

1- PURPOSE and SCOPE

Akdeniz Chemson is a company which operates with the mission of producing innovative industrial chemicals by carrying on its operations with a solution-oriented approach with all of its partners and shareholders and which is determined to maintain its relationships with its business partners, including its suppliers, in this regard.

The reputation of Akdeniz Chemson is formed also by the actions of the third parties with which we operate as a team as well as the values and actions of its own employees. For this reason, we have desire to select our suppliers who will be a part of Akdeniz Chemson, carrying on its operations Globally, from the persons and entities that share our values and adopt the ethical standards at the same level with us and to establish a permanent and sustainable relationship with our suppliers.

Accordingly, all suppliers, sellers, consultants, representatives and all other product and service providers ("Suppliers") which have a business relationship with Akdeniz Chemson are expected to operate in full compliance with all applicable laws, regulations and rules and to adopt "Akdeniz Chemson Code of Conducts for Suppliers".

Given the different legal structures and laws of the countries in which we operate, the Principles of the Code of Conducts for Suppliers may not respond to every specific query and problem. In the cases where a specific circumstance is not expressly regulated, solution has to be sought in line with the prudent and objective criteria suitable for the essence of the Code of Conducts and our values.

Our Suppliers hereby declare as follows:

2- LEGAL APPLICATIONS

2.a. Trade

Akdeniz Chemson is a global company and acts in compliance with the international export, import and trading laws in its commercial operations. The suppliers also have to comply with all global commercial audits and the international export and import laws and regulations. These laws also include the embargoes, commercial sanctions, customs laws, product/country of origin marking laws and anti-boycott laws.

2.b. Competition Law

While carrying out its operations, Akdeniz Chemson attaches great importance to compete with its competitors under the free and fair competition conditions and to observe the welfare of the consumers. Therefore, Akdeniz Chemson does not abuse its dominant position in the markets where it is in a dominant position, does not cause obstacles for the entry into the market to the potential actors in the market, on the contrary, it supports the reduction of the prices within the framework of the applicable competition rules and the provision of innovative products and services adding value to life to the consumers and acts in compliance with the applicable national and international competition legislation in order to maintain the competition. All of our suppliers also have to act in compliance with the applicable national and international competition legislation in order to maintain the competition.

2.c. Anti-Bribery and Anti-Corruption

Akdeniz Chemson acts prudently in compliance with the legislation and ethical values of every country in which it operates. It is absolutely forbidden for Akdeniz Chemson and its employees to be involved in any action related to bribery, fraud, misconduct or money laundering and zero tolerance is applied in this regard.

Accordingly, it is unacceptable for our suppliers to commit improper actions such as receiving and giving bribe for gaining advantage under any circumstances. The employees of Akdeniz Chemson or our suppliers may not offer, give or accept any gift or payment that might be perceived as bribe. If bribe is claimed or offered, the offer must be immediately rejected and reported to Akdeniz Chemson.

It is forbidden for the persons acting on behalf of Akdeniz Chemson or third persons, including our Suppliers, with whom we have a business relationship, to directly or indirectly give any valuable item, use their authorities, bestow a privilege upon or otherwise provide or offer personal interest to any public or private sector officer or institution for the purpose of gaining any commercial interest or affecting the official business or decisions. Paying any tip or making an additional payment, directly or indirectly, to the public officers or institutions in order to facilitate any public service or business must be considered within the scope of this prohibition.

2.d. Economic Sanctions

Certain countries in which we operate might have imposed restrictions on other countries, companies and persons. The breach of these restrictions might have uttermost significant outcomes such as administrative fines, revocation of our export licenses and judgment of prison sentences potentially. Therefore, our suppliers have to closely follow up the economic sanctions, export inspections, anti-boycott and embargo, anti-fraud and customs laws and comply with the applicable regulations all the time.

3- WORKING CONDITIONS

Akdeniz Chemson is dedicated to provide all of its employees with a fair, safe, productive and comprehensive working environment and to act in compliance with the universal rules for human rights. Akdeniz Chemson considers it as one of the most fundamental factors affecting the success of the Company to provide the employees with the mentioned working environment and asks for its business partners to share its commitment in order to establish a successful supply chain. For this reason, we expect our suppliers also to comply with the following rules.

3.a. Forced Labour

The Supplier must only use voluntary labour force and employ the personnel who want to work with their own free will. The Supplier must not require any of its employees to deposit a guarantee, give a surety or leave his identity on consignment before starting to work. The Supplier must not impose any threat, power, untrue declarations or forced labour by any other type of pressure on its employees. This requirement also covers employment in return for high-interest debt, bonded employment beyond personal will, contracted slave/prisoner employment or other forms of employment.

3.b. Child Labour

The child labour phenomenon is an issue that impedes the education of children, impairs their physical and psychological health and prevents children from gaining self-confidence. Any person who has not completed his compulsory education and who is under the age of 15, unless a higher age is specified in the national laws, must not be employed. The employees who are under the age of 18 must not be employed in such works that pose danger and in night works for the purpose of meeting their educational needs.

3.c. Fair Working Conditions

The suppliers shall comply with the applicable laws and sector standards in respect of the working hours and official holidays. The suppliers must act in compliance with the legislation in giving to the employees the salaries that they deserve and pricing the compulsory labour and overtime hours. The suppliers must provide such conditions that prevent sexual harassment, sexual misconduct, verbal abuse, constraint or physical force and all kinds of similar treatments. The infringement of the immunities of the employees, in any way, by physical, sexual, psychological and/or emotional harassment at the workplace or in any place where they are present due to the work is in contrary to the law and the codes of conduct and must not be tolerated, in any way, by the suppliers. The employees must have at least one day weekend holiday in every seven days.

4- CODES OF CONDUCT

4.a. Protection of information and personal data

Our confidential information, as Akdeniz Chemson, is under protection by our company policies and the laws of the countries in which we are doing business. We comply with all of our policies aiming at protecting the confidentiality without compromising and we do not share our confidential information with third persons.

We process the personal data of our suppliers to the extent it is allowed by the legislations in order to develop our company processes and activities. We do not share such personal data with third persons without the consent of the data owners and in contrary to the national personal data protection legislations. We expect the same responsibility also from our suppliers.

4.b. Confidentiality and Protection of Trade Secrets

All kinds of information, including but not limited to the technical, operational or financial information which are not in public domain or which are not disclosed to the public by Akdeniz Chemson is considered confidential.

The supplier must keep confidential all of its information, know-how, methods or ideas, practices, methods, inventions, designs, works etc. which have not been known yet in the field of industry ("Trade Secret" or "Confidential Information") and must not disclose such information to third persons without the written approval of Akdeniz Chemson.

Akdeniz Chemson expects its Suppliers to respect to all information including intellectual property rights, trade secrets, sensitive and confidential information of Akdeniz Chemson and to take the necessary security measures for the protection of such information if they have access to this type of information in order to establish a sustainable relationship. It is certainly forbidden for the suppliers to use the

confidential information of the Company for their own interests or for the interests of the persons and entities other than Akdeniz Chemson.

4.c. Transparency and Conflict of Interests

Akdeniz Chemson is aware of the fact that the establishment of prudent and transparent relationships with the suppliers is of vital importance for the sustainability of their relationships. Akdeniz Chemson makes great efforts in order to evaluate all of its current and potential Suppliers equally and fairly within the framework of the objective rules. Any of the employees of Akdeniz Chemson may not act in contrary to the obligation to observe the Company interests in the best manner or may not be involved in any economic or other relationship that will cause the conflict of interests with the Suppliers.

Likewise, the suppliers also must avoid from such actions that cause non-conformity or conflict of interest. The conflict of interests arises when our personal interests prevent our capability of fulfilling our duties in an effective and fairly manner or leads to such a perception. Accordingly, our suppliers with whom we work may not be involved in any economic or other relationship to cause conflict of interests also with the employees of Akdeniz Chemson.

It is forbidden to do business directly with the spouse or another family member or relative, employed by Akdeniz Chemson, of a supplier's employee during the supplier negotiations or the fulfilment of the obligations of the supplier.

Akdeniz Chemson has established certain rules as to the gift or entertainment offers received from our Suppliers for the purpose of protecting its employees from the conflicts of interests that might arise from the acceptance of gifts and entertainment and executing a proper, prudent and fair purchase policy in the purchase processes of Akdeniz Chemson. Any gift with a value above 100 USD, which gives an impression of the existence of any fraud, which might cause dependency relationship or might be perceived so, which is sent by the supplier and for only once a year is not accepted. However, any gift is not accepted at the tendering, investment or bidding stage even if within the limits. The employees of Akdeniz Chemson may accept the gifts having symbolic value such as plaques and plates granted at the meetings or seminars which they attend on behalf of the Company, day planners, calendars, pens, products bearing the company logo and the foods, the rejection of which might be traditionally perceived as impoliteness.

However, in the activities which are funded or the expenses of which are undertaken by the suppliers (recreation, free training, seminar, accommodation, trip, meal etc.), strict attention should be paid to the circumstances that might lead to potential conflict of interest in terms of influencing the decision-making processes, such activity must not be carried out in a manner that it might impair the decision-making mechanism of the employees of Akdeniz Chemson and in improper places. Our Suppliers are expected to comply with this issue and to avoid giving a gift or providing a similar advantage except for those specified above to the Company employees. It is definitely forbidden to give any sort of cash or cash equivalent gift.

5- OCCUPATIONAL HEALTH and SAFETY

Occupational Health and Safety is a prerequisite for us, as Akdeniz Chemson, and we pay strict attention to this issue. Therefore, all of the occupational health and safety standards required within the framework of the national legislation must be fulfilled by our Suppliers and all of our Suppliers must provide a healthy and safe working environment for their employees. The notifications that include all statutory legislations

must be made by the Employer to its employees in respect of the occupational health and safety. Furthermore, all Suppliers providing service at the plants owned by Akdeniz Chemson must act in compliance with the occupational health and safety rules adopted and applied by Akdeniz Chemson.

6- REGULATIONS RELATED TO ENVIRONMENT and PROTECTION

Akdeniz Chemson attaches great importance to the protection of our environment and makes effort to minimize the effects of the production processes and their products on the environment. Akdeniz Chemson expects its suppliers to provide assistance in fulfilling this commitment. Akdeniz Chemson requests from all of its Business Partners to protect the environment with a sense of sustainable production. The Business Partners must fulfil the requirements stipulated in all kinds of global and national environmental legislation and take the necessary measures at any stage of the production.

7- RESPONSIBILITY and REMEDIAL ACTIONS

Akdeniz Chemson requests from all of its Suppliers to accept this Code of Conducts for Suppliers and to act in compliance with the Code of Conducts for Suppliers.

It is completely under the Suppliers' own responsibility to act in compliance with the Code of Conducts for Suppliers. The Suppliers, by establishing a business relationship with Akdeniz Chemson, agree that Akdeniz Chemson reserves the right to unilaterally make amendments to the Code of Conducts for Suppliers from time to time and the Code of Conducts for Suppliers can be accessed via akdenizchemson.com/downloads.

If you notice the potential breach of this Code of Conducts for Suppliers or the legislation in force, you must promptly report this circumstance to the Company. You can forward all of your queries regarding the Code of Conducts for Suppliers to the address of satinalma@akdenizchemson.com