

ETHICS_{SP}



STANDARD PROFIL GROUP CODE OF ETHICS



STANDARD PROFIL





Standard Profil Group Code of Ethics

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Dr. Klaus Elmer / CEO

WE CONTRIBUTE TO THE DEVELOPMENT OF THE SOCIETY IN WHICH WE LIVE WITH OUR ETHIC CODES

Dear Colleagues,

As the Standard Profil Group, we produce tailor-made solutions in automotive sealing-systems for our customers, while incorporating our vision of sustainable growth and results. In this direction, we harmonize our processes and methods of conducting business according to our values;

- Honesty
- Transparency
- Integrity

- Continuous improvement
- Quality
- Safety
- Sustainability

The Standard Profil Code of Ethics has been established in 2014, which

- is one of our most important guide for the sustainable growth of our group,
- reflects our commitment and dedication to core 'business conduct principles' and 'business ethics',
- is a useful and enlightening resource for all stakeholders,
- is providing a guideline for understanding and comprehending the way we conduct ethical business.

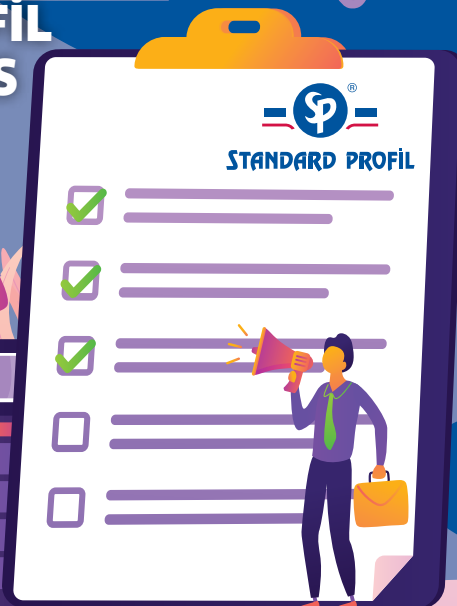
As employees of the Standard Profil Group, we continue to adopt these principles, rules, and practices, and by complying with their content, we contribute to the development of the society in which we live.

I would like to remind you that it is in our hands to ensure that our Code of Ethics is successfully implemented, sustained and enriched. Thank you for your support on this journey.



Code of ethics manifest of Standard Profil Otomotiv Sanayi ve Ticaret A.Ş. and its subsidiaries has been prepared as a summary of code of ethics. Full text of Standard Profil Otomotiv Sanayi ve Ticaret A.Ş. ("Standard Profil", "Şirket", or "SP") code of ethics is published in the website www.standardprofil.com in Turkish, English and Spanish. Implementation guideline of code of ethics may be found in Chapter "4" of this document.

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.

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.

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.***

OUR VALUES AND ETHICS PRINCIPLES



2.1

HONESTY, RIGHTEOUSNESS AND TRANSPARENCY

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.

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. 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 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.



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.



2.6

QUALITY AND CONSTANT DEVELOPMENT

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.



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.

2.8

COMPETITION

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.



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.

RELATIONSHIPS WITH STAKEHOLDERS



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

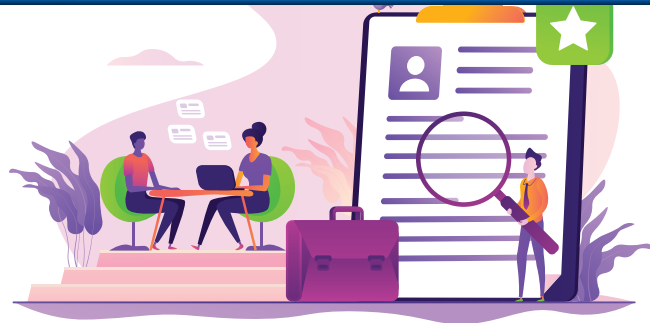
RELATIONSHIPS OF STANDARD PROFIL GROUP EMPLOYEES WITH THEIR OWN COMPANIES

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.



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.

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

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.



3.5

RELATIONSHIPS WITH SUPPLIERS

- 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.
- 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.
- 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.



3.6

RELATIONSHIPS WITH SOCIETY

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 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



- 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.
- 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.
- 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.

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 & Corporate Communication



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 3rd 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.

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

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



STANDARD PROFIL

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WE AIMED TO PROVIDE YOU
THIS SOURCE BOOKLET IN
ORDER TO GIVE YOU HELPFUL
INFORMATION REGARDING HOW TO
BEHAVE AND ACT IN CASE OF AN
ISSUE RELATED TO ETHIC RULES
YOU MAY ENCOUNTER WITH.
THIS BOOKLET WILL GUIDE US
AND LIGHT OUR WAYS TOWARDS
THE BUSINESS PROCESSES
WITH OUR BUSINESS PARTNERS
AND OUR EMPLOYEES.



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