***February 2016***

***The ENTERPRISE-TURKEY Code of Conduct,*** in conjunction with ***The ENTERPRISE-TURKEY to Business Conduct,*** outlines the minimum requirements and expectations for the ethical behavior of ***ENTERPRISE-TURKEY*** suppliers.

These standards apply to all suppliers of goods and services to any ***ENTERPRISE-TURKEY*** supplier or buyer (collectively “suppliers or buyers”), regardless of location. Upon delivery of any good or service to ***ENTERPRISE-TURKEY*,** all suppliers certify that they comply with the policies and standards contained in this Code of Conduct.

***ENTERPRISE-TURKEY*** shall have the right at any time and will from time to time evaluate, audit and inspect (or have a third party evaluate, audit and inspect) supplier’s facilities, books and records to assure compliance with this Code of Conduct.

***ENTERPRISE-TURKEY*** reserves the right to immediately discontinue business relationships with suppliers who violate any policy or standards contained in this Code of Conduct.

***Ethical Behavior***

All suppliers are expected to maintain the highest standards of honesty and integrity in all business practices in full cooperation with ***The ENTERPRISE-TURKEY Code of Conduct*** and ***The ENTERPRISE-TURKEY to Business Conduct.***

***Compliance with Laws***

All suppliers must fully comply with all applicable national, state and/or local laws, regulations, and ordinances. In addition, suppliers must be fully compliant with their obligations with respect to any applicable agreement, understanding or other binding commitment.

***Labor Standards and Human Rights***

***ENTERPRISE-TURKEY*** forbids the use of child and compulsory labor, human trafficking and slavery, unsafe and hazardous working conditions and environments, and any behavior that does not maintain human dignity and respect.

***Conflict Minerals***

Supplier shall have a policy to reasonably assure that the tin, tantalum, tungsten and gold in the materials they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Supplier shall exercise due diligence on the source and chain of custody of these minerals and make its due diligence measures available to ***ENTERPRISE-TURKEY*** upon request. Supplier is responsible for putting a process in place to communicate these requirements to its suppliers and to monitor supplier compliance with these requirements.

***Health & Safety***

Suppliers must provide safe and healthy working environments. Suppliers are required to implement policies that prohibit the use of illegal weapons, harassment in the workplace and the illegal use or possession of alcohol, drugs and other controlled substances in the workplace.

***Equal Employment***

Suppliers must implement hiring practices that prohibit discrimination on the basis of age, culture and language, disability, ethnicity, gender identity, marital or family status, national origin, race or color, religious beliefs, sex, sexual orientation, or any other characteristic protected by law. These principles extend to all employment decisions, including recruiting, hiring, training, promotions, compensation, benefits, transfers and workforce reductions.

***Conflicts of Interest***

Suppliers must avoid all transactions or relationships that are or appear to be conflicts of interest.

***Gifts and Entertainment***

Suppliers are permitted to make reasonable and customary gifts to ***ENTERPRISE-TURKEY*** employees in the ordinary course of business provided that no improper remuneration will be permitted under any circumstance. Furthermore, suppliers should avoid excessive or frequent gift giving to ***ENTERPRISE-TURKEY*** employees; specifically, suppliers should ensure that any gifts to ***ENTERPRISE-TURKEY*** employees will not be perceived as a bribe, payoff or any other attempt to gain an advantage in any sourcing or other purchasing decision. ***ENTERPRISE-TURKEY*** employees cannot accept or give gifts in excess of USD $50.

***Bribes***

Any bribe or improper payment, whether or not it directly or indirectly benefits ***ENTERPRISE-TURKEY***, is prohibited.

Bribes include: cash, kickbacks or kickback schemes, unexplained rebates, payments for advertising or other disguised allowances or expenses. In addition, all suppliers are required to fully comply with all applicable anti-corruption laws.

***Freedom of Association and Collective Bargaining***

Suppliers must respect the rights of workers to lawfully form or join trade unions of their choosing and to bargain collectively.

***Sustainability and Social Responsibility***

***ENTERPRISE-TURKEY*** expects its suppliers to execute business practices that preserve and protect the environment, contribute to the social well-being of the communities in which they do business and have operations, and demonstrate accountability and transparency in sustainability performance.

***Publicity***

***ENTERPRISE-TURKEY*** prohibits the public disclosure of its name, logo, likeness, supplier relationships, products, parts, designs or any other non-public information in any press release, prospectus, offering memorandum, customer list, web site, including, without limitation, product displays at any trade show or supplier facility, without specific prior written authorization.

***Supplier Diversity***

***ENTERPRISE-TURKEY*** is committed to the inclusion of diverse businesses within the sourcing process and the supply chain. ***ENTERPRISE-TURKEY*** expects all suppliers to support this commitment by deploying strategies and programs to increase sourcing opportunities for diverse businesses, where applicable.

***Confidentiality***

All ***ENTERPRISE-TURKEY*** suppliers are expected to respect ***ENTERPRISE-TURKEY'S*** proprietary and confidential information and must maintain policies that enforce strict compliance with the confidentiality of such information.

***Contact Us***

For additional information regarding these expectations and requirements, please email us at [www.enterprise-turkey.com](http://www.enterprise-turkey.com/)

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