

A blue-toned background featuring a complex molecular structure with spheres and connecting lines, overlaid on a pattern of hexagonal chemical rings.

Akdeniz Chemson Code of Ethical Conduct





We Are The Formula!

We have the power to follow the rules.

Dear Akdeniz Chemson employees and our business partners,

The Akdeniz Chemson Code of Ethical Conduct is a formula that shows the chemical harmony between the processes in which we are involved, the world of business, and our conduct. Our regard for one another, moral values, compliance with laws and legal rules, environmental awareness, firm stance against bribery and corruption, and efforts to protect the company's data and intellectual property rights which are the main and essential components of this formula. When all these components come together, Akdeniz Chemson emerges as a highly reputable and prestigious company.

The absence of one of the abovementioned main values from the formula may lead to unexpected chemical reactions and cause irreversible consequences by damaging our reputation in the eyes of our business partners, employees, families and all other stakeholders.

Building a reputation may take many years, just as creating a formula from scratch, while a single wrong reaction can cause that reputation to be lost in mere seconds.

As there is a strong correlation between success and reputation, all Akdeniz Chemson employees and our business partners are responsible for protecting this reputation and achieving success (by constantly applying the right formula). Formulated for the very reason of this purpose, the Akdeniz Chemson Code of Ethical Conduct is a substantial guide to proper business management.

I would like to remind you that it is important to keep the abovementioned formula in mind, to refer to the said guide in case of doubt, and to contact the relevant departments in accordance with the rules, when necessary, in order to adopt ethical ways of working at all times.

We are working in different regions of the world for Akdeniz Chemson, an industry-leading organization that has always maintained its reputation with its well-intended, honest, and ethical business management culture. I am certain that the confidence in our Company's ethical stance will continue and increase with your help. I have no doubt that you are going to act with formula suitable for our chemistry in this endeavor and I would like to thank you for joining us on this journey.

Sincerely,

Ersin İzmirluoğlu
CEO



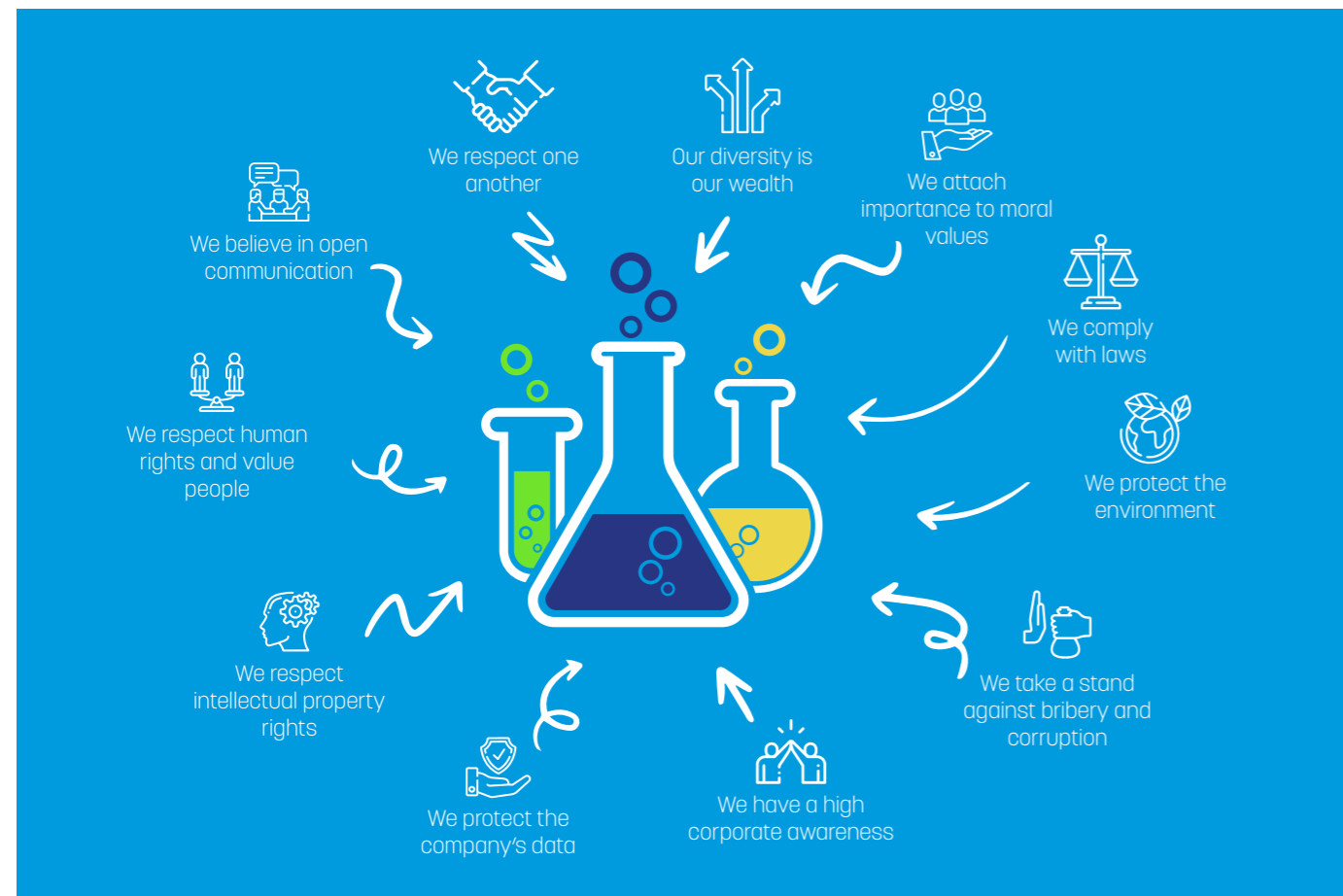
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1. PURPOSE AND SCOPE

The Akdeniz Chemson Code of Ethical Conduct sets forth the company's principles of conduct. It describes Akdeniz Chemson's shared values, as well as changes in legal, social, and economic conditions, and serves as a guide for Akdeniz Chemson's employees and business partners.

We follow our ethical principles, create a positive image, and build a good reputation for our brand in all areas and countries where we operate. We fulfill all our responsibilities for protecting and improving the prestigious image of our company.

Within this framework, we ensure that our personal state and behavior comply with laws and general moral rules. In this context, the main principles that we expect our employees and business partners to follow are as follows:



We expect Akdeniz Chemson's employees and business partners to know, understand, and comply with Akdeniz Chemson's Ethical Principles, as well as the legal regulations of the countries where Akdeniz Chemson operates or has business relations.

2. WE COMPLY WITH LAWS AND SOCIAL NORMS

As Akdeniz Chemson operates in several countries around the world, it is subject to the laws and regulations of different legal systems. We expect Akdeniz Chemson employees to comply with applicable laws, rules, and regulations and respect local customs and social norms in the countries where we operate.

In case of any ambiguity in the legislation, we follow our Ethical Principles or consult authorities, when necessary.

When carrying out activities on behalf of Akdeniz Chemson, we ask ourselves the following questions:

- Does my behavior or decision comply with applicable laws, standards, and norms, as well as Akdeniz Chemson's values and standards?
- Are the risks associated with the activity considered?
- Will my behavior have any negative impact on the company's reputation? Is my decision in line with a public and social conscience?

3. WE RESPECT HUMAN RIGHTS

Our Responsibilities Towards the Society

As Akdeniz Chemson, we respect the rights of our employees, shareholders, business partners, customers, and anyone who is affected by our products or services in connection with our activities, based on the Universal Declaration of Human Rights of the United Nations (UN) and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

In this context, as Akdeniz Chemson,

- We never tolerate child labor, slavery, human trafficking, or forced labor;
- We treat all employees equally and strive to be fair, and we expect all our stakeholders to adopt the same approach;
- We follow all local laws, especially those regarding the protection of minorities;
- We respect cultural diversity;
- We reject any discrimination based on ethnic or social background, language, race, skin color, gender, sexual orientation, political opinion, belief, religion, sect, age, physical disability, or any such ground; and
- We always treat stakeholders with integrity and in the way we would like to be treated.

Establishing and Maintaining a Fair and Safe Work Environment

We ensure equality of opportunity in human resources policies and practices aiming to create and maintain a fair and safe work environment (recruitment, promotion-transfer-rotation, effective and objective performance evaluation system, remuneration, rewarding, social benefits, training, etc.). We carry out recruitment, remuneration, promotion, and dismissal processes according to the competencies, knowledge, skills, and performance of candidates and employees.

As Akdeniz Chemson,

- We do not allow factors such as religion, language, race, ethnicity, gender, sexual orientation, physical appearance, or political opinion to play a role or create a privilege in these processes;
- We provide our employees with the necessary flexibility, freedom, and experience to be successful;
- We create open communication and continuous and diverse learning opportunities;
- We ensure the full and proper exercise of the personal rights of our employees; and
- We make the necessary effort for the personal development of our employees.

Respect and Privacy in the Workplace

As Akdeniz Chemson employees, we share our ideas and opinions in an open, kind, respectful, and honest manner with a sense of responsibility. We are responsible for respecting the personal spaces and private and family lives of all our employees.

Harassment and Mobbing in Workplace

As Akdeniz Chemson, we do not tolerate any form of harassment or mobbing in workplace.

Akdeniz Chemson employees are responsible for;

- Promoting and contributing to a work environment free from harassment and mobbing;
- Reporting and intervening in any harassment situation that we witness;
- Not tolerate any violation of the integrity of our employees or stakeholders through physical, sexual, and/or emotional abuse by our employees or others in the workplace or in any work-related context; and
- Not tolerating any systematic and planned action that is considered an act of mobbing and aims to alienate a person from work, hamper their performance, or cause them to leave their job.

Management, Accountability, and Oversight

We believe that compliance with the code of ethical conduct starts at the management level. As Akdeniz Chemson, we expect our managers;

- To emphasize the importance of ethical conduct and compliance with regulations in daily tasks,
- To set clear, ambitious, and realistic goals and set an example for others,
- To be open to and available for employee's concerns about compliance, other questions, and professional or personal problems, and
- To help all members of akdeniz chemson to work together to ensure compliance with laws and the company's policies.

4. WE ARE COMMITTED TO ENSURING SAFETY AND PROTECTING THE ENVIRONMENT

Environment and Sustainability

As Akdeniz Chemson, we are aware of our responsibility for protecting the environment and committed to taking the necessary actions to fulfill this responsibility. We develop, take part in, and contribute to eco-friendly and sustainable projects to leave a more livable world to future generations. Furthermore, we believe in leadership in sustainability and strategically define sustainability as one of our core values and goals as a company.

In order to protect the environment and promote sustainable living,

- We comply with all environmental laws, regulations, policies, and guidelines;
- We take the necessary measures to minimize environmental risks; prevent soil, air, and water pollution; and reduce noise;

- We take measures for the conservation of natural resources at all stages of production in order to prevent climate change and global warming;
- We attach importance to recycling and design our business models accordingly in order to ensure efficiency and minimize waste generation;
- We ensure environmentally-friendly and clean production and create a healthy living environment at all our sites;
- We keep our awareness of potential environmental incidents high and notify the relevant authorities immediately when necessary; and
- We follow the developments on sustainable development goals and update our policies accordingly.

Occupational Health and Safety

A healthy and safe work environment is one of the priorities of Akdeniz Chemson. We take all the necessary measures for this purpose and conduct training programs on occupational health and safety to raise awareness of this matter. We operate in sites with a safe design, work with competent people, and always give top priority to safety in our processes.

As Akdeniz Chemson, we have a safety management system that allows us to carry out our activities healthily and safely without putting our employees, contractors, subcontractors, suppliers, visitors, or society at risk.

To ensure workplace health and safety, we expect our employees

- Not to start work unless the necessary safety and health measures are taken;
- To participate in training programs on occupational health and safety (ohs);
- To immediately report any health and/or safety incident to the relevant environment, safety, and health manager;
- To prepare for emergencies under our procedures, know what to do in case of an emergency, and be aware of the applicable rules in their area of responsibility;
- To observe all legal requirements regarding workplace health and safety;
- To comply with all legal regulations and company policies regarding occupational health and safety in the relevant country; and
- To report any unsafe working conditions through our communication channels.

5. WE ARE DETERMINED TO COMPLY WITH THE REQUIREMENTS OF OUR CORPORATE STRUCTURE

Conflict of Interest

As Akdeniz Chemson, we always meet the highest ethical standards in line with the interests of the Company. We make a clear distinction between personal interests and the interests of Akdeniz Chemson. We avoid any situation that may prevent us from being impartial when making the decisions required by our role or responsibilities, provide benefits to us or our relatives or close friends or create such an impression.

Therefore,

- We avoid any conflict between the personal interests of any employee and the interests of akdeniz chemson;

- If a candidate is a spouse or a relative (including third-degree relatives) of one of the managers with the authority to make the hiring decision or recruitment officers in the human resources department, we take measures to eliminate the conflict of interest;
- We ensure that our employees, their spouses or relatives (including third-degree relatives), or those in a close relationship with them do not have any financial interest in any organization that is a competitor, supplier, or customer of akdeniz chemson or its subsidiaries or that seeks to do business with akdeniz chemson or its subsidiaries;
- We ensure that employees who are spouses or relatives (including third-degree relatives) are not in the same reporting line or decision-making mechanism in a unit within akdeniz chemson;
- We expect our employees to avoid engaging in activities that require them to be considered a “merchant” or “tradesperson” directly or indirectly, or working for any other person and/or organization for a wage or any such benefit in any context during or outside working hours; and
- We contact the ethics committee in case of any potential conflict of interest and/or any such concern.

Political Activity

Akdeniz Chemson employees must meet the following requirements when engaging in political activities individually and voluntarily.

- We avoid any conflict of interest regarding the fulfillment of the existing duties and responsibilities of our employees due to the political activities in which they are involved.
- We do not use the name Akdeniz Chemson or the titles within the company.
- We do not engage in political propaganda in the workplace during working hours. We do not occupy other employees with such activities.
- We should not become members of or participate in the activities of any illegal political party or organization.
- We do not use the resources of the company (vehicles, computers, email accounts, etc.) for political activities or for personal donations to be made for this purpose.

Doing Business with Former Employees at Akdeniz Chemson

For employees who have left Akdeniz Chemson to do business with the company as sellers, contractors, consultants, brokers, agents, distributors, dealers, etc., the following requirements must be met.

- The former employee should not have any disciplinary record during their period of employment at Akdeniz Chemson or should not have left Akdeniz Chemson due to their unethical business conduct.
- The former employee should not have any conflict of interest due to their role at Akdeniz Chemson.
- To enter into a business relationship with a company of which a former employee of Akdeniz Chemson is a partner or manager, the selection process for the purchase of goods/services must be carried out in an objective and fair manner, and the approval of the CEO of the Company must be obtained.

If a former employee of Akdeniz Chemson works for a company that is in a business relationship with Akdeniz Chemson or is one of its competitors, the former employee is required to fulfill their obligation of confidentiality regarding the proprietary information and documents they accessed during

their term of employment at Akdeniz Chemson. Furthermore, if the former employee has accessed sensitive information and business decision-making mechanisms at Akdeniz Chemson due to their role and wishes to work in the same or a similar field of activity as their role at Akdeniz Chemson, it is essential not to enter into such a business relationship for three years (is this legally enforceable?) from the termination of their employment. The Ethics Committee is authorized to evaluate and approve exceptional cases.

6. WE OBSERVE BUSINESS ETHICS AND LAWS

Fair Competition and Compliance with Competition Laws

At Akdeniz Chemson, we continue our reputation by following our company policies and complying with legal regulations in all the countries where we operate. We avoid violating the competition law in all our practices. We only compete in accordance with legal and ethical rules and avoid unfair competition. We comply with all applicable competition laws in any country where we operate.

As Akdeniz Chemson, we ensure compliance with the competition law as follows:

- We comply with the regulations on competition.
- We do not enter into agreements or take actions that aim to prevent, disrupt, or restrict competition directly or indirectly or that lead to or may lead to such a consequence.
- We avoid any abuse of dominance by our subsidiaries that dominate the markets in which they operate.
- We avoid the abovementioned situations in any meeting or communication, including association, council, chamber, and professional association meetings where Akdeniz Chemson is represented, as well as other private or professional meetings and gatherings where competitors come together, such as conferences or trade shows,
- We never exchange information with our competitors regarding factors related to competitiveness.
- We contact the Ethics Committee in the case that we believe or suspect that there is an anti-competitive practice.

Our Responsibilities Towards Our Customers, Suppliers, and Business Partners

We follow the principles below in our relationships with customers, suppliers, and patent holders or licensors.

- We adopt a proactive approach focused on customer satisfaction to meet the needs and demands of our customers most quickly and appropriately.
- We offer services on time by fulfilling the conditions promised and adopting a respectful, dignified, fair, equitable, and kind attitude towards customers. We carefully protect any confidential information concerning our customers.
- We select the suppliers that meet the highest standards in terms of the ability to meet Akdeniz Chemson’s needs, service quality, integrity, compliance, price, quality, and time, and we strive to establish long-term business relationships with our suppliers.
- We evaluate our suppliers based on objective criteria, such as performance, price, service quality, and references.

- We protect any highly confidential information concerning suppliers and respect our suppliers' copyrights and intellectual property rights.
- We do not do business with any business partners that may damage Akdeniz Chemson's reputation and are known to fail to comply with national and international legislation and regulations.

Compliance with Other Laws

As Akdeniz Chemson,

- In line with our ethical principles and related policies, we do not accept any personal payment, bribe, tip, or other similar payment. Also, we don't offer any personal payment, bribe, make a similar offer to customers, suppliers, or other third parties that Akdeniz Chemson does business with. We expect all our employees and business partners to fulfill their obligation to comply with local and international anti-bribery and anti-corruption regulations.

Akdeniz Chemson complies with all anti-money laundering laws. We do not tolerate or become involved in money laundering activities.

In this context, as Akdeniz Chemson,

- we ensure that all our reports, financial statements, or records should keep in accordance with the national and international accounting principles established according to the applicable legislation;
- we organize and archive all documents on business transactions and meet the deadlines set by the law for recording; and
- we immediately report any suspicious business transaction to the Ethics Committee.

Accepting and Giving Gifts

When exchanging gifts, Akdeniz Chemson employees must follow the rules below:

- They should not request or accept any gift, benefit, support, entertainment, special discount, cash, or cash equivalent that may affect their impartiality, decisions, or behavior, as a commission or discount for their own benefits.
- They should not accept any gift from the persons or organizations with which we are in a business relationship, except for gifts that undoubtedly have symbolic meanings and are worth less than 100 USD (flowers, chocolate, and promotional materials bearing the company's logo sent by individuals, institutions, or organizations shall not be subject to this limit).
- Our employees should not accept any cash or cash equivalent as a gift, regardless of the amount, or receive loans from suppliers, consultants, competitors, or customers.
- They should not accept any gift, even those with a value less than the limit, during the tender, investment, or bidding processes.
- They should not give any gift to the persons or organizations with which they are in a business relationship, except for the promotional gifts prepared by the Company. The gifts and promotional materials to be given to customers, dealers, and other third parties with which the Company is in a business relationship shall be approved by the Senior Corporate Relations Manager.
- When participating in activities sponsored or funded by third parties (entertainment, complimentary training, seminars, accommodation, trips, meals, etc.), they should avoid situations that may cause a conflict of interest and affect decision-making processes.

- They must obtain written approval from their line manager to accept the invitations of third parties or our existing or potential customers to complimentary conferences, promotional meetings, training programs, public events, sports events, and other similar events.

Our employees may hold and attend reasonable hospitality and entertainment events and meals for business purposes. At seminars and similar events where the Company represented, awards, plaques, and gifts with symbolic value, except for money, can be accepted as souvenirs.

In some exceptional cases, where the local cultural values require an exchange of gifts exceeding the limits, those gifts can accept on behalf of the Akdeniz Chemson. Also, this activity must require the evaluation of the Ethics Committee.

In this context, it is essential not to use those gifts personally. If the rejection of any gift is considered to damage business relations or violate the rules of courtesy, please consult the Ethics Committee.

Proper Use of Company Assets

It is essential that all the assets and equipment of Akdeniz Chemson are used carefully and only for business purposes. In order for all Akdeniz Chemson employees to use the company's assets properly, we ensure that

- The workplace, equipment, and all operational or employee facilities are kept in good working order at all times and used sparingly;
- Any damage is directly reported to the department manager, and the company's property is not used for personal purposes or taken out of the company building without the express approval of the department manager, who is responsible for the property;
- Approval limits and any applicable travel and expenditure policies, instructions, and procedures for business travel expenses and other expenses are complied with; and
- Attention is paid to any attempt by a third party to gain access to the company's assets through theft, fraud, and cyberattacks, and any such attempt or incident is reported to supervisors.

7. WE STORE INFORMATION METICULOUSLY

Protection of Internal (Non-Public) Information

Any information and document, including trade secrets, non-public financial information or other non-public information, and classified information concerning employees' rights or agreements entered into with third parties, that are provided by the company due to one's role or can be accessed in the workplace are subject to the policies on privacy and the protection of proprietary information.

All members and employees of Akdeniz Chemson are jointly responsible for ensuring the effective use, proper disclosure, privacy, integrity, and accessibility of information.

As Akdeniz Chemson, we take the following measures to protect non-public information:

- We are aware that it is prohibited to process and disclose personal, commercial, financial, technical, legal, or other confidential information for the benefit of Akdeniz Chemson or third parties, and we take all the necessary measures to protect the confidential information that we collect due to our roles and responsibilities.
- We protect the information we collected during our term of employment, and we do not disclose it to third parties even we leave Akdeniz Chemson,

- We process the information that we collect only to fulfill the duties in our job description, and we act proprietary with trade secrets and other confidential information in accordance with the relevant legislation and our contractual obligations.
- We strictly comply with the company's policies that include the principles to be followed by Akdeniz Chemson employees when handling the information.

Privacy and Personal Data Protection

Akdeniz Chemson respects the privacy of the data concerning all its employees, business partners, and customers. We must handle personal data responsibly and in accordance with all applicable privacy laws. In this context;

- We always protect the personal data concerning our employees, visitors, and all our stakeholders. We do not interfere with the information concerning them or their private lives. We record the personal data concerning our employees only within the framework of legal requirements and mandatory workflow, and we protect it through technical and administrative measures.
- We process personal and confidential data in accordance with legal regulations and the applicable local and international legislation, as well as the company's policy and principles on the processing of personal data.
- We observe our obligations arising from the relevant contracts.
- We do not use confidential information concerning Akdeniz Chemson for our interests.
- We do not disclose the passwords of computers, phones, tablet computers, and any other device and software that collect data, to anyone within or outside the company. We are responsible for the data security of the desktops or laptops, mobile phones, and tablet computers entrusted to us. We process the personal data that we collect due to our duty in accordance with the Law on Personal Data Protection (GDPR).

8. WE USE SOCIAL MEDIA RESPONSIBLY

As Akdeniz Chemson employees, we are careful about what we post on social media, and avoid posting any content that will damage the Company's public reputation.

Furthermore, we are aware of the significant risks that social media can pose to Akdeniz Chemson's reputation, as well as the benefits that can be derived by using it properly. Therefore, we follow the rules below when posting content on social media.

- We adopt an honest approach in social media communications and do not make misleading statements about personal information.
- As Akdeniz Chemson employees, we are aware of the outcome of any communication established through social media tools.
- We know that Akdeniz Chemson's privacy policy applies to any communication established on social media, as well.
- As the right to make statements regarding Akdeniz Chemson is exercised by Akdeniz Chemson's officials and boards, we know that we should not make any statements on behalf of OYAK and/or Akdeniz Chemson or any comments that will lead to liability, on the Internet.
- As Akdeniz Chemson employees, we do not make statements or comments that are offensive, humiliating, unwelcome, or threatening, or that otherwise violate the rights of others.

- No employee is allowed to make verbal or written statements on behalf of Akdeniz Chemson unless they are authorized to do so. Employees can make press statements, publish articles in the press, and attend conferences as a speaker by observing the internal regulations of the company and obtaining approval from the CEO.

9. WE RESPECT INTELLECTUAL PROPERTY RIGHTS

As we are an innovation-driven company, intellectual property rights are our key assets that secure and distinguish our business activities. We ensure the best and highest level of protection for our intellectual properties in order to gain a competitive advantage. We protect our intellectual property rights against infringement and respect the intellectual property rights of third parties.

10. HOW TO RAISE A CONCERN?

Reports

Akdeniz Chemson attaches great importance to integrity, transparency, and accountability in all its activities. Employees can report any practice violating the code of ethical conduct to Akdeniz Chemson's Ethics Hotline through the relevant channels.

This independent ethics hotline has been designed to protect the confidentiality and, if desired, the anonymity of whistleblowers. We keep all the reports confidential and protect all the rights and interests of those who report suspected violations in good faith.

Akdeniz Chemson's Ethics Hotline is managed by independent service providers.

It operates 24/7 and is the main method of whistleblowing.

For your questions and reports, contact Akdeniz Chemson's Ethics Hotline through the following channels:

A national toll-free phone number: +90 212 979 7035 (Available in Turkish and English)

A web-based reporting system: www.remedetikhat.com.tr/login (**Username:** akdenizchemson **Password:** ac2020) (Available in Turkish, German, Portuguese, and English)

Email: akdenizchemson@etikhat.com (Reports can be submitted in any language.)

Implementation and Responsibilities

Akdeniz Chemson's Code of Ethical Conduct has been established to ensure consistency in employees' practices in their relationships within and outside the Company. The Code of Ethical Conduct does not cover all situations. Therefore, these procedures can be diversified to ensure compliance with local laws or agreements.

The Ethics Committee, which consists of the managers of the Human Resources Department, Legal Department, and Compliance and Audit Department, is responsible for implementing the Code of Ethical Conduct. The Company takes all reports of potential ethical violations seriously and is committed to fully investigating all allegations in confidentiality.

Reports of ethical violations are first reviewed by Akdeniz Chemson's Compliance and Audit Department and then submitted to the Ethics Committee with an opinion on whether or not it is necessary to conduct an ethical investigation. Akdeniz Chemson's Compliance and Audit Department is authorized to conduct investigations into reports of ethical violations.

If an investigation is conducted upon the approval of the Ethics Committee and disciplinary action is recommended as a result of the investigation, the issue is referred to Akdeniz Chemson's Ethics Committee, depending on the nature of the incident and the role of the person investigated.

The Committee may decide to take the necessary disciplinary action based on objective criteria.

Reports that do not focus on a specific issue, that is not based on concrete evidence, or that have previously been submitted and finalized shall not be processed unless they contain new evidence.

All new employees must complete a consent form stating that they have read the Akdeniz Chemson Code of Ethical Conduct and agreed to comply with it. Failure to read the Akdeniz Chemson Code of Ethical Conduct or sign the consent form cannot be considered a valid excuse for violating the Code of Ethical Conduct.

DECLARATION OF COMPLIANCE WITH THE AKDENIZ CHEMSON CODE OF ETHICAL CONDUCT

I declare and undertake that I will comply with the Akdeniz Chemson Code of Ethical Conduct.

Employee's Name and Surname:

Registration No.:

Role:

Date of Declaration:



Akdeniz Chemson



www.akdenizchemson.com

