

# Standard Profil Group Code of Ethics

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## CEO's Message

The main purpose of Standard Profil Group is to become, in the eyes of all its stakeholders, a reliable company which conducts business with the highest ethical standards and always keeps its promises no matter what. We know that, in present conditions, the way to carry our Group to a leading position in the future is to conduct our work in a complete and honest manner. Our reputation is the most important asset of our business methods which is a direct result of our ethical management culture. The foremost way to protect our reputation is to become a brand that never compromises its ethical rules.

In business life where success and reputation are strongly bound together, it is everyone's duty as a member of Standard Profil family to embrace and apply the rules, policies and principles of Standard Profil Code of Ethics.

Standard Profil Ethics rules, principles and policies that are published within the scope of these rules commit that all business relations with the customers, partners and competitors of the Group shall be based on honesty and ethical behaviour. Our Group regards the highest ethical business standards as the keystone of our growth oriented future strategy.

Standard Profil Group absolutely rejects all non-ethical decisions and behaviors.

Our Ethics' Code shall be a useful and enlightening resource which will also act as a guide to shareholders, business partners and all of us in this Group in order for us to understand and fully grasp the ethical manner of conducting business within the scope of our ethical values.

Standard Profil's work ethics approach and applications are much more than written norms: they are a part of the backbone of our corporate culture. We have collected these principles in a handbook which will easily be accessible to all of us.

I request all employees of Standard Profil to embrace these principles and benefit from this booklet for reference. I also request from you to consider being responsible of complying and guiding others for their compliance with the content of this handbook.

Turhan Semizer - CEO

## 1. Our Duties Regarding the Implementation of Standard Profil Code of Ethics

Our Code of Ethics consist of the regulations regarding the basic ethical principles and working rules that must be applied by our employees during the execution of their duties.

Our purpose in the creation of our Ethics Code is to prevent incidents that may damage the sense of trust or may reduce employee commitment thus harming our corporation and us due to potential disputes, conflicts of interest or improper actions that may arise between all our related stakeholders including our employees and ourselves.

The Ethics Code serve as a guideline for our mode of ethical business conduct and these codes must be evaluated in conjunction with the Group's every other policy and procedure.

Chapter 4 of this document defines the implementation of the code of ethics and reporting mechanism of ethical issues.

### **Behaviors Expected From Standard Profil Group Employees**

#### ***Compliance with Standard Profil Ethics Code and Laws***

Standard Profil Group employees are expected to understand the code of ethics and behave in compliance with these codes and the laws in all of their present environments. They are required to make good use of their reasoning and not allow circumstances which may seem improper.

In order our employees to be able to assist the management of a high level moral culture and environment creation within Standard Profil Group, they are expected to understand the code of ethics, reflect them in their jobs and endeavor to always do the "right" thing. If they are unsure of what to do with respect to a matter, they should not be afraid to ask their hierarchical manager, Human Resources or Internal Audit.

#### ***Behaviors Expected From Executives***

To Comply with the Code of Ethics and Laws and to Encourage their teams with Ethical Behavior Culture.

Executives must always act as a role model for the right behavior at all times. As an executive:

- You must ensure that all employees in your team understand their responsibilities which are within the framework of the Code of Ethics and other Company policies.
- You must create opportunities for the Code of Ethics to be discussed and encourage your employees with regards to the significance of business ethics and compliance.
- You must create an environment where employees can express their opinions easily without hesitation.
- You must consider the Code and other Company policies when evaluating Employees' performances.
- You must never encourage or orient employees to make decisions letting them commit acts which may lead to the compromise of the ethical management, codes or laws.

- You must not permit employees within your team to violate the Code of Ethics or laws.

**Review Your Acts and Consult**

In circumstances where you are in doubt with respect to your conduct, ask yourselves:

- Is the situation in compliance with the Code of Ethics?
- Does it seem ethical?
- Is it legal?
- Will this situation reflect on my Company, our Group and me positively?
- Would I want to read about it in the newspaper?

If your answer to any one of these questions is «No», do not commit such act.

All Standard Profil employees must evaluate whether their own and/or colleagues' behavior are in compliance with the code of ethics. If any difficulty is faced in making such evaluation or if it is thought that the conduct is unethical; opinion of the Ethics Committee of Standard Profil must be obtained. Reporting decisions and conducts that are observed as not being compliant with business ethics is the common responsibility of each Standard Profil employee.

***It is not possible for the Code of Ethics to cover all possible circumstances that the employees may potentially be exposed to. When you are faced with circumstances that are not described by our Code of Ethics or corporate policies and procedures, do not hesitate to consult your supervisor or the Ethics Committee.***

## 2. Our Values and Ethics Principles

Standard Profil;

Always conducts business with its customers, suppliers and other business partners in an honest, fair and legal manner to ensure satisfaction of its customers' needs, which is Standard Profil's most significant priority.

Ensures that its employees work in a motivating and supporting social culture and conducts business in a healthy and secure environment.

Respects the environment, complies with environmental standards and gives its maximum effort to minimize energy consumption.

Endeavors for constant development in its work for the benefit of all its stakeholders.

Embraces the responsibilities and duties it has towards its customer and uses all kinds of resources available for the best effective solution.

In the event of a possible dispute or conflict of interest, carries out an evaluation from the perspective of the customer without prejudice; and tries to understand the root cause and the need.

Standard Profil's code of ethics do not only aim to prevent corruption within the Company, it also encourages the implementation of anti-corruption measures in all location that Standard Profil operates. By its strong commitment to anti-corruption principles, Standard Profil increases the reliability in the business environment.

### 2.1 Honesty, Righteousness and Transparency

Honesty, righteousness and transparency are the most fundamental principles of Standard Profil Group. Standard Profil protects and reflects its image, reputation and respectability in all fields it operates; in the best manner with strict commitment to these principles.

Internal and/or projects based information announced by Standard Profil, must be complete and accurate. Notifications made within the corporation, outside the corporation and to the public must be in accordance with the principles of righteousness and honesty. Standard Profil adopts the virtues of honesty, righteousness, transparency and business ethics in all its activities and notification, inside or outside the corporation, and avoids any conduct which may damage mutual trust. SP expects its business partners to have same values and act accordingly. SP builds its business affairs on the principle of mutual trust. Standard Profil trusts them and expects them to trust Standard Profil.

In any of its business affairs; if such environment of trust is damaged or fails and cannot be recovered; Standard Profil terminates its relationships with the relevant parties.

### 2.2 Confidentiality

Confidential information may be defined as; financial, strategic, technical, commercial information, personnel rights, matters within the scope of confidentiality agreements executed with third parties and similar information; which belongs to Standard Profil Group not known by third parties and if known, may cause loss for the company and/or its stakeholders or may benefit others.

The following information which is not announced or made available to the public by the Group is considered confidential information:

- Employee information, inventions, agreements, strategic and business plans, significant changes in management, new products launched in the market, mergers and acquisitions, technical specifications, pricings, offers, financial data, product costs,
- Information, transactions, computer software, technical information, materials, records, files, documents, programs, reports, notices, announcements, analysis, data, customer lists, commercial secrets and similar information belonging to Group Companies and third parties with whom business affairs are conducted and which are not available to the public; are considered confidential information.

Our Group employees are expected to protect the aforementioned confidential information and use them for company purposes only.

Standard Profil employees show diligence for the protection of information belonging to the company and all of its stakeholders. Our employees maintain and keep the information and professional secrets they obtain during the performance of their duties in accordance with the confidentiality policy; and share such information with the relevant persons within designated authorities only.

Employees leaving the company are not allowed to share confidential information with third parties. They are required to submit all confidential documents and/or electronic copy documents of the company that they obtained during the term of their employment.

The company respects the use of Employee information according to the local laws in place.

## 2.3 Human Rights

Standard Profil Group believes in and supports human rights absolutely in all places and environments it operates.

Standard Profil Group complies with the "International Labor Rules". In this respect, it adopts to the « Minimum Age for Employment» in line with the local law anywhere it operates.

Also in this respect, our group makes no discrimination with respect to the ethnic origin, gender, color, race, nationality, economic status, disability, age, religion and other beliefs. This is also applicable for recruitment and promotion; working conditions; and all relationships with customers, suppliers and partners.

Standard Profil employees, have the freedom to have a role and act as volunteers in non-governmental organizations and public interest services and other associations/organizations, by considering the working hours, sense of duty and responsibility. Additionally everyone has the right to freedom of peaceful assembly and to freedom of association.

## 2.4 Compliance with Laws

All Standard Profil Group companies and their employees are obliged to act in compliance with the local law where they operate and international law; both domestically and internationally. The SP Group companies are obliged to submit accurate, complete and comprehensive information to government agencies and institutions in a timely manner.

Our employees are not permitted to commit illegal acts for the sake of gaining commercial or personal interests.

It is essential that the financial and commercial records are correct and in compliance with the law.

Transactions carried out with governmental authorities are determined by special legal rules and differ from affairs conducted with the private sector. Company employees are responsible for knowing and understanding

such rules. In case of doubt, it is essential that the Company's Legal Counsel or the Ethics Committee is consulted with.

## 2.5 Our Human Resources Practices

To ensure human resources management of high standards, the fundamental principles of Standard Profil Group are summarized below:

- For the enhancement of the working environment, Standard Profil supports its employees to freely express themselves and undertakes the development of a relationship of mutual trust at all levels. All employees are entitled to work in a healthy; harassment-free environment per the legal regulations and customs of the countries of operation. Even if there is no superior-subordinate relationship; Standard Profil absolutely prohibits all kinds of sexual or moral harassment, all acts classified in the International Labor Organization's report under "Violence at Work" and actions deemed as "mobbing".
- In recruiting and promoting its employees, Standard Profil considers; the qualifications and skills required by the job and the performance of the person; as the fundamental tenet.
- It complies with the relevant laws and national regulations in respect to employment of the disabled and arranges supporting activities for their employment.
- Our Group's practices regarding prohibition of working in a second job and non-competition are summarized in Annex 1.

## 2.6 Quality and Constant Development

With its quality, services, technology and pricing; Standard Profil works with the aim to be the leading supplier and business partner of sealing profile systems in the automotive sector. One of the most important priorities of Standard Profil is to meet the needs of the customer and to ensure complete customer satisfaction. For this purpose, all employees, including the Board of Directors, undertake all kinds of duties on their parts.

Standard Profil not only observes the global competition, but also has a vision for the required ideal situation. While taking lessons from successes and failures, it has preserved its spirit and identifiable targets set since the time of its initial foundation.

Continuous improvements of product and service quality in line with customer needs and responding to demands completely and accurately in a timely manner are the most important targets of our Company. Exceeding and maintaining customer expectations with the appropriate technologies are the performance indicators that our Group is most sensitive about.

Standard Profil Group aims to,

- Ensure customer satisfaction at the highest level,
- Use decision-making mechanisms based on substantial data and information,
- Position its employees with high performance and potential to its most prioritized jobs.

It has become the Group's principle to implement management discipline and methodologies, which aim to constantly improve work processes and measure the effect of such improvements on material terms simultaneously with the leading firms of the world.

Philosophy and methodology suitable for customer quality standards in accordance with this principle; are used in improvement and development of projects.

## 2.7 Commitment to the Principle of Saving

It is Standard Profil Group's principle to prevent waste and to promote economy in its use of resources within its activities and during projects it conducts. These principles are taken into consideration in decisions making processes with respect to business and the internal audits.

Likewise, our employees have the same sensitive approach, as they have to their own family budget, towards the economic and highly efficient use of tangible resources of their entities. Each Standard Profil employee is aware that such course of conduct, which is adopted as a common corporate principle, shall prove a competitive edge to their companies.

## 2.8 Competition

Within Standard Profil Group,

- Honest and ethical competition is aimed to be achieved within the framework of the competition law and ethical rules; whereas unfair competition is avoided. Competition is carried out only on legal and ethical grounds.
- In relation to any kinds of activities initiated with the representatives of other companies, special sensitivity is paid in order to ensure that such shall not amount to an infringement, competition rules are all the times well-respected.
- Attempts to restrict or limit competition are not supported.
- Intentional slander and defamation of competitors are not accepted. Any undertaking regarding any services that Standard Profil cannot provide shall be avoided.
- Agreements between competitors for fixing or controlling prices; boycotting certain suppliers or customers; sharing products, regions or markets; or restricting production or sale of products constitute infringement of the competition law, such behaviors should be avoided.
- Since the rules are complex and differ from one country to another, employees should consult the Legal Department to request for explanation and information when necessary.

## 2.9 Environment, Health and Safety

Standard Profil is a socially responsible corporation that respects the environment, complies with environmental standards and rules, and constantly intends to reduce energy consumption and carbon dioxide emissions.

As Standard Profil, our purpose is to minimize the adverse effects that, our sealing profile production and other related activities may have, on occupational health, safety and environment.

Considering the principles of «Occupational Safety First» and «Respect for the Environment and Future Generations» in line with our aims and targets, we, as Standard Profil;

- Identify health, safety and environmental risks in our activities; take precautions; and control their effectiveness in order to prevent health deterioration, occupational accidents and environmental pollution.
- Comply with the relevant legislations regarding the environment, health and safety; and abide by the requests made by the relevant parties.
- Train and inform everyone who is affected by Standard Profil's health, safety and environment policies and procedures; and verify that they understand all.



None of the individuals or executives within our Group has the authority to behave in an inconsistent manner with the environmental protection policy, to permit any such behavior, to give instructions for such effect or to tolerate the same.

### 3. Relationships with Stakeholders

All our employees are obliged to prevent any kind of conflict of interest between the Group, Company and their individual activities which are determined in the following paragraphs.

#### Conflict of Interest

Our employees act in the best interests of our Company; do not provide benefits to themselves, their families, relatives, suppliers, customers, other employees, partners, competitors or with whom they have business relationships with through taking advantage of their current positions; arrange their relationships in such a manner not to impair the reputation of the Group.

In Standard Profil, conflict of company benefits and personal interests, obtaining inappropriate personal advantages or providing benefits to relatives or third parties using their positions are not permitted under any circumstances.

#### 3.1 Relationships of Standard Profil Group Employees with Their Own Companies

##### 3.1.1 Protection of Standard Profil Group's Reputation:

Standard Profil Group's business partners, customers and other stakeholders trust Standard Profil Group due to its professional competence and honesty. The Group strives to maintain this reputation at the highest level.

Our employees provide their services within the framework of the Group/Company policies, professional standards, the commitments made and the ethical rules; show the necessary devotion to the performance of their obligations. In areas where the Standard Profil brand is represented outside of Standard Profil, the employees do not express their personal opinions but the opinions of the company. For this reason, Standard Profil employees do not share information or remarks with the public that are not within the scope of the Group's corporate declarations.

Only those Standard Profil employees that are authorized with the related subject may represent the Group before the public within the scope of the conditions and matters of the subject that they are authorized for.

##### 3.1.2 Protection of Standard Profil Group's Assets and Resources

Our employees take all kinds of precautions necessary for the protection of Standard Profil's assets such as trademarks, reputation, intellectual capital (information assets), know-how, trade secrets and other technical information, etc.

Standard Profil Group not only protects its own rights but also respects others' assets and rights. Standard Profil Group endeavors not to work with those who, it believes, may damage the Group's virtues and assets, do not comply with the code of ethics and/or do not behave in accordance with the environment and health of the society.

They ensure that company's assets/resources are used efficiently during working hours, and use all company assets for business purposes only.

Information is one of the most critical categories of assets. In order to ensure that all the information assets are protected in accordance with the significance, value and sensitivity that they offer; all employees must abide by the Group's confidentiality instructions.

### 3.2 Relationships with Employees

Mutual trust is essential in Standard Profil employees' relationships with each other. Positive and transparent relationships are an indispensable part of the professional life.

Regardless of subordinate-superior relationships, humanitarian values are accounted for in behaviors and speeches and personal insults, humiliating statements and behaviors are refrained from both inside and outside of the workplace. Physical attack or contact aimed at violence is unacceptable.

Standard Profil employees must not enter into debtor/creditor, tenant/lessor, surety and similar relationships of benefit with their subordinates or superiors.

### 3.3 Relationships between Standard Profil Group Companies

Standard Profil Group is a complete unit with its products, customers and employees. In order to maintain such unity, our Group companies are required to feel the responsibility and behave accordingly.

Our companies operating in different geographies give priority to working with each other in procurement of products and services or business development of related areas; use the opportunities presented by the union of forces and share the best practices with each other. They do not project conflicting views externally and act coherently in certain harmony.

It is a requisite of both our corporate culture and the shareholding structures of several companies of our Group that intra-Group cooperation is carried out transparently, that it is based on previously identified depictions and standards, and that it complies with the Group's interests. The relationships of the Group companies with each other and their mutual transactions must comply with the market conditions and the laws.

### 3.4 Relationships with Customers

Within Standard Profil Group;

- Customer information is protected with the same sensitivity as if it were company's own information.
- Customers are approached with customer satisfaction point of view. All customers are treated with care, honesty and fairness that will generate the highest level of customer satisfaction loyalty.
- Customers' requests and expectations are taken into account and customer-oriented processes, products and services are structured accordingly.
- Customers' requests are approached proactively in accordance with the agreed terms. It is aimed to meet requests in a timely and accurate manner by constantly improving product and service quality based on the customer's needs.
- Products and services offered are under Standard Profil Group's assurance and guarantee.

- All customers are approached on the same grounds and are not treated preferentially. Customers are not provided with any tangible or intangible benefits such as unfair promotional and marketing allowance, gifts, etc.

Standard Profil aspires to always operate in favor of the customer. Investments provided by the customer must only be used in line with the business purpose of the customers. Equipment belonging to the customer and entrusted to the company must be used with care in accordance with the agreement terms.

### 3.5 Relationships with Suppliers

At Standard Profil Group;

- It is believed that the goods and services provided by suppliers directly affect the quality of the goods and services produced by the Company. In this respect, suppliers are selected among the entities operating at the desired quality and standards. For this reason, suppliers are considered as business partners.
- Supplier selection process is transparent and impartial.
- Current suppliers and suppliers that may be considered as potential vendors are treated in a fair and respectful manner. Necessary care is taken to meet the obligations on a timely fashion.
- Confidential information of suppliers with whom business is conducted with is protected with care.
- No business is conducted with suppliers that are identified as having violated laws and not having behaved in accordance with business ethics.
- Suppliers, brokers, sub-contractors may not be used to commit an act which is contrary to laws or code of ethics. It is absolutely unacceptable for employees to receive commission payments and any tangible or intangible benefits of similar nature from suppliers.
- Employees are not permitted to accept gifts which may adversely affect their objectivity on making decisions.
- While conducting their relationships with suppliers; employees act in a manner so as to avoid any impressions that may cause third parties to think that there is a relationship based on interest.

**Standard Profil Employees must abide by all applicable laws and are discouraged from acting in a manner inconsistent with the the accepted social norms of society. Accepting or giving personal, financial or non-financial gifts which shall create advantages and which affect our decisions regarding the business is against Standard Profil's ethical values and is considered as an offense. However, small gifts that are for advertisement purposes and remain within reasonable limits regarding the business may be accepted.**

**(See Annex 2 Gift Policy)**

### 3.6 Relationships with Society

Standard Profil employees act with the awareness of social responsibility, aim to perform their duties in areas they choose within their means. Standard Profil Group's high performance, productivity and profitability in fields of its activity are not only the Group's commercial success, but also its substantial contribution to the economies of countries in which it operates.

Standard Profil Group has chosen to work in a manner committed to the principles of "sustainability". In addition to the above, the concept of Sustainable Development also includes the principles of productive and profitable work and planning for the company's

**In our journey that starts by us earning our livelihood from the lands of this country and continues to expand to all corners of the world; we believe that our employees are our most precious assets. For a livable world, we aim to realize our social responsibility projects in all locations that we operate in by focusing on environment.**

future. Standard Profil plans its responsibilities towards the society within the principles of "sustainability" and contributes to the society with a sense of social responsibility.

All kinds of communication related with Standard Profil Group in social media (social networks, pages, groups activities etc.) can only be performed by the Corporate Communication Department, or by the employees and service providers authorized by the Corporate Communication Department.

### 3.7 Relationships with Shareholders

At Standard Profil Group,

- Shareholder relations are based on principles of trust and transparency.
- The primary purpose of the Company Management is the creation of perpetual value for shareholders.
- Financial data or all kinds of information necessary for decision-making must be communicated in an accurate and complete manner. People preparing such information are responsible for the information they prepare and must ensure that the related principles are complied with.
- It is essential to ensure that all business and finance records of the Company are accurate and in compliance with the Company policies and procedures as well as laws and regulations. Such principles are applicable not only for financial accounting records, but also quality reports, timing records, expense reports, claim forms and curriculum vitae and all other similar records.
- All kinds of information or events (lawsuit, quality risk, etc.) that may have a financial impact must be promptly notified to the Finance Department.
- No record, under any circumstances, may be distorted and fictitious records may not be entered in the books. No asset or property that is not registered in the name of the Company may be kept.
- Shareholder's expectations from the top management, instructions, decisions taken and implementations regarding such decisions are stated mutually in writing.

## 4. Implementation of Our Code of Ethics

The Ethics Committee is responsible for investigating and resolving complaints and notifications regarding breach of the code of ethics. The Ethics Committee which operates in affiliation with the Board of Directors of Standard Profil Group is composed of persons in the following posts:

- Chairman of the Ethics Committee: Chairman of the Audit Committee / BOD Member
- Member of the Ethics Committee: Audit Committee Member / BOD Member
- Secretary and Member of the Ethics Committee: Group Internal Audit Director
- Member of the Ethics Committee: CEO
- Member of the Ethics Committee: VP Human Resources

It is recommended to our employees to contact and consult to the following senior executives (in order) prior to contacting the Ethics Committee Line (if applicable):

- Related department's manager
- HR manager
- Plant general manager / Top senior executive responsible for the Country.

Notifications of Standard Profil Group employees' and 3<sup>rd</sup> parties to the Ethics Committee are kept secret. All examinations and investigations are conducted by independent experts in confidentiality. Any event of reprisal against an employee, who has raised a problem in an honest manner, means a breach of the Code of Ethics.

Members of the Ethics Committee may be contacted directly through the following means which are designated for queries and notifications. If you wish, you may write the issue in your native language and send it to one of the following addresses; your letter or e-mail shall be translated.

It is recommended to our employees to contact and consult to the following senior executives (in order) prior to contacting the Ethics Committee Line (if applicable):

- Related department's manager
- HR manager
- Plant general manager / Top senior executive responsible for the Country.

All notifications made to the ethics hotline, will be replied in 24 hours.

### **OUR CONTACT DETAILS OF THE ETHICS COMMITTEE:**

Tel No : For Turkey 444 70 82

Extention:7082 (Direct Dialling In)

For International Calls +90 212 444 70 82

(24 Hour Access – Call Toll Free)

E-mail : [ethics@standardprofil.com](mailto:ethics@standardprofil.com)

Address : Standard Profil Otomotiv San. ve Tic. A.Ş.

To the attention of the Ethics Committee

Merkez Mah. Baglar Sok. No: 14/3

Tekfen Ofispark C1&C2 Blok Kagithane 34406

Istanbul / Turkey

## Annex 1 – Rules regarding Prohibition of Working outside the Company

Standard Profil employees may not accept any public or private, permanent or temporary, paid/unpaid duty outside the company when working in a second job creates conflict of interest or the third party is in a competition with SP.

To ensure that working in a second job does not cause any ethical misconducts, it is obligatory to the employees to inform the Human Resources Department with written notification to prevent any potential damages.

Additionally, if the second job is of different nature or industry in which employee is running in SP, the employee is permitted to work, provided that the following conditions are satisfied concurrently:

- It shall be evaluated and approved in writing by the management if working in the second job would create a conflict of interest
- Opinion of the supervisor of the employee and the Human Resources to the effect that there is no decrease in the performance in the current situation,
- The person is not engaging in any activity with respect to the second job during working hours.

Employees may take offices in educational institutions for the purpose of sharing their professional experiences provided that the above-listed conditions are satisfied.

Employees may take offices as volunteers in philanthropic and non-profit organizations so long as it does not hinder their duties within Standard Profil Group.

## Annex 2 – Rules regarding Accepting – Giving Gifts and Hospitality

### ACCEPTING GIFTS

- Gifts may in no way be of cash nature (gift cheque, gold, treasury bonds, and share certificates).
- The annual total amount of gifts received per person from the same entity or 3<sup>rd</sup> parties may not exceed EUR 50. However, if the limits for giving/receiving gifts determined in the local legislation of the country of operation are lower than such amount, such limits shall be applicable.
- Receiving gifts or benefits which are clearly meant for achieving a favor is prohibited.
- Receiving bribes and/or commissions may not be accepted under any condition.
- Group employees may accept gifts which are given for reasons such as sale campaigns and promotional activities and which do not exceed EUR 50 in value. It is essential that gifts are sent to the business addresses.
- All gifts are notified by the recipient of the gift to and recorded by the human resources department.
- All gifts that are not eligible with these policies should be returned to the sender.
- Standard Profil Employees may participate in meals/training/lunch and meetings which may not be regarded as gifts and which may be acceptable in the business world and are at reasonable standards, upon approval of their department managers.
- Standard Profil employees may participate in events sponsored by sub-employers, suppliers, consultants, banks, competitors or customers and affiliated entities of such persons, and have their travel costs, event expenses and similar payments met by the same only following the approval of the Assistant General Manager of the relevant function, provided that it is ensured that there are no conditions which may affect their impartiality and decisions. For all employees and executives at all levels, status of participation in all such events are shared with and recorded by the Human Resources department.
- In exceptional circumstances where local cultural values in our operations require mutual exchange of gifts above the limits determined by the company policy; gifts may only be accepted on behalf of the Group and upon approval of the Group's upper management. In any case, exchange of gifts must be done in accordance with the local culture.
- Company Human Resources departments report to the Group HR Assistant General Manager and the Ethics Committee once a year regarding all gift records.
- All gift records are audited within the scope of annual audit studies.

### GIVING GIFTS

- Standard Profil employees act in compliance with the rules of accepting gifts in all practices within the scope of giving gifts;
- Standard Profil employees are prohibited from giving money on loan or otherwise to sub-employers, suppliers, consultants, competitors or customers.
- Standard Profil employees may bear the travel costs, event expenses of sub-employers, suppliers, consultants, banks, competitors or customers and affiliated entities of such persons and similar payments only upon approval of the Assistant General Manager of the relevant function. All such expenses are shared with and recorded by the Human Resources department.
- Gifts may not in any way be of a cash nature (gift cheque, gold, Treasury bond, share certificate).
- Value of gifts may not exceed EUR 50 per person. Exceptions can be approved by upper management and must be recorded. (The maximum values of the gifts may not exceed the thresholds determined by the related Country's Regulations)
- Giving or offering gifts or benefits which are clearly meant for a favor is prohibited.



- Giving/offering bribe and/or commissions is not accepted under any condition.
- Standard Profil employees may give gifts which are given for reasons such as sale campaigns, promotional activities and which do not exceed EUR 50 in value. Exceptions can be approved by upper management and must be recorded.