

EGE KIMYA

CODE OF CONDUCT



June 2020
Version 2



Table of Content

Introduction	3
About Us	4
Applying the Code of Conduct	6
Raising concerns	7
Working culture	8
Occupational health and safety	10
Our people	11
Human rights	12
Communities	14
Environment	15
Communication	16
Compliance	17
Conflict of interest	17
Bribery	18
Political contributions and activities	19
Competition	19
Sanctions	19
Money laundering	19
Gifts and invitations	20
Inside information	20
Quality and product safety	21
Social responsibility	22
Protecting and maintaining assets	24
Use of information systems	24
Personal information and privacy	24
Intellectual property	24
Media relations	25
Implementation of the Code of Conduct	26
Violations of the Code of Conduct	27
Contacts	27

Introduction

Ege Kimya aims to be a globally known organization that is also trustworthy and indispensable to its partners all over the world.

1

Ege Kimya aims to be a globally known organization that is also trustworthy and indispensable to its partners all over the world. We believe that sustainable business achievement is firmly connected to being compliant with laws, regulations and ethical norms, and, to be successful, it is essential that each and every member of Ege Kimya understands and acts on our values. The manner in which we do business in our sectors is a key component of our reputation.

Ege Kimya has consistently focused on this principle, and this Code of Conduct underscores this dedication. It summarizes significant laws and corporate approaches that inform the conduct of all Ege Kimya workers in their dealings with colleagues, civil servants, various stakeholders, and society in general. At the same time, this Code of Conduct should be used as a tool whenever there is doubt that the appropriate legal, administrative and ethical principles are being adhered to. It guides us to make the right decisions; however, not every potential circumstance can be foreseen in this one document. Particular laws and guidelines may apply in particular fields of action or areas.

Metin Mansur
Chairman of the Board



Therefore, we kindly request that you contact us via one of our “raising concerns” channels with any compliance-related question you might have.

Ensuring consistency and achieving fairness is a fundamental part of our daily business activity. We aim to develop and strengthen an authentic culture in which administrators act as role models advancing business ethics and legal conformance, and in which it is everybody’s duty to behave agreeably.

Ege Kimya does not tolerate any violation of this Code of Conduct. We kindly request you to adhere to the standards laid out in this report. We likewise urge you to report conduct that is not consistent with our organisation’s standards. We encourage promoting this Code of Conduct as an opportunity to manage our business in a sustainable manner.

About Us

2

Our production capacity has increased through co-production agreements and partnerships established with international firms, in an effort to become a preferred partner to other multi-national companies wishing to take advantage of our industrial agility.

Ege Kimya is the intermediate chemicals supplier to more than 15 sectors such as the detergent, ceramic, construction chemicals, rubber, vehicle tires, agriculture, paint, textile, paper and battery chemicals sectors with more than half a century of experience and a wide product-range. It has become a preferred company in the global supply chain with its customer-oriented management philosophy. The production capacities have increased through partnerships established with international firms, co-production agreements, in an effort to become a partner of preference to other multi-national companies wishing to take advantage of our industrial agility.

Ege Kimya provides solutions to the increasing expectations of its customers and business partners. With its chemical manufacturing facility established over 120 000 sqm located in Adapazari, and with all its established corporate and financial services, Ege Kimya is able to service the requirements of its clients.



EGE

EVONIK
INDUSTRIES

Applying The Code of Conduct

3 The Code is an integral part of our business agreements and their enhancements, and all present and future Ege Kimya approaches, rules and so on, will be interpreted and applied according to the Code.

Everyone working for Ege Kimya, regardless of their function, position or location, is subject to this Code of Conduct (hereinafter “Code”) and other Company policies. The Code is an integral part of our business agreements and their enhancements, and all present and future Ege Kimya approaches, rules and so on, will be interpreted and applied according to the Code.

This Code applies to all permanent and temporary workers, executives and officers, and to our contractors where they are employed under a relevant legally binding contract. All permanent and temporary employees, contractors, executives and officers must make themselves acquainted with the Code and its indicators and strategies, and the appropriate laws pertinent to their work. Failure to comply with the requirements of the Code, with relevant Ege Kimya policies or with the law will result in disciplinary activity, including termination of employment.

Raising Concerns

Concerns can be raised with the relevant supervisor in the related department, or with the local compliance officer.

4

Any circumstances in which the Code, its inherent policies or the law appear to have been breached by a director or supervisor should be raised at once. Concerns can be raised with the relevant supervisor in the related department, or with the local compliance officer.

If a concern remains unresolved through local channels, it can be referred to one of the corporate channels for raising concerns, such as by email to etik@egekimya.com or via the 'Contact' form on the corporate website at <https://www.egekimya.com/en/contact/>.

The website allows people to raise concerns anonymously. If there is no internet access, concerns can be reported by telephone using the numbers given in the 'Contact' section of the corporate website.

All concerns raised by means of these channels will be reviewed and evaluated immediately. The anonymity of those involved will be preserved, unless it is necessary to reveal identities so as to address the concern, or is a legal requirement. All concerns must be raised in a manner that complies with common decency. Under any circumstances, abuse of these channels will not be accepted and tolerated.



Working Culture

Ege Kimya approaches its suppliers of goods and services as business partners; it does not compromise on righteousness and honesty, and abides by contracts executed.

5

Ege Kimya approaches its suppliers of goods and services as business partners; it does not compromise on righteousness and honesty, and abides by contracts executed. In commercial relations, it fulfils its obligations based on contracts made, and delivers fully and on time.

The 'Righteousness' principle is an integral part of Ege Kimya's concept of business transactions. Group companies' relations with each other, with their respective employees, customers, vendors, partners, shareholders and society in general are maintained on the basis of transparency and honesty.

Ege Kimya fulfils its obligations which are required by its commitment to laws and codes of conduct under all conditions. In addition, the company commits itself to their full implementation. It ensures that matters which arouse suspicion, including violation of laws, regulations, company principles and codes of conduct, are investigated to the fullest extent.

Customer-oriented operations are a significant part of Ege Kimya's culture. Ege Kimya believes that its customers' satisfaction is the result of the company's determination in responding to customer needs, its devotion to its code of conduct and the high quality of the products and services it offers.

Occupational Health and Safety

6

We acknowledge that we are all responsible for our own safety and the safety and wellbeing of our colleagues, contractors and the communities in which we work.

The safety of our employees is Ege Kimya's number one priority. We believe that all occupational health issues and injuries are preventable when full precautions are taken.

We acknowledge that we are all responsible for our own safety and the safety, and wellbeing of our colleagues, contractors and the communities in which we work. In this regard, we undertake all required measures for occupational health and safety issues, with all necessary equipment and procedures.

We are committed to a strong safety culture that requires the collaboration and engagement of our employees, as well as a focus on hazard identification, risk analysis and management. It is of the highest importance to us that our people are trained, competent and fit to fulfil their duties.

We believe that none of our employees should commence any task that they consider unsafe or where the hazards cannot be controlled. In this regard, we empower all our employees to have the authority to stop work that is considered unsafe.

We strictly follow all applicable local and international law and policies such as Turkish Labor and OHS Law and ILO standards.

Supporting Documentation: Occupational Health and Safety Policy



Our People

Ege Kimya will not tolerate any psychological harassments, discrimination, ostracism or intimidation of its employees by outsiders or by fellow-employees.

7

Our people are key to our prosperity and we accept that they should be dealt with reasonably and with respect. Ege Kimya will not tolerate any psychological harassments, discrimination, ostracism or intimidation of its employees by outsiders or by fellow-employees. We do not tolerate any discrimination on the basis of race, nationality, religion, sex, age, sexual orientation (LGBT), disability, heritage, social origin, political or other opinion, or other bias. We are firmly committed to offer a workplace in which decent variety is endured and acknowledged. Ege Kimya workers are likewise expected to act in a similar manner.

We will not tolerate any of our employees to be harassed or bothered sexually, socially or physically by outsiders or by fellow employees.

We are strongly against the use of any type of forced or mandatory child labour. Our workers are employed and promoted based on their general capability for, and achievement in, their particular occupations. Our compensation structures depend on every individual's situation, experience and capacity; we reward achievement and self-improvement.

Laws and regulations governing the equality of men and women shall be observed. In this regard, we are committed to upholding the International Labour Organisation Declaration on Fundamental Principles and Rights at Work as well as relevant current Turkish laws.

Human Rights

We give utmost importance to the dignity, fundamental freedoms and human rights of our employees and the communities in which we live and work, as well as of others affected by our activities.

8

We always support and respect human rights in a manner consistent with the Universal Declaration of Human Rights. We give utmost importance to the dignity, fundamental freedoms and human rights of our employees and the communities in which we live and work, as well as of others affected by our activities.

As Ege Kimya, we do not tolerate any sort of discrimination, harassment or physical assault. We respect the rights of our workers, as well as the rights of association and collective bargaining. In our dealings with our colleagues, together with our supply chain partners and venture partners, we urge them to adopt our approach with regard to human rights, or to work to an equivalent standard.

We acknowledge that our operations might impact communities in our operational areas. We take pride in our efforts to reflect the communities in which we operate. Wherever possible, our intention is to uphold or restore the livelihoods and standards of living of communities that are affected by our activities.



Communities

Our commitment with local communities is integrated into all levels of our activities.

9

We strive to create long-lasting relationships with our neighbours by identifying and addressing their concerns, and by supporting activities and projects which are designed to improve their quality of life.

Our commitment with local communities is integrated into all levels of our activities. We engage with open establishments on time, in a precise and an unambiguous manner, and endeavour to maintain an open dialogue. We address and resolve the issues and worries of neighbours and local communities by working with them, incorporating the use of formal grievance and complaint procedures at our end.

We do not give incorrect, bogus or misdirecting information in our dealings and advertising exercises. We also do not provide false statements.

Environment

We regularly evaluate our operations to determine our recycling and reuse options and potential gains from the environmental benefits they bring.

10

As Ege Kimya, we take maximum care to protect the environment in both our own operations and in those of our vendors and business partners. We use natural resources and energy resources efficiently while minimizing our waste output, reducing emissions and protecting biodiversity.

We control all types of waste resulting from production activities in compliance with the relevant established standards and regulations (ISO, etc.). Where these standards are less stringent, we apply our own more stringent standards.

Our potential environmental impacts are specific to distinctive commodity groups or production sites. In this regard, we aim to identify and analyse our environmental impacts, and to reflect them in our planning and control structures and day-to-day activities. We also regularly evaluate our operations to determine our recycling and reuse options and potential gains from the environmental benefits they bring.

We demonstrate active stewardship of the land, freshwater and biodiversity systems with which we interact. We recognise the potential impact of our activities on water resources. We continuously monitor the quantity and quality of the water used in our processes, and practice responsible wastewater disposal in alignment with the current Turkish laws and regulations. Considering the potential of our operations to impact air quality, we also monitor emissions and dust from our operations. We acknowledge the increasing societal and regulatory pressure to reduce carbon dioxide emissions to address climate change and intend to support the development of low emission technologies.

As a company that believes in the importance of training, we conduct various training activities with the aim of improving our employees' environmental awareness.

Supporting Documentation: Environmental Policy



Communication

11

We are focused on communicating regularly, fearlessly and accurately with our representatives, contractors, clients, suppliers, local networks and financial specialists, as well as with affiliations, governments and various partners.

We strongly believe in the importance of, and energetically committed to, dialogue with partners. We are focused on communicating regularly, fearlessly and accurately with our representatives, contractors, clients, suppliers, local networks and financial specialists, as well as with affiliations, governments and various partners. We willingly divulge all information as required of a publicly listed organization.

We try to correspond with every one of our partners - factually, conveniently and usefully - over a wide range of issues. With relevant partners, we share data on issues that influence our operations and tasks. Our commitment to communication with every one of our partners bolsters our dynamic procedure and decision-making process.

We consistently take part in dialogue with governments on topics that influence our operations and tasks. Maintaining open and valuable associations with governments guarantees continuous awareness of the opportunities, limitations and threats to our operations. Interchanges with governments are limited to appropriate senior management or authorised personnel and all data shared is accurate and transparent.



Compliance

We are focused on working to solid ethical principles. We expect everyone working for Ege Kimya to assume individual liability for ensuring that their actions fit in with these standards.

We will not intentionally help any outsider to breach the law, or take part in any illegal, dishonest or immoral practice in any nation. We look to forestall such unacceptable behaviour through policies and initiatives backed up with internal protocols, methodologies and controls.

12

Conflict of Interest

A conflict of interest arises when that which is in a person's best interest is not in the best interest of another person or organization to which that individual owes loyalty. Everyone working for Ege Kimya must consciously avoid situations where they may gain personally by being disloyal to their employer - and in fact others. Fulfilling its obligations with proven expertise is the real advantage of Ege Kimya and this should be the norm and safeguarded.

Any concerns around a real or potential conflict of interest or an ambiguous circumstance must be quickly referred to a relevant administrator, director or compliance officer. Temporary workers, suppliers and partners are engaged via reasonable, formal procedures that incorporate where appropriate contractual terms that reflect our values.

Bribery

Bribe is defined as the gift or receipt of a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith. Employees of Ege Kimya should not request, acknowledge, offer, give or approve any pay-off either legitimately or by implication or through any outsider. Any worries about potential bribery must be raised with an administrator, chief or a suitable compliance officer, or where appropriate through the 'Raising Concerns' channels.

A public authority may offer to authorise or accelerate a procedure in exchange for a small payment. Such payments are frequently called "contributions" and ought not be made. All dealings with public authorities must be transparent and straightforward, and avoid any circumstance that prompts the public authority to conduct its work inappropriately.

Anybody working for Ege Kimya who does not conform to relevant anti-corruption laws will face disciplinary action that could include dismissal.

Political Contributions and Activities

We do not allow any of our assets and resources to be used for a commitment to any political campaign, ideological group, political nominee or partnered associations with the goal of obtaining a business advantage or other favourable position. We will not use gifts as a way of obtaining political favour.

Competition

We follow the standards set down by competition laws. We expect everyone working for Ege Kimya to know about competition laws, to avoid infringement and to ensure that our suppliers and trading partners are not taking part in aggressive and damaging actions that could harm our business or reputation.

We ensure that our workers exposed to such risks to have dedicated training and guidance on which type of activities may break competition law, and the practical steps that can be taken to avoid any misconduct.

Sanctions

Sanctions are laws, guidelines and obligatory measures legislated by administrators to specific states, systems, elements and people. Such laws, guidelines and measures may directly or indirectly restrict exchanges including products, administrations, financial transactions and capital, or personal development. They may likewise incorporate different disincentives, permission and dictated obligations. Every employee in Ege Kimya should respect and maintain any relevant sanctions.

Money Laundering

Money laundering is a procedure whereby the origin of assets created by illicit activities is disguised, and those assets are monetised such that they appear as if they are obtained from a genuine source.

We will not tolerate or help any outsider in money laundering or other unlawful practice. We empower and encourage everyone working for Ege Kimya to disclose to an administrator, supervisor or 'Raising Concern' channel any concerns over any person or persons likely to be engaged in present or forthcoming money laundering.

Gifts and Invitations

Ege Kimya does not give or accept gifts. Gifts that are out of proportion with the objective of a gift - such as those with a high financial value or that risk damaging the impartiality of the recipient - should especially be avoided.

Sensible business-related entertainment (for example, dining, social events and get-togethers) is acceptable when it is customary and helps Ege Kimya to interact with its clients and wider stakeholders. The decision to engage in such entertainment must be made on a case-by-case basis, considering all conditions including whether the host will be present, that the event is not repeated regularly, and that the host does not pay for travel and subsistence. The management responsible should in any case be informed in advance about the situation.

Nothing valued at more than 25\$ from a customer, vendor, or other third party can be accepted by an employee.

Insider / Sensitive Information

We have frameworks and procedures set up to ensure that internal data and sensitive information about Ege Kimya is secure and guarded.

Insider Information;

- is exact and material in that it is likely to influence a decision made on a transaction related to Ege Kimya's assets.
- is not available to the public (is confidential).
- relates legally or in any other form to Ege Kimya or another organization that Ege Kimya is working with.
- could significantly affect Ege Kimya's assets if made public.

Insider information should not be used when making decisions on when to deal in our shares. Representatives or temporary workers that have access to sensitive data related to Ege Kimya must not deal in our shares, nor share this data with any other person, including relatives.

Confidential data about other companies may likewise be treated as sensitive data. Any employee of Ege Kimya with access to such data about other organizations will have similar limitations.



VTR 1000 S
DE 2011

Quality and Product Safety

13

Our marketing, coordination and product safety units work closely with our clients and specialist organizations to guarantee the quality and security of supplies throughout our value chains.

We keep in regular contact with all partners that are involved with any part of our products. We endeavour to promote the reliable use and management of these products.

With our corporate identity, we achieve rapid and sound growth targets in full compliance with national and international regulations, by being involved in developing such regulations and ensuring full protection of all our intellectual and industrial property rights. These actions likewise guarantee that all products are accompanied by documentation that permits safe transfer, handling and use of our products by our clients. Our marketing, coordination and product safety units work closely with our clients and specialist organizations to guarantee the quality and security of supplies throughout our value chains. We ensure that client enquiries are managed in an appropriate and timely manner.

We operate according to national and international quality standards, as evidenced by the quality certificates we have attained.

Social Responsibility

14

We voluntarily contribute to a better society and environment, and support our employees participating in social and public activities in order to develop their awareness of social responsibility.

Being conscious of its social responsibilities, Ege Kimya strives to be an active player in the prosperity, happiness and well-being of society.

We voluntarily contribute to a better society and environment, and support our employees participating in social and public activities in order to develop their awareness of social responsibility.

We aim to positively contribute to the lives of children, the elderly, women and people with disabilities. We value and care about them, and give support to projects focusing on them.



Protecting and Maintaining Assets

We are all liable for resources owned and provided by Ege Kimya. These resources include business opportunities, reserves, property, restricted data, and hardware (for example cell phones, PCs and access rights to our IT framework).

15

We avoid the potential risks of harm, abuse or theft of our assets and make sure that anybody working for Ege Kimya does not take advantage of them for personal gain.

Use of Information Systems

All Ege Kimya data frameworks and the information stored in them, regardless of its location, are the property of Ege Kimya. Ege Kimya's information and data frameworks are essential assets and should always be used responsibly.

We may monitor the use of our IT assets; this includes access to e-mail, web use, record stockpiling and PCs. Such oversight may record any abuse including the creation, handling and content of data that is to the detriment of Ege Kimya and its operations, or in breach of local laws and guidelines.

Everybody working for Ege Kimya must ensure that they understand not only the principles in regard to abuse of the company's IT assets but also the importance of acceptable use.

Personal Information and Privacy

We only gather and hold personal data that is vital to meet the needs of the business, as allowed by local laws in locations where we operate.

Intellectual Property

Intellectual property (IP) is data possessed by Ege Kimya. IP incorporates patent rights, trademarks, copyright, draft rights, database extraction rights, intellectual rights or other secret data and rights under IP-related agreements.

We protect our IP resources just as we do our physical resources. IP infringement implies unapproved access or use by employees, clients, suppliers and competitors, including anybody using our name or brand without our endorsement.

Supporting Documentation: Information Security Policy

Media Relations

Ege Kimya pursues for a transparent communication and data policy against the media.

Ege Kimya pursues for a transparent communication and data policy against the media.

Our management is the approved conduit to and from the media. In the event of receiving a direct/personal request from the media, an employee(s) should notify Ege Kimya's management before replying. Any announcements to the media by representatives are only allowed with the prior approval of CEO.



17

Implementation of the Code of Conduct

The principles of this Code are provided in writing to all employees, and signed for, as part of Ege Holding Personnel Regulations.

The principles of this Code are provided in writing to all employees, and signed for, as part of Ege Holding Personnel Regulations. The Code is available to all external parties, and is also available online.

The Code does not address every single possible circumstance and condition. This does not imply that its intended or unintended misuse is permitted. In fact, the Code presents normal baseline behaviour and supports sound judgment. Workers are required to behave honestly, eagerly, legitimately, and mindfully. Accordingly, when deciding on the most appropriate action, the following checks might be helpful:

- Would Ege Kimya be affected negatively if this were known to the public?
- Might I be able to disclose this to my family?
- How would this appear to my colleagues if they heard about it?

Compliance to these rules in its essence and spirit is monitored and ensured.

Violations of the Code of Conduct

18

Even seemingly minor breaches of the Code by employees can negatively influence Ege Kimya's reputation and cause significant damage, including financial damage.

Even seemingly minor breaches of the Code by workers can negatively influence Ege Kimya's reputation and cause significant damage, including financial damage. All our stakeholders are obliged to comply carefully with the provisions of the Code, and company officers and executives must behave in an exemplary manner in this regard. Compliance with the Code will be considered in the representative's yearly performance assessment.

Decisions and actions in breach of the Code will not be tolerated and in the event of possible violations to the Code, the Disciplinary Committee (CEO, Deputy General Manager and Department Manager) will work together to apprehend the relevant party(ies) and put things right.



In case of an unresolved concern/s through local channels, please refer to one of the corporate channels. To raise concern/s, by email etik@egekimya.com or via the 'Contact' form on the corporate website at <https://www.egekimya.com/en/contact/>. Any report made will be kept confidential to the fullest extent possible consistent with law and good business practices.



**Ayazma Cd. No: 37 Papirus
Plaza Kat:10 No:5, 10-15
Kagithane / Istanbul 34406
etik@egekimya.com
+90 212 294 65 67**