

COMPANY'S CODE OF CONDUCT

All companies providing goods and/or services to Trendyol Group as well as sub-contractors thereof, sellers, consultants, business partners and other providers of goods and services engaged in commercial activities ("**companies**") fall within the scope of Trendyol Group company's Code of Conduct ("**Company's Code of Conduct**"). Company's Code of Conduct has been prepared for the purposes of presenting Trendyol Group's expectations in terms of ethical behaviour of its companies in the supply chain.

Companies are independent individuals or establishments and as Trendyol Group, we are aware of the independence of our companies. That said, the acts of companies could significantly affect and/or reflect on Trendyol Group's reputation and/or brand. In this respect, Trendyol Group expects all companies and their employees, representatives and sub-contractors to comply with the Company's Code of Conduct while conducting business with and/or acting on behalf or for the benefit of Trendyol Group.

None of the provisions set forth under the Company's Code of Conduct can be revoked by special provisions relating to the same subject matter and foreseen under any agreement or document constituting an annex to an agreement.

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1.LEGAL OBLIGATIONS

Our general rule is for our companies to comply with national and international laws and other legal regulations in all of their activities while conducting business with and/or acting on behalf of and/or for the benefit of Trendyol Group. In case any requirement foreseen under the Company's Code of Conduct is in conflict with any national law of a country or region, the provisions under the law shall prevail.

Our rules pertaining to anti-corruption and anti-bribery are in compliance with the anti-corruption and anti-bribery laws in force in various countries across the globe and adopt a strong attitude against corruption and bribery. We also expect our companies to adopt the same attitude and to have zero tolerance for corruption or bribery. Bribe, fraud, tip, illegal payments and any gifts of value that may provide any unfair and/or improper advantage for or inappropriately affect a public official, Trendyol Group employee or customer cannot be offered. It is the duty of all our companies to comply with local and international laws, legal regulations and ethical standards prohibiting bribery and corruption.

Competition laws promote fair competition and protect sellers and consumers from unfair trade practices. Trendyol Group acts in compliance with all applicable anti-trust and competition laws. All of our companies are also obligated to treat customers, companies, competitors and other third parties fairly.

The Parties comply with the sanctions/restrictive measures and export control laws (including OFAC, EU, UN, UK and UAE), rules, regulations or other requirements applied by any government agency or organization, take the necessary measures and control the necessary sanctions while performing the services as of the date of signing this contract. The Parties accept that Trendyol will be informed immediately in case of any non-compliance and in such a case, the contract may be terminated unilaterally by Trendyol Group.

* This document has been applied to DSM Grup Danışmanlık İletişim ve Satış Ticaret A.Ş. ("DSM") and group companies (group company refers to companies whose shares are directly or indirectly owned by DSM at least 50%, and in this document, DSM and its group companies will be collectively referred to as "Trendyol Group") of DSM. The term "Trendyol Group" in this document refers to DSM, Trendyol Group or one or more group companies according to the relevant supply relationship.

2.EMPLOYEE'S RIGHTS

Trendyol Group respects and supports universal human rights rules. Trendyol Group also expects all companies to fulfil their obligation to respect human rights in our entire value chain from their own employees to companies and the societies we live in and work with.

All companies are obligated to conduct and fulfil employment practices in accordance with applicable legal regulations.

Trendyol Group does not accept child labour. Our companies must comply with all local laws and requirements concerning the minimum working age, refrain from using child labour and adopt all necessary preventive measures so as to ensure that no individual under the legal working age is employed.

Companies should use voluntary labour. Companies cannot use any type of forced labour including forceful services provided in exchange for bonds or debts. Use of illegal workers for the production of any goods or services for Trendyol Group is unacceptable.

We take steps to ensure the absence of slavery, servitude, forced or compulsory labor, human trafficking, child labor, debt bondage, and deceptive labor recruitment (collectively known as "Modern Slavery") in any part or area of our business. We take necessary precautions for this situation to not happen which can be called a modern slavery. We secure delicacy in our business relationships and realise that it will result in sanctions and immediate termination in which situations that the required sensibility is not shown. Trendyol commits to respect human rights in accordance with the Universal Declaration of Human Rights and International Labor Organization. (ILO)

We expect our companies not to tolerate any discrimination based on any attribution such as age, gender, race, ethnic background, gender identity, national origin or religious beliefs. Similarly, we also do not tolerate any practice violating human rights including but not limited to harassment, abuse, physical punishment and threats. All employees should be treated respectfully and in a honourable manner. Under no circumstances will we tolerate any person to be subjected to degrading or bodily harm, physical, sexual, physiological or verbal abuse by our companies. Additionally, we expect our companies to engage in respectful communication with all individuals.

3.SOCIAL RIGHTS

The salaries of employees should be paid regularly and in due time. Our companies should comply with the applicable legislation in terms of paying their employees the salaries they are entitled to receive.

All laws concerning working hours and overtime work should be respected. Overtime work should be on a voluntary basis and carried out in accordance with applicable laws.

Employees should be entitled to any type of paid leave to which they are legally entitled to and such rights should be granted in a lawful manner.

4.HEALTH AND SECURITY

We expect our companies to fulfil any and all occupational health and safety standards foreseen under the local legislation and ensure a safe and healthy workplace for their employees, employees working in their facilities and buildings, contractors and visitors. Trendyol Group disapproves non-equipped work environments, dangerous equipment or unsafe buildings. Our suppliers are expected to adopt necessary health and safety measures concerning their employees and fulfil their legal obligations.

We expect our companies to promptly notify Trendyol Group with respect to any health and safety incidents taking place while providing services or delivering goods to Trendyol Group or a customer of Trendyol Group.

Companies should work proactively in order to prevent any occupational accidents at the workplace that may harm their employees, make notifications with respect to all legal legislation concerning occupational health and safety and adopt other measures. As independent employers, companies are required to provide their employees with mandatory occupational health and safety trainings.

5.ENVIRONMENT

Our companies should comply with all environmental laws and regulations applicable in the countries where they operate and obtain and maintain the relevant environmental permits and licenses in respect of their activities.

In order for any chemicals being used to be acceptable in all countries, such shall comply with RSL ("**Restricted Substance List**").

6.SUPERVISION AND PRACTICE

Trendyol Group expects all of its suppliers to abide by the Company's Code of Conduct and actively use all reasonable efforts to attain the aforementioned standards.

All companies are obligated to inform Trendyol with respect to any product and/or service produced for Trendyol Group. If requested by Trendyol Group, suppliers shall allow their workplaces, facilities and/or relevant units to be subjected to ethical audits in terms of compliance with the Company's Code of Conduct. We reserve the right to visit any units producing goods and/or services for Trendyol Group at any time without notice. Furthermore, we reserve our right to appoint an independent third party chosen to conduct an audit for the purposes of assessing compliance with the Company's Code of Conduct. Companies are required to allow access to facilities, relevant units as well as documents and information relating to the matter during regular and/or unannounced audits. Moreover, we expect our companies to be transparent and refrain from any acts that may mislead the requests and questions of our auditors.

Trendyol Group's audits aim to identify any gaps between the requirements under the Company's Code of Conduct and de facto practices and conditions at the workplace. Any reluctance to cooperate or violation of the Company's Code of Conduct and/or local laws may cause the suspension and/or termination of the commercial relationship between the parties.

7.NO THIRD PARTY RIGHTS

The Company's Code of Conduct does not confer and/or cannot be interpreted so as to confer any rights to 3rd parties. The company's employees do not have any rights against Trendyol Group by virtue of the Company's Code of Conduct and such employees are not entitled to force Trendyol Group to enforce the provisions under this Company's Code of Conduct. The decision pertaining to any such act is reserved by Trendyol Group and is entirely at Trendyol Group's discretion.

8.ETHICAL LINE

All companies are expected to promptly notify Trendyol Group with respect to any known violation of the Company's Code of Conduct. Any potential violation of the Company's Code of Conduct can be notified to Trendyol Group (etik@trendyol.com) at any time either anonymously or by providing their name. Trendyol Group does not tolerate any negative behaviour or retaliatory acts against individuals notifying a potential violation.