



GLOBAL

CODE OF

CONDUCT

Our commitment to ethical business
for sustainable development in line
with our principles of responsibility
and transparency



Be eurotec®

Be Good



Be Honest



Be Fair



Be Accurate



Be Reliable



Be Respectful



PREFACE

As Eurotec Engineering Plastics Industry and Trade Inc., we commit to conducting ethical business worldwide, adhering to the principles of responsibility, transparency, and sustainability in our business activities. In this context, we aim to contribute to the sustainable development of both our company and society by embracing and implementing the United Nations Global Compact. **This document has been created to ensure that our ethical behavior guidelines are understood and adopted by our employees and business partners. Full compliance with these rules is essential for our employees.**

In the event of any non-compliance with these rules, the person identifying the issue must report it to the Ethics Committee verbally or in writing.

Reporting Channels:
etik@eurotec-ep.com (Internal)
compliance@eurotec-ep.com (External)

The Eurotec Board of Directors reserves the right to modify, cancel, or replace this printed document with an alternative document or practice.

The current version of this document is maintained digitally.

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BUSINESS ETHICS



Conflict of Interest

- ◆ All company employees may establish a business relationship with their spouses, relatives, or friends only with the knowledge and approval of senior management. No discrimination or favoritism is applied to candidates who have not been successful in the necessary tests and interviews during recruitment.
- ◆ Company employees cannot be involved in jobs that would label them as “merchants” or “traders.”
- ◆ Without the approval of the Board of Directors, employees cannot be board members or auditors in companies outside the group, nor can they hold positions in any company that is a competitor of the company or has a business relationship with the company.
- ◆ Employees may actively participate in non-profit, consulting organizations, and social responsibilities undertaken on a voluntary basis, provided that they do not neglect their duties in the company.
- ◆ Political activities are not conducted within the company. Company resources cannot be used to support any political activity.

Corruption

- ◆ The company adopts a zero-tolerance policy towards corruption or bribery.
- ◆ Employees cannot offer or accept bribes directly or indirectly from any individual or organization. Employees suspected or found to be involved in bribery and corruption must be reported to the Human Resources department immediately.
- ◆ Employees are obligated to act in accordance with the Anti-Corruption and Bribery Procedure in all activities carried out with Company Stakeholders and Third Parties.

Confidentiality and Data Protection

- ◆ Sharing and disclosing any kind of commercial, technical, financial, etc., information belonging to the company and its business partners with third parties unrelated to the business is prohibited.

- ◆ The use of company information assets must be in accordance with the Asset Management Procedure. Employees must pay attention to the identification, storage, and sharing of information assets according to the relevant procedures and Information Security Policies.
- ◆ Any information of a personal data nature cannot be stored or shared by company employees without the consent of the relevant parties. Employees are obliged to act in accordance with the Personal Data Protection Procedure.

Compliance with Laws

- ◆ Employees must comply with Turkish laws and international agreements in their relevant areas of activity and conduct all activities in compliance with the relevant laws and regulations.

Competition

- ◆ Employees are strictly prohibited from obtaining sensitive information belonging to competitor companies and sharing sensitive information such as Eurotec’s prices, costs, customer lists, strategies, formulations, investments, etc., with third parties.
- ◆ A policy of full compliance with competition legislation is implemented. Employees found to be acting contrary to the legislation are referred to the Disciplinary Committee.
- ◆ Exchange of information and secret meetings to determine competition conditions with competitors and third parties are prohibited.
- ◆ Honesty, fair competition, and adherence to commercial ethics are demonstrated in our business activities.

Gifts, Aid, and Invitations

- ◆ Company employees cannot request gifts from customers/ subcontractors/suppliers and other companies and individuals with whom the company has commercial relations, nor can they accept any gifts, money, checks, property, free holidays, or special discounts that would obligate the company. (Gifts received at New Year such as books, agendas, flowers, chocolates, etc., are excluded from this scope. The value of such gifts cannot exceed the value determined by senior management.)

HUMAN RIGHTS AND WORKING CONDITIONS



Occupational Health and Safety

- ◆ Our company adopts 100% compliance with legal obligations regarding Occupational Health and Safety. Creating a safe, healthy, and hygienic working environment for our employees is a top priority.
- ◆ Our employees are obliged to comply with the procedures, instructions, and rules established in this regard.
- ◆ We adopt continuous improvement with our specialized consultants and employees to prevent all possible accidents, incidents, injuries, near misses, and occupational diseases; we value employee participation, ideas, evaluate them, and implement them without delay. The safety and security of our visitors and temporary contractors are also important, and our company practices and rules apply to them as well.

Working Hours

- ◆ Working hours are determined in accordance with the limits set forth in the Turkish Labor Law. In exceptional cases, overtime work may be performed, but the overtime hours specified in the law cannot be exceeded. Voluntariness is essential for overtime work, and payments for overtime cannot be made below the rates specified by law. Overtime hours and individuals are determined in a manner that does not increase the likelihood of occupational hazards.

Fair Pay and Benefits

- ◆ Our company's wage policy takes into account all current legal and regulatory requirements.
- ◆ Success is rewarded through an objective and effective performance evaluation system.

Union

- ◆ We respect the right of employees to establish a union and to collectively bargain freely and democratically. No discrimination is made against any employee due to organized union activities conducted in accordance with regulations.

Discrimination - Harassment

- ◆ Employees cannot display exclusionary behavior regarding all issues that may cause discrimination, such as gender, age, belief, language, race, ethnic origin, marital status, sexual orientation, disability, etc.
- ◆ Employees must refrain from any behavior that is verbally or physically derogatory, humiliating, offensive, harassing, or discriminatory towards each other or business partners.

Forced Labor

- ◆ Company employees cannot be forced to work. Compliance is subject to the minimum working age declared by national laws and regulations and conforms to relevant International Labor Organization (ILO) standards.

Child Labor

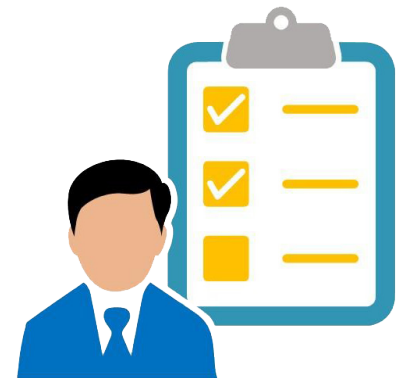
- ◆ Child labor is not permitted in the company, and effective measures are taken to prevent it.

ENVIRONMENT



- ◆ Our company conducts its activities in compliance with legal requirements and international regulations concerning all environmental issues.
- ◆ We embrace sustainability principles to reduce the environmental impact of our business activities and fulfill our responsibilities.
- ◆ We ensure efficient use of natural resources and reduce waste production throughout the supply chain, make efforts to combat climate change.
- ◆ We enable our employees to act with environmental awareness in their work through continuous education on environmental issues. We contribute to creating environmental awareness through social responsibility projects.

OTHER RESPONSIBILITIES OF OUR EMPLOYEES



It is important for all our employees to exhibit behaviors that are in line with the company's mission, vision, and values and to fully comply with the established rules. This is vital both to maintain the company's ethical standards and to provide an efficient working environment.

1. Knowledge and Understanding of Company Policies

Our employees must fully understand and implement the company's policies and procedures. These policies are presented to employees in detail during the recruitment process and after starting work, and are explained in training sessions.

2. Correct Use of Corporate Resources

It is necessary to use company resources, materials, and assets correctly and effectively. Material waste or misuse of resources is unacceptable.

3. Preservation of Company Image

Employees are responsible for maintaining the

company's reputation and image. Behaviors that could damage the reputation should be avoided, and professionalism should be displayed in all communications representing the company.

4. Employee Participation

Employees should embrace participation, transparency, impartiality, and continuous improvement in fulfilling their duties.

5. Ethics

Employees must not engage in behavior or practices that involve any form of harassment, coercion, or abuse and must not abuse their duties.

6. Compliance with Standards

Employees ensure full compliance with standards and regulations and keep up to date. Compliance with legal requirements is crucial to maintaining the company's reputation.



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