainable Supply Chain Management, - Career Management	Continue delivering sustainable procurement training to 100% of employees in all departments that engage directly with suppliers, including sales, business development, and procurement**	2024	2026 and annually thereafter
Rate of Suppliers Participating in Training	Responsible and Sustainable Supply Chain Management	Increase the percentage of suppliers participating in annual sustainability trainings to over 60%	2024	2030
Number of Suppliers Subject to Corrective Action	Responsible and Sustainable Supply Chain Management	Implement improvement plans for at least 40% of suppliers identified as medium- or high-risk based on risk analyses.	2024	2030
Rate of Suppliers Belonging to Vulnerable Groups	- Responsible and Sustainable Supply Chain Management - Diversity, Equity, and Inclusion (DEI)	Increase the proportion of businesses owned by women entrepreneurs, minorities, and vulnerable groups within the total supplier base by 10%	2024	2030
Rate of FSC-Certified Suppliers	Responsible and Sustainable Supply Chain Management	Raise the percentage of office equipment suppliers with FSC certification to 90%	2024	2026
Rate of Sustainable Procurement	- Responsible and Sustainable Supply Chain Management, - Climate Change	Increase the share of recycled, low-emission, and environmentally certified products to 30% of total procurement volume	2024	2030
Rate of Local Suppliers	Responsible and Sustainable Supply Chain Management	Increase the proportion of local suppliers by 5% (Base year: 2024)	2024	2030
Supplier Code of Conduct Signatures	Responsible and Sustainable Supply Chain Management	Ensure the continued inclusion of the Supplier Code of Conduct, signed with senior management approval, in 100% of supplier contracts **	2024	2026 and annually thereafter
Rate of On-site Visits	Responsible and Sustainable Supply Chain Management	Continue conducting on-site visits for at least 25% of suppliers identified through the risk assessment by 2026.**	2024	2026

* Our Material ESG Topics are disclosed in our 2023-2024 Sustainability Impact Report.

**The relevant targets were successfully met in 2025. The related initiatives will continue to be implemented to maintain and further enhance sustainability performance.

Approved by CEO

İlker Turan
CEO