

## ETHICS POLICY

### 1. PURPOSE and SCOPE

#### 1.1. Introduction

Hereby Ethics Policy (“Policy”) sets out the Ethical Principles and Rules of CFN Kimya Sanayi ve Dis Ticaret (“CFN Kimya” and “the Company”) and its Subsidiaries regarding its relationships with its employees, state institutions and organizations, shareholders, and all other stakeholders in the course of its business.

#### 1.2. Purpose

The purpose of hereby Ethics Policy is to create a shared ethical understanding within CFN Kimya, to define behaviors that could damage the Company's reputation and prestige, to inform employees about preventive mechanisms to avoid all kinds of inappropriate behavior and ethical violations, and to be a guide for employees in behaviours in accordance with the law and the Company's Ethics Policy in the performance of their duties.

In case of any conflict between the principles stated in hereby policy and current applicable laws and official practices, the provisions of the legal regulations shall prevail.

#### 1.3. Scope

Ethics Policy targets global reliability and integrity for CFN Kimya's employees, customers, suppliers, business partners, competitors, state institutions, and other relevant stakeholders, and sets out the guidelines and body of rules that company employees must comply with.

Company employees leads in order to achieve the goals of hereby policy, avoid from all unethical practices and behaviors, and act determinedly to prevent unethical practices when necessary and to respond appropriately in situations requiring to take counter-actions.

### 2. DUTIES AND RESPONSIBILITIES

#### 2.1. CFN Kimya Sanayi ve Dis Ticaret A.S, Its Subsidiaries and Employees

All employees comply with Ethics Policy of the Company. In this context, they ensure that they comply with the principles set forth in hereby policy to the maximum extent possible when acting on behalf of the Company and carrying out its works and activities.

Employees are obliged to report any suspicious situation to the Ethics Committee via the Ethics Hotline without any delay.

The Ethics Hotline may be accessed through the following channels.

Telephone: 0 (850) 231 94 50

Internet Address: <https://cfnkimya.etikmerkezi.com>

## ETHICS POLICY

### 2.2. The Board of Directors

The Board of Directors is responsible for determining ethical principles, formulating and approving them as policy, and ensuring compliance with the policy by all stakeholders. The Board of Directors fulfills this responsibility through the Ethics Committee.

The Board of Directors is responsible for creating the necessary reporting mechanisms in order to detect and report violations of the principles stated in hereby Policy, for establishing an Ethics Committee that will be responsible for investigating and examining such reports, ensuring the necessary sanctions to be applied and the implementation and follow-up of the actions to be taken, and for appointing the Chairman and Members of the Ethics Committee.

### 2.3. Ethics Committee

The Ethics Committee is responsible for appointing the Board of Directors as well as the implementation of hereby policy and for monitoring and supervising ethical and compliance matters. Details regarding the role, responsibilities, and operation of the Ethics Committee are defined in the YT.002 Ethics Committee Regulation.

### 2.4. Human Resources Department

Human Resources Department is responsible for recording any violations of hereby policy in the employee's personal file and taking action according to the disciplinary procedures set out in the YT.002 Ethics Committee Regulations.

It is also responsible for ensuring that new and existing employees receive the necessary trainings and information about the policy.

The Human Resources Manager is among the permanent members of the Ethics Committee.

### 2.5. Suppliers and Business Partners

Suppliers and Business Partners of CFN Kimya Sanayi ve Dis Ticaret A.S. are required to comply with the principles defined in the company's Ethics Policy and other relevant regulations. Potential violations will be evaluated by the Ethics Committee, and if necessary, the Committee will take appropriate actions, including termination of the employment relationship with the company or its employees.

### 2.6. Compliance Officer

Compliance Officer is responsible for the implementation of hereby policy as well as other compliance matters within the Company, monitoring non-compliances with policy, reporting non-compliances to the Ethics Committee, and submitting requests for updates and changes to the policy to the Board of Directors through the Ethics Committee when necessary. The In-House Lawyer works as the Compliance Officer.

## ETHICS POLICY

### 3. OUR PRINCIPLES AND VALUES

CFN Kimya has focused on the following principles when defining its corporate values:

- Moral integrity is at the bottom of all values.
- It cares about people, society, and the world.
- It behaves bravely.
- It develops for continuous growth.
- It achieves success through perseverance and determination.

Hereby policy has been prepared in consideration of the values listed above. However, our employees are expected to always comply with the following principles while implementing our company values.

#### 3.1. Being Fair

It is required to show a trustworthy and fair approach to employees, customers, the public, partners, the board of directors, and all other stakeholders. The company shows an equal approach to all countries, institutions/organizations, legal entities, foundations, or individuals without any benefit outside of the business.

The company shows a sensitive approach to social and public issues and values. Environmental protection, education, social development, and a democratic and fair approach are the most important ones among the company principles.

#### 3.2. Accountability Through Good Governance Tools

It is essential that duties within the company are performed in an accountable and responsible manner. For this, the documents related to company activities are required to be kept, stored, and completely presented to the Ethics Committee upon request.

#### 3.3. Transparency

Information other than trade secrets and the company's intellectual property are required to be presented within the company in a timely, accurate, complete, understandable, interpretable, and easily accessible manner.

### 4. APPLICATION PRINCIPLES

While managing its business and processes, the company considers the risks of Ethics and Compliance violations in the following areas, in consideration of the main principles listed above:

## ETHICS POLICY

### 4.1. Fighting Against Bribery and Corruption

As a company, we have embraced a zero-tolerance policy in fighting against corruption and bribery. All CFN Kimya employees avoid spoiling or exhibiting any behavior that could be perceived as corrupt while performing their jobs and duties. The products that may be considered as bribery, include, but are not limited to, the followings in general:

- Those affecting the decision-making process,
- Those that may create a violation of legislation,
- Those that may be perceived as bribery by the public in the natural course of life,
- Those that may prevent the functioning of fair time and process mechanisms when performing a task or making a decision,
- Those causing the acquisition of corrupt benefit in any activity,
- Any benefit, promise, gift, or product with material or intangible value.

### 4.2. Conflict of Interest

Conflict of interest refers to a hidden economic or personal benefit which a company employee acquires from transactions and commercial activities related to CFN Kimya with company customers and suppliers and which will negatively impact the employer. In order to speak of the existence of a conflict of interest, the economic or personal benefit acquired must not have been disclosed to the employer. A conflict of interest is not required in order to speak of the existence of a conflict of interest, the existence of a potential tangible or intangible benefit and the potential to influence decisions are sufficient.

Not every suspicious situation constitutes a conflict of interest, nor does every conflict of interest constitute a non-compliance. The non-compliance is the failure to disclose suspicious situations and potential conflicts of interest to the relevant persons. The situations where potential conflicts of interest may arise and the principles for managing them appropriately are shared below:

- The investigation of the existence of conflicts of interest among company employees begins with the employment process. If an employee has, or may have, a first or second-degree line of descent (parent, paternity) with other company employees during their contract of employment, it is mandatory to report this situation to the Compliance Officer. This situation is presented to the Ethics Committee, and a decision on recruitment or continuation of employment is made in accordance with the result of the conflict of interest assessment.

## ETHICS POLICY

- Company employees shall not use their duties, positions, and authorities within CFN Kimya to provide personal benefit to themselves, their family, relatives, or 3rd parties. While establishing all business relationships and conducting activities, they carry out works, agreements, operations and processes by prioritizing CFN Kimya's interests.
- Company employees shall not obtain personal benefit from institutions/organizations or individuals with whom they have business relationships by using the rights and/or authorities provided by their positions.
- It is required to be careful about potential conflicts of interest with family members/relatives working at competing companies. It is required to inform the Compliance Officer in case of any family members working this way, and to inform Human Resources Department and the Ethics Committee in suspicious cases.
- Company employees are prohibited from working with another person or corporate for personal benefit or business purposes during working hours. For works outside of regular working hours, exceptions may be applied, provided that the relevant manager and the Human Resources Manager are informed and that they give their written approval, and that the organization where the employee works is not a competitor, customer, or supplier of CFN Kimya. This situation is evaluated by the Ethics Committee, and the employee are provided with notification of leave state.
- Provided that they will not hinder their dutie, the employees may work for non-profit foundations/associations/universities by avoiding the behaviors that may damage CFN Kimya's reputation, and that they will obtain written approval from the Human Resources Manager and the Ethics Committee, respectively.
- No discrimination based on ethnicity, language, religion, or race may be made against employees, and no political views may be imposed.
- Employees may work within a political party, provided that it does not damage the company's reputation or that the company maintains an equal manner towards all political views within the company, and only with the joint decision of the Ethics Committee, CEO, and Board of Directors.
- In case of a conflict of interest or in case exceptions apply depending on special circumstances, the relevant Company employee shall act consulting with their superior manager, Compliance Officer, and Ethics Committee.

If a CFN Kimya Company employee finds himself/herself in a situation where they suspect if there is a conflict of interest, he/she may question the situation and make a decision based on the following questions:

- *Is my situation and the decision that I will take in compliance with ethical principles of CFN Kimya?*

## ETHICS POLICY

- *Do I need to take a decision? Do I have the authority to take this decision? Could the decision that I will take cause a negative effect on my objectivity? Even if it doesn't have an effect, could it be perceived that way from outside?*
- *Will I acquire a personal benefit from this situation, even if it is not against CFN Kimya?*
- *Will the decision that I will take result in a financial loss for CFN Kimya?*
- *Will the decision that I will take create a risk against / a reputational risk for CFN Kimya?*

### 4.3. Use of Company Resources

CFN Kimya uses all its tangible and intangible assets and resources only for the company's business and activities in accordance with their intended purpose, and it is avoided using these for personal benefit or the benefit of third parties.

Assets and resources of CFN Kimya employees refer to, including, but are not limited to the followings:

- Cash and cash equivalents available for their use and access,
- Intellectual and industrial property rights,
- Tools, equipment and materials used,
- Raw materials,
- Technological infrastructure, tools and equipment,
- Trade secrets, etc.

CFN Kimya assets are not allowed to be used for the personal needs of employees (such as personal vacation expenses, clothing, etc.), and company employees cannot make requests in this direction. Company employees exercise utmost care to utilize and protect all tangible and intangible resources and assets provided to them in the most efficient way.

In line with ensure the efficient use of company resources, the option with the highest effectiveness/efficiency for the company is chosen, provided that the company's ethical principles are complied with and business requirements are adequately met in agreements and partnerships with third parties and in supplier selections.

### 4.4. Company Secrets, Privacy and Protection of Personal Data

Information that includes confidentiality;

- Intellectual, industrial, property and trademark rights,

## ETHICS POLICY

- All kinds of innovative ideas, applications and projects developed by employees, business strategies and steps taken in this direction, investments, financial statements, technical information, marketing activities and business plans, employee information, customer information, partnerships and business partners, etc., and all documents that can be read on written, oral and electronic devices.
- Information defined as "confidential information" within the scope of the Confidentiality and Non-Competition Agreement.
- Including, but not limited to all information that has not been disclosed to the public.

CFN Kimya employees are obligated to protect all confidential information that they access in the line of their work and to comply with POL.006 Information Security Policy. The information in question is not allowed to be taken from or shared outside of CFN Kimya without the approval of senior management. Even in case of sharing the confidential information under senior management approval, confidentiality agreements is required to be signed with the sharing party before sharing takes place.

Company or employee personal information may only be shared for company purposes and within the scope of specific authorizations granted by company officials. Individuals and departments having such information must act in accordance with the obligations arising from the relevant agreements.

In case company employees leave the company, they are not allowed to remove any confidential information, trade secrets, customer information, and the aforementioned confidential information and documents obtained in the line of their work, nor allowed to use these, in writing or verbally, for their own benefit or the benefit of third parties.

Private and confidential documents related to suppliers and other business partners acquired as a result of partnerships, business agreements, etc., are also kept confidential in consideration of the principles mentioned above and are not shared with third parties.

Passwords and usernames used by company employees to access systems, computers, and other information technology infrastructure are not shared with other employees and their confidentiality is protected.

It is the responsibility of all Company employees at every level to take the necessary measures and comply with these measures in order to prevent the disclosure of the confidential information listed above and to ensure it is properly protected. All changes/updates to confidential information are recorded along with its history.

It is ensured to act in compliance with legal regulations and legislation regarding the protection of personal data within the scope of personal data confidentiality and protection.

## ETHICS POLICY

### 4.5. Accepting and Giving A Gift, and Representation & Hospitality

Company employees acts in accordance with the aforementioned Anti-Bribery and Fight Against Corruption principles regarding gift-accepting-giving, representation, and hospitality and avoid gifts and hospitality that exceed the business purpose.

#### 4.5.1. Giving and Accepting a Gift

It is not allowed to accept gifts in exchange for promising to do something for customers or suppliers. Similarly, it is not allowed to send gifts in exchange for a promise to perform a task.

It is not allowed to explicitly request gifts from /or offer gifts to customers or suppliers. Reasonable, non-cash gifts may be accepted or given in good faith and within the context of the business relationship. The material value of reasonable gifts is limited to 200 USD or its equivalent annually, received from or given to one single source.

Employees are required to avoid and reject accepting any gift that could potentially affect their decision-making, objectivity, and performance, regardless of the specified material limit. In the same direction, CFN Kimya employees are not allowed to offer gifts, as well.

CFN Kimya employees may accept gifts or souvenirs such as plates and etc, at events where they participate as speakers or attendees, provided they obtain the approval of their Manager and Compliance Officer.

However, they absolutely are not allowed to accept money or items that can be converted into money in return. It is required to report information related to all gifts received to the Human Resources Department in order to be kept under record.

Gifts received on behalf of CFN Kimya and deemed appropriate to be distributed to employees are decided upon and distributed by the company's senior management, considering the principle of fairness.

#### 4.5.2. Representation & Hospitality

Making statements to any broadcasting organization, making interviews, participating as a speaker in seminars/conferences, etc., are subject to the approval of the company's senior management. No personal benefit may be obtained from these activities.

CFN Kimya and its Business Partners may pay each other's food, travel, and accommodation expenses while working efficiently on a project or carrying out operational activities. However, the following criteria must be observed in order to avoid situations that are not in compliance with legal regulations and CFN Kimya policies:

1. There must be an ongoing or potential business relationship with the counterparty within the framework of a lawful business interest.

## ETHICS POLICY

2. The activity should not be repeated at regular and periodic intervals.
3. The activity should not be excessive or disproportionate. In other words, the value or nature of the activity should be appropriate to the business relationship and should not be carried out in inappropriate places.
4. Entertainment activities should not negatively impact the fair and objective decision-making process or lead to negative perceptions from the outside.

### **4.6. Fair Competition**

As a company, we act in accordance with all relevant legislation, primarily the Law on the Protection of Competition, and organize our relations with competitors or other individuals or organizations within the limits permitted by law. It is ensured to comply with competition law regulation without exception, and the opinion of the Compliance Officer is taken in suspicious cases.

It is required to avoid behaviors that could directly or indirectly lead to results that violate the principle of free competition, and to act in accordance with the principle of fair competition in our relations with competing companies. It is not allowed to establish agreements or commercial relationships with competitors, customers, or other third parties or institutions that prevent or restrict competition. It is required to avoid policies that may create a dominant position in the market.

Information may be collected about the market and competitors in compliance with fair competition conditions by nature of our business manner. However, these activities are required to be carried out in compliance with legal regulations and ethical principles. In this context, public domain or publicly shared information and resources are required to be used. It is required to avoid acts that would create the impression of non-compliance with the principles of fair competition.

### **4.7. Donations, Sponsorships, and Memberships**

Decisions regarding sponsorship, aids or donations to individuals or entities with whom the company has a business relationship can only be made by the Board of Directors. The company may make monetary and in-kind donations to non-profit institutions, organizations, or activities with the approval of the Board of Directors and the knowledge of the Compliance Officer.

Company employees may become members of non-governmental organizations (NGOs), that are compliant with company policy, for public interest and may participate in the activities and events within these organizations.

Membership in any NGO and participation in the activities of the relevant organization on behalf of the company is carried out under the knowledge and approval of the relevant manager and the Compliance Officer.

## ETHICS POLICY

### 4.8. Public and Public Relations

As a company, we treat all state institutions and organizations, public officials, civil society organizations, political parties, and individuals with equal approach and objectivity in our activities and works. It is not allowed to be in a relationship based on benefit that would compromise the principles of equality and objectivity in our relations with these institutions and individuals.

The purpose of company is to strengthen the corporate image by showing an approach compliant with our main principles of public and public relations, reliability, fairness, transparency, and accountability. In this context, information that is required to be shared with the public, is shared in a timely, understandable, accurately and in compliance with the relevant regulations.

### 4.9. Occupational Health and Safety

The main purpose of company management is to fully ensure Occupational Health and Safety with a zero-tolerance approach. In this context, all employees, suppliers, business partners, and customers of the Company embrace the principle of health and safety-oriented work.

All employees of the Company are aware of the risks related to Occupational Health and Safety in their work environments and comply with the work environment, rules, and the POL.003 Occupational Health and Safety Management Policy established to avoid these.

The company and all its employees follow local and international regulations and standards related to Occupational Health and Safety and show a maximum effort to comply with these.

### 4.10. Use of Social Media

While expressing opinions in our press relations and on social media platforms based on our duties and/or personal preferences, company employees act with the awareness that our opinions may be identified with our Company. Even if in their own personal social media platforms, they consider that their personal posts may pose a risk to the Company and thus, they make their posts according to this fact. They do not make posts, the contents of which are derogative for the Company's competitors, customers, and suppliers, in any way. Employees avoid using work computers and company networks allocated for their use by the Company to access personal social media accounts during working hours and are responsible for complying with the rules defined in PR.036 Digital and Social Media Usage Procedure while using social media.

### 4.11. Compliance with Laws and Regulations

All employees are required to comply with the rules, laws, and regulations determined by the Company and to avoid behavior that appears inappropriate and that is contrary to the principles stated in hereby Policy by using their sense of reasoning.

The Company carries out all its local activities in accordance with the laws of Turkish Republic.

## **ETHICS POLICY**

### **4.12. Fight Against Money Laundering**

CFN Kimya will not establish any commercial relationship with any legal or real person who has been identified by official authorities as being involved in any criminal activity or obtaining income through unlawful means, and will terminate any existing commercial relationship as soon as it becomes aware of this.

### **5. TRAINING ACTIVITIES**

Personnel at all levels within the company are informed about the principles and responsibilities set out in the Ethics Policy as a natural part of the employment process.

In this context, every new employee receives the necessary training and information about the policy within the framework of a plan organized by Human Resources Department , and signs a letter of commitment stating that he/she has been informed about the policy and he/she has understood his/her responsibilities, which will be kept in his/her personnel information files as part of his/her

The Ethics Policy is always accessible to all employees through the company portal.

### **6. ENFORCEMENT**

Hereby policy shall enter into force as of the date of its approval by the Board of Directors. In case of need for updates or changes to the Policy, the Compliance Officer shall make the necessary corrections, obtaining the approval of the Ethics Committee, and submit them to the Board of Directors for final approval.

### **7. RELEVANT DOCUMENTS**

YT.002 Ethics Committee Regulation

POL.006 Information Security Policy

POL.003 Occupational Health and Safety Management Policy

PR.036 Digital and Social Media Usage Procedure

### **8. ANNEXES**

There is no any additional form referenced in hereby Policy.