



**We Apply Our Values Every Day**



***Kimpur - Code of Business Conduct***

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*Codes of Business Conduct*

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## Honesty

Kimpur is passionate about chemistry, which forms the basic building blocks of the industry. We believe that the chemistry will change the future of humanity for the better. The biggest promise of our industry is to offer solutions that will make the world and our country a better place by directly providing employment with our products and indirectly through our operations, accelerating the economy and raising the standard of living.

We are clearly focused on achieving these objectives. Our values of honesty, respect for people and protecting our planet are those that exist in our corporate culture and bring us together.

We are in an age where global consciousness and common values become prominent in science, art and trade, developing with open communication and global competition. Our purpose is to reinforce the corporate governance approach and practices that support our products and services we provide with the principles of fairness, transparency, accountability, responsibility and sustainability. In this context, our group has significant responsibilities accordingly.

Since the concepts of transparency, auditability, honesty and reliability have become prominent, the duty of ensuring that the company's activities comply with the legal regulations, and social and ethical values has been subject to significant sanctions. The compliance with the Code of Ethics is significant for the sustainability of companies' activities and the most important guide for employees.

Standing for Code of Business Conduct, Kimpur Ethics takes these values into a versatile and clear framework by setting expectations and guiding our behavior. We aim to enable ethical and legal decision processes and to create a respectful environment. We also believe that it is our duty to carry these values beyond the borders of our company. We believe that achieving these values will lead us to success.

Kimpur not only embraces market opportunities with innovative chemistry applications, but also acts as more than a solution provider. Having achieved great success in a short time, Kimpur is an intellectual leader and a source of economic growth, whose integrity is not questioned. Initially, we wanted to fully understand our values, act accordingly, and ensure that personality and company dignity are at the highest level and represented in every individual. Our long-term sustainability depends on this. Our Board of Management, customers and communities expect nothing less.

Thank you for reading, adopting and applying **kimpurethic** which means our Code of Business Conduct, both in your business and private life.



Cavidan Karaca  
CEO  
Kimpur

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*Cavidan Karaca*



# Implementing Our Values

We are committed to the highest ethical standards for over 34 years, and therefore have earned the trust of our employees, customers, shareholders and society.

Our company has changed many times during its long history. However, the common ground between Kimpur employees and generations has always been Integrity, Respect for People and Protecting Our Planet. These values form the basis of our every action: These values guide us to do business fairly and be aware of our responsibilities to each other and to society.

Although the global economy expands and the business environment becomes more complex, the Code of Business Conduct provides a framework for making good choices to: comply with the law in all our business practices and have high principles and social responsibility.

The Code applies to all Kimpur employees and affiliates, as well as to our joint ventures that have adopted it. In this document, the references to Kimpur or the Company apply to all of these legal entities.

## Everyone's Responsibility

During normal business processes, we will have to face with conditions where the right answer may not be obvious. The Code can guide us, but it may not cover every condition. In all cases, our responsibility is to avoid even the impression of inappropriate behaviors. We are required to comply with current laws, practice our values, and always seek guidance when in doubt.

## Responsibilities of Managers and Leaders

Actions are louder than words; this is why we put our leaders through higher standards. Managers are expected to provide guidance on appropriate behavior, ensure that employees have the resources they need to conduct business ethically, support mutual communication, and respond to all concerns.

## Make yourself heard

We measure our commitment to our values by how we treat each other. Employees have an obligation to act in a way that protects our business interests, our reputation and each other. When the details are not entirely clear, they are obliged to report any behavior that violates our rules or values. All reports of inappropriate behavior are taken seriously and handled confidentially in accordance with a full and fair inquiry.

Questions and concerns about behaviors can be directed to:

- Manager
- Human Resources Department
- Ethics Committee

## Without Retaliation

We respect anyone who raises concerns about improper conduct and will not tolerate retaliation against anyone who, in good faith, reports a potential violation.

## Our Values

The Kimpur Values form the basis of the Code. Each one of them is part of Kimpur's standard of ethical practices and should influence our every action.

### ✓ Honesty

We believe that our promise is our most important element. The relationships that play a critical role in our success depend entirely on maintaining the highest standard worldwide.

### ✓ Respect for Human

We believe that all people are inherently valuable. Our employees are the driver of value creation. Our imagination, determination and commitment are essential for development.

### ✓ Protecting Our Planet

We believe that the earth's resources should be protected. Our sustainability projects include the world's best problem solvers working on the world's biggest challenges. Our decisions, innovations and objectives we have achieved are all powered by our principle of "Setting the Sustainability Standard" and making the world a safer, cleaner and greener place for the next generations.

Keywords: Ethics



## Codes, Laws and Company Policies

Kimpur has detailed policies in many areas covered by the Code and has implemented a wide range of industry and non-sector experiences. Being a law-abiding company, we have to comply with the laws of many countries to which we export, particularly Turkey. In case that the Code conflicts with existing local laws, the law takes precedence.

If you have any questions about local laws, codes or other company policies, please contact the Kimpur Ethics Committee.

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We measure our success not only by our results we achieve, but also by the way we achieve those results. Every decision we make and every action we take must be based on the highest level of business and professional integrity. This results in a safe and reliable work environment, team unity, and ultimately, a company culture that offers opportunities for success to each of us.

## Diversity, Equal Opportunity and Respect

**When you respect diversity in our workplace, you can provide an inclusive environment where everyone can perform at their highest potential.**

- We provide equal employment opportunities to all employees and candidates, regardless of age, race, color, nationality, gender, gender identity, disability, religion or other elements protected by law.
- Promotions, compensations, and other employment-related decisions are only based on work-related factors.
- We work to create an environment of mutual respect, free from harassment and unprofessional behavior. Our Respect and Responsibility Policy demonstrates our commitment to preventing all inappropriate behaviors.
  - Sexual harassment is a particularly harmful form of inappropriate behavior. It may include unwelcome flirting or sexual acts, making sexual demands, unwanted physical encounter, and offensive verbal, visual or physical behavior of a sexual nature. It may also contain inappropriate images, posters, screensavers, videos, or e-mail messages.
  - Intimidation and humiliation are unacceptable. These include aggressive, intimidating or offensive behavior that creates a threatening work environment.
- We refrain from engaging in humiliating, hurtful, humiliating or intimidating behavior or making such remarks towards others. Acts that seem innocent can create a hurtful environment. Therefore, we should be conscious of our own behavior and its possible effects on others.



Disrespectful or threatening behaviors humiliate people and causes confusion that can harm productivity and performance.







*In our every business region, we recognize the fundamental principles of human rights and comply with labor and employment laws.*

### **Employee Policy**

**Respect for human rights and dignity is one of the cornerstones of our business.**

- Wherever we do business, we comply and respect all labor and employment laws, including those related to privacy and equal employment opportunity.
- We believe that working positively and directly with employees is in the best interests of the employees.
- We strive to work with fairly elected employee representatives to jointly pursue the interests of employees and the Company's mission.
- We do not make use of forced or involuntary labor.
- We comply with all applicable child labor laws.

*Unsafe or potentially dangerous situations should be reported immediately to a manager, responsible care leader or OHS leader.*

Keywords:OHS

### **Occupational Health & Safety**

**We provide a safe and healthy work environment and remain committed to avoiding occupational injuries and illnesses.**

- Employees and the company share the responsibility to prioritize a safety and health daily work.
- By using the resources at our disposal and following recommended practices, we support each other in our activities to live in a safe and healthy environment.
- When we are informed of an unsafe or dangerous situation, we are responsible for taking corrective actions.

*We all have a responsibility to work without the influence of alcohol or other substances that could affect our judgment or safety at work.*

Keywords:OHS

### **Drug Abuse**

**We are deeply committed to protecting the safety, health and safety of our employees, our businesses and all those associated with them. We do not tolerate any sort of drug abuse in the workplace.**

We expect employees to work without any drug effect that could affect their judgment or safety at work.

- We do not allow the use, possession or sale of drugs, controlled substances or drug-related equipment in any Kimpur facilities.
- We do not allow the consumption or possession of alcohol, except for certain pre-authorized on-site social events.

Kimpur reserves the right to conduct drug and alcohol testing as permitted by local law.

### **Occupational Violence**

**Kimpur does not tolerate acts of violence, including verbal or physical threats, intimidation, harassment and coercion.**

- Weapons, firearms, ammunition, explosives and arson devices are prohibited in the company's property.
- Please immediately report any behavior that shows the potential for violence or threatens the safety of persons or property to a manager or security guard.
- For more detailed information on the rules in your location, please obtain the sources for writing OHS procedures from the relevant departments.

Kimpur reserves the right to search any item on company property at any time as permitted by local law, including offices, desks, computers, wallets, bags, automobiles, packages and lockers.

Kimpur is respected as a science innovator, a preferred supplier and a tough competitor. Thanks to financial integrity and strong management, we have successfully demonstrated our credibility as a top investment in the market.

### Conflicts of Interest

**We should avoid situations where personal interests conflict or appear to conflict with the interests of Company. This includes any action that could cause others to doubt our fair practices or affect the way we do our job objectively.**

If a situation is likely to be perceived as a conflict of interest, we should report it to a manager, the HR Department or the Kimpur Ethics Committee and take appropriate steps to resolve it.

Common conflicts of interest include:

- Having a financial interest in a company doing business with Kimpur.
- Receiving a compensation or other incentives from a company doing business with Kimpur.
- Having a second job other than Kimpur.
- Starting to work with a supplier, distributor or other agents who are managed or owned by a relative or close friend.
- Engaging in an emotional affair with someone who reports to you or you report to.

Conflicts of interest can be observed in many forms. The Code may not cover all possible situations of conflict of interest, so we need to use common sense and seek guidance when in doubt.







### ✓ **Non-Business Interests**

**Employees must avoid investments or other financial interests that could affect or appear to affect our ability to make decisions that are in the best interest of our Company.**

#### Don'ts

- If we are in a position to influence the business relationship with any of Kimpur's customers, suppliers, distributors or agents, having any financial interest in those natural or legal entities.
- Taking advantage of Kimpur's business or profit opportunity or competing with the Company in any way.

The Annual Conflict of Interest Survey asks all of us to disclose any personal circumstances that may create a conflict of interest. It is of great importance that we answer the questionnaire completely and honestly and, in case of a situation, immediately notify our manager or the Ethics Committee.

### ✓ **Working in Another Company**

**Kimpur does not lend countenance to work in any business outside of Kimpur, to own shares of any company, or to establish a business in the same sectors on behalf of a relative, since this may affect our ability to do our business in Kimpur and cause conflicts of interest.**

#### Don'ts

- It is against the company rules to serve or be a shareholder in any for-profit company other than Kimpur. If the business in question is a nonprofit or charitable organization, the approval is not required.
- If we are in a position to influence the business relationship with any of Kimpur's customers, suppliers, distributors or agents, working in those real or legal entities or receiving any compensation from them.
- Working for or receiving any compensation from any of Kimpur's competitors.

### ✓ **Conference Talks**

**The Company does not accept any responsibility or fee in case that any employee is invited to speak at a conference since he/she is a Kimpur's employee or because of his/her expertise stemming from our business responsibilities. However, in such a case, the Company may accept payment for reasonable expenses.**

### ✓ **Relatives, Friends, and Personal Relationships**

**Many of us have relatives or friends who have a business relationship with Kimpur, our customers, suppliers, distributors, agents or competitors. These situations may raise questions of conflict of interest, as others may feel that we hold these relationships above the Company's interests.**

We must notify our manager or the Kimpur Ethics Committee of all circumstances where one of the following applies:

- Having a relative or close friend who has a financial interest in or works for one of these natural or legal entities if we are in a position to influence Kimpur's business relationship with any of its customers, suppliers, distributors or agents.
- Having a close family member working for one of Kimpur's competitors.
- Being in a position to hire, manage, or otherwise having authority over a relative or person with whom we have an emotional relationship, directly or indirectly.



*Personal relationships and non-business interests and activities should not affect our business performance at Kimpur or our commitment to Kimpur.*



*Focus on Quality and Clarity*

### ✓ Gifts and Entertainment

**Gifts and entertainment events are often utilized to strengthen our business relationships. However, we should not accept or offer them in case that they could influence or appear to influence the decision making process.**

Before offering gifts or entertainment to customers or others outside the Company, we must understand the recipient's rules about accepting gifts and entertainment.

We do not offer gifts or entertainment event that may cause embarrassment to the company, be perceived as bribes or kickbacks, or represent preferential treatment in conducting any business.

#### Guiding Information for Gifts:

- We never offer or accept gifts of any cash or cash equivalent such as gift certificates.
- We do not offer or accept a gift that is worth more than what is reasonable based on local customs and standards.
- We may accept gifts or discounts offered to a large group of employees as part of a contract between the company and a customer, supplier, distributor or agent.

#### Guiding Information for Entertainment Events:

- We do not offer or accept entertainment or recreational activities unless they comply with customary business practice. For example, occasional business lunches with a customer or supplier, or going to the movies or sporting events are generally acceptable.
- We do not offer or accept entertainment events that are sexually explicit or otherwise indecent or does not comply with our "Respect for People" Values.

**Keywords:**  
**Regulations on Cost**



*Gifts or entertainment events should never affect or appear to affect our ability to make objective business decisions that are in Kimpur's best interests.*



*Not just the financial personnel, but all of us are responsible for the integrity of our business and financial records. Accurate records build our reputation and enable us to meet legal requirements.*

**Keywords:** Ethics Committee

## **Business and Financial Records**

**Business records and financial records are essential to the Company's success. The integrity and accuracy of these records helps internal decision-making and underpins our practice of reporting to shareholders, investors, lenders, government agencies and other stakeholders.**

Things to do:

- To store and present all Company records and reports in accordance with the law. These records include, in addition to accounting records, all other electronic or written records, expense reports, time sheets, medical claim forms, personnel evaluations, and a wide range of analytical, engineering and technical reports.
- To establish and execute a strong and effective internal audit system.
- To ensure that all Company records accurately and fairly reflect the underlying transaction.
- Not to falsify any documents.
- To record all financial transactions in the correct account, department and accounting period.
- To ensure that all actions and commitments comply with Kimpur's Authorization Policy.
- To verify that all public communications, including reports to government officials, are complete, fair, accurate, timely and understandable.
- To raise concerns about the accuracy of Kimpur records to finance management or another appropriate channel, such as the Kimpur Ethics Line.

## **Utilization and Protection of Company Resources and Information**

**We all are obliged to protect and properly use the Kimpur's resources.**

Kimpur resources are intended for business use. In certain circumstances, the use of limited personal may be acceptable as long as we follow the Kimpur's policies and do not incur additional costs or be offensive to colleagues.

As employees, we are expected to:

- Use company resources legally and responsibly.
- Protect the Kimpur's resources against theft, waste and carelessness.
- Not to use company funds or other resources to support other business or unauthorized actions.

Examples of company resources include:

- Company funds, credit cards and other accounts
- Computers, electronic networks and other office equipment
- Telephone and mobile communication devices
- Internet access and e-mail
- Materials
- Tickets for sports and entertainment events
- Company's proprietary information



### ✓ Intellectual Property

**Our abiding success and future growth depend on innovative products and solutions. We must protect our intellectual property against theft, misuse and loss, in order to gain a sustained competitive advantage for Kimpur's business.**

With the support of our legal advisors, we must all take appropriate steps to provide intellectual property protection for Kimpur innovations, proprietary information, trademarks, trade secrets and copyright materials.

These include:

- Using the Kimpur brand and its trademarks, including **kimpurethics**, in accordance with company guidelines.
- Reporting all concerns of infringement, misuse or misuse of Kimpur intellectual property to the Kimpur Ethics Committee.
- Respecting the third parties' trade secrets, copyrights, trademarks, patents and proprietary information by avoiding illegal use or infringement.

### ✓ Information Technology

**We intensely use computer systems and telecommunication networks. We must protect these systems from misuse.**

Things to do:

- To observe the Kimpur Information Security – ISO 27001 Policies and security and data protection requirements.
- To use and protect passwords for computer or network access.
- To store and share sensitive, proprietary or highly confidential information in encrypted files on secure servers provided by the company.
- To protect all electronic devices at all times.
- To maintain information security controls.
- To protect company equipment or systems from pornography, gambling, and illegal or other offensive or improper purposes.



*To the extent permitted by applicable law, Kimpur reserves the right to access, monitor, search, review, collect, transfer, restrict, block or otherwise control any Kimpur information and information stored on Kimpur equipment or those authorized by Kimpur. For further information, see Kimpur's Information Security policies.*



*Avoid discussing proprietary company information, even with other employees, unless there is a legitimate business requirement.*

**Keywords:** Management of Records

### ✓ **Management of Proprietary Information and Records**

**We are responsible for maintaining the integrity of Kimpur information and using them appropriately. Unauthorized disclosure of Kimpur information could harm the company or give others an unfair advantage.**

This means we have to do the following:

- To classify documents based on Kimpur's Information Processing Policy.
- To keep and destroy company records in accordance with Information Security practices.
- To fulfill all record keeping requirements for internal investigations, legal proceedings and government investigations.
- To report any loss of Kimpur information in time.
- To comply with all contractual terms for the protection of information of others and not to disclose proprietary information of others.
- To restrict access to sensitive, proprietary or highly confidential information with those who have been trained in the proper handling of such information.
- Not to discuss Kimpur information where the conversation may be overheard or dangerous.

If it is necessary to share proprietary information outside the company, we should first consult with our company's legal counsel to ensure adequate protection is provided, such as a confidentiality agreement.

Examples of Kimpur's proprietary information include:

- Research and development (R&D) information
- Trade secrets
- Personnel records
- Business plans and offers
- Capacity and product information
- Marketing or sales forecasts and strategies
- Buyer and customer lists
- Pricing lists or strategies

We must obtain appropriate approval for external submissions containing Kimpur information. Even after we leave Kimpur, we are obligated to protect the proprietary information of the Company.

### ✓ **Kimpur as Service Provider**

When Kimpur acts as a service provider, it has an obligation to protect the confidential information of its customers. In this context, the controller acts as determined in the agreements or contracts. They should be shared with authorized Kimpur representatives. Please consult for necessary application and information regarding customer confidential information.

## ✓ Data Privacy

In line with Kimpur's "Respect for People" values, we respect individuals' privacy and protect their personal data.

- We take care of personal data responsibly within the scope of Information Security Policies and Personal Data Protection Law, and handle all kinds of contractual obligations and in accordance with local laws.
- We only use personal data for legitimate business purposes.
- We adopt an open and transparent approach to our purposes for using personal data.
- We protect personal data against unauthorized disclosure.
- We restrict the disclosure of sensitive personal data with those who have professional confidentiality obligations and are trained in the correct handling of such information.

Examples of "personal data" include: Address, age, employment information and education/training information. Examples of "sensitive personal data" include: Credentials, Medical information, Financial account numbers, Social Security numbers, race, religion, sexual orientation, criminal convictions and political affiliations.

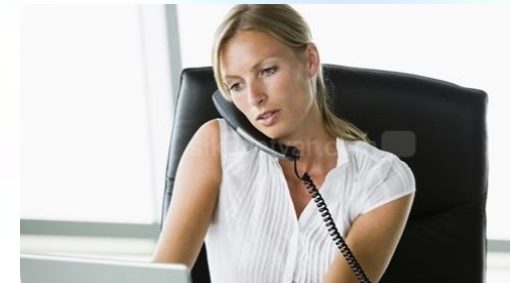
## ✓ Internal Information and Trading

Many of us have access to information that may not be publicly known about Kimpur or the companies with whom Kimpur does business.

This non-public information may relate, among other things, to business or production plans, new products or processes, mergers or acquisitions, serious business risks, sales, negotiations or other financial information.

- We do not trade in the securities of Kimpur or any other company by using material non-public information obtained through our operations. We do not disclose such information to others so that they can trade it. Insider trading is illegal.
- Material non-public information is any information that could influence a reasonable investor's decision to buy, sell, or hold a company's securities.

Insider trading rules are sophisticated. In case of doubt, consult the Kimpur Ethics Committee.



*We may not use material and non-public information about Kimpur, our customers or our suppliers for personal gain.*



## Corruption and Bribery

We are deeply committed to maintaining the highest ethical and legal standards in our relationships around the world. This includes our relationships with governments and government officials, as well as with other businesses. We are not involved in any bribery or corruption practices.

- Interaction with government officials is subject to sophisticated legal rules. The law sets forth severe penalties such as large fines and imprisonment for bribery and corruption. Even simple acts such as giving a gift to a government official can raise suspicions of corruption.

To avoid even the appearance of improper conduct, we must seek approval from the Ethics Committee or Legal Counselors, as directed by the Ethics Committee, before giving any asset of value (including gifts, entertainment, or employment opportunities) to a government official.

- Prior approval is not required if a payment is required to ensure security or safe passage; however, we must inform the Ethics Committee as soon as possible after the payment is made.
- We all pay the same attention to preventing bribery and corruption in transactions with other businesses or private parties.

Who are the government officials?

- Employees of all government-owned or government-controlled organizations around the world, including low-level administration officials
- Political parties and party officials
- Candidates for political office
- Employees of public institutions such as the United Nations
- Employees of state-owned enterprises

If unsure, contact the Kimpur Ethics Committee.

### ✓ Anti-bribery Policy

**A bribe is referred to as giving or offering someone an asset or service of value in order to improperly influence a decision.**

We should not offer, promise or give anything of value to a government official or any other person for the purpose of gaining a business advantage. We should not accept bribes from others.

Examples of bribery include paying a government official in order to:

- Ensure the company to sign a contract.
- Obtain advantageous tax or customs treatment.
- Obtain permits or regulatory approvals.
- Violate or not to enforce any laws or regulations applicable to the Company.

Bribery also includes commission, which means making or receiving a personal payment to influence the outcome of a contract or other business transaction.

We should also avoid situations such as paying a bribe using a third party such as a subcontractor, consultant or agent. The Company and individual employees may be held liable if a third party pays a bribe on our behalf, even if we did not direct the payment. When selecting agents and consultants, we must ensure that they do not show signs of the possibility of paying bribes.

*We do not give anyone a valuable asset to gain any improper business advantage.*

Keywords: Anti-Bribery Policy

## Competition

Our responsibility to do business ethically also concerns our relationships with our customers, shareholders, suppliers, competitors and regulators.

This means competing within legal limits and based on prices, quality and service.

### ✓ Antitrust and Fair Trade

- We earn business ethically and comply with all antitrust and trade laws that require free, fair competition.
- We do not negotiate or come to terms with competitors or other persons who may restrict free competition. This includes discussions with competitors about:
  - Prices or terms of payment.
  - Tender or tender submission.
  - Sharing of customers or division of regions.
  - Production or distribution restrictions.
  - Boycotting suppliers or customers.
- We do not engage in any commercial practices that are unfair, misleading or deceptive.
- We advertise, promote and label our products and services in a truthful, honest and informative manner.

### ✓ Collection of Competitive Information

Information about our competitors helps us better understand market demands and improve our products and services.

However, we must always collect competitive information legally and ethically.

We use publicly available information, including published articles, market analyzes and acquisition reports, to obtain competitive information.

- This means that we will not seek a competitor's confidential information or accept any other person's confidential information without their consent.
- We never use illegal or unethical means (e.g. theft, bribery, misrepresentation or espionage) to obtain competitive information.
- We comply with all applicable laws when collecting competitive information.

## Antitrust and Competition Laws

*are serious business elements.*

*Antitrust crimes do not have to contain any written evidence. Even the impression that an agreement has been reached with a competitor can have serious consequences. Violation of antitrust laws exposes the Company and individual employees to penalties and lawsuits in major civil and criminal law.*

*If an issue with antitrust compliance arises, we should immediately speak to our manager, the Ethics Committee, or a Legal Counsel referred by the Ethics Committee.*



*Always respect the confidential information of others and never use other illegal or unethical means to misrepresent or obtain competitive information.*

**Keywords:** Competition



## Commercial Audits

**We do business internationally in a world that can be dangerous. To curb terrorism, weapons production, and combat narcotic trafficking and other crimes, some states have implemented trade controls that restrict certain businesses and the movement of certain goods across national borders.**

- We must comply with all trade controls that apply to our business.
- Trade control laws may restrict:
  - Export of certain goods, services and technologies.
  - Business transactions (including imports, exports and investments) with specific countries, natural and legal entities.
  - Travel to specific countries.
  - Information exchange.
- We must also comply with trade restrictions, economic sanctions and anti-boycott laws around the world, and with local trade controls wherever we do business.

**The related laws are complex and subject to change frequently.** Penalties for violation of trade control laws can be severe. You should do the necessary research and be fully informed before taking any action that may involve a sanctioned country, a prohibited party, or products subject to export controls.



Keywords: Ethics  
Committee



We conduct our business with the awareness that we live together on a planet with limited resources. Accelerating the development of efficient and renewable solutions is not just a strategic imperative, but also a core part of our values. Therefore, every actions we take and the way we take them matters a lot.

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### ✓ Setting the Sustainability Standards

We are all part of a complex system that requires balance, innovation and an uncompromising focus on protecting our planet. Our commitment to each other and to environmental awareness requires that we:

- Comply at all times with environmental laws and Kimpur policies applicable to our business.
- Ensure that our products, work and behavior always comply with applicable government standards, Kimpur's environmental standards and approved compliance plans.

Laws are sophisticated, subject to frequent changes and differ between countries. If you have any questions or concerns, you should consult a legal counsel or an OHS expert, as directed by the Ethics Committee, to clarify how these principles apply to your business.

### ✓ Corporate Citizenship

**We are committed to enabling positive change through community partnerships, charitable activities and volunteering.**

Through our science activities, expertise, volunteer work and donations, we take bold steps to help solve some of the world's most difficult problems. Through our relationships with our neighbors and partners, we must build better, stronger and more sustainable societies where we do business. Our sustainability goals and corporate citizenship initiatives should be a source of honor for our employees.

- Active discussions with organizations that represent our communities are helpful.
- We must support initiatives that respond to the goals and needs of society and seek ways to increase our capacity to support them.



*We strive to reduce waste and emissions and support resource saving at every life cycle of our products.*

**Keywords:**Sustainability, Citizenship

### ✓ Charitable Activities and Volunteering

Kimpur and its affiliates participate in various charitable activities across Turkey. This participation ranges from financial contributions to donations involving Kimpur products, services and other resources.

Things to do:

- To support our personal community activities with our own resources and without being a representative of Kimpur.
- To obtain permission for any donation to be made to any charitable organization on behalf of Kimpur.

Don'ts

- To represent Kimpur in a public process or platform, unless specifically requested to do so by the senior management.
- To receive advance payment from Kimpur for personal expenses or donations to charitable activities.

### ✓ Political Activities and Contributions

Kimpur encourages its employees to participate in local, national and international political processes, but reminds them that there are some regulations regarding these.

- In case you express your own personal views on a public platform (for example, a letter published in a newspaper), we should not use the Company letterhead or Company e-mail or indicate our business address or title.
- We always comply with all applicable laws governing Kimpur's participation in political activities, including political contributions.

### ✓ Public Communication

We strive to communicate with the public in a honest and consistent manner. To ensure that we comply with the law and protect our interests, only those specifically appointed should represent the Company publicly or in the media.

- If we receive a query from an external person regarding a Company matter, we should direct it to our manager and/or the Kimpur Ethics Committee.

### ✓ Social Media

Social networks and other types of social media are becoming part of business trends. In general, the rules applicable to new communication tools are consistent with traditional communication rules. Specifically,

Things to do:

- To clearly distinguish between authoritative business communication and personal communication. If you express a personal opinion on public matters, you should not create the impression that you represent or express the views of Kimpur.
- You should respect trademark, copyright, fair use, trade secret and financial disclosure laws and Company guidelines.
- You should adhere to Kimpur's Values in all authorized business communications.

Don'ts

- You should not speak on behalf of Kimpur if you are not an appointed spokesperson or have not received a permission to do so.
- You should not disclose confidential information of Kimpur, its employees, customers or other business partners.
- You should not mention these assets without the consent of Kimpur customers, suppliers or business partners.
- You should not endorse the company's products or services without prior approval.
- You should not disclose personal data about others, especially personal data obtained as part of your company relationships.



*Kimpur has business rules governing political participation where permitted by law. Consult if you are considering political involvement on behalf of the company or in connection with the company's business conduct.*

**Keywords:**Participations

*We are free to present our personal views in community activities; but we must be clear that we are participating on our own behalf.*

**Keywords:**Social Media Principles

## Management of Code

We are committed to maintaining an environment where compliance with the law and the Code of Conduct is requested. This requirements begins with each employee and extends to our customers, suppliers, business partners, shareholders and regulators.

The Ethics Committee is responsible for the management of the code under the supervision of the Executive Board. It consists of Departmental Leaders, as well as senior finance, Human Resources and Internal Audit personnel, and other senior employees.

### ✓ Inquiry and Response

The Company considers all potential violations of the law or codes and fully investigates them. It is responsible for investigations in its geographical regions, under the supervision of the Ethics Committee. Relevant experts conduct investigations. Investigations are conducted in a respectful, confidential and fair manner. In the event that the investigator proves an accusation, a management team reviews the findings and determines the final outcome.

The company protects anyone who honestly raises a concern. However, knowingly making false accusations, lying to the investigator, or interfering with the conduct of an investigation or refusing to cooperate in an investigation is a violation of the Code. We are all expected to tell the truth and cooperate fully in all investigations.

### ✓ Acceptance Notice

Periodically, we are required to inform that we have read the Code and agree to abide by it. Failure to read or accept the Code is not considered as an excuse for our non-compliance with the Code.

### ✓ Disclaimer

A waiver of any provision of the Code must be approved by the Executive Board or the Ethics Committee.



### Penalties for Violations of the Code

*We strive to be consistent and fair in penalties for violations of the Code. Penalties may include a verbal or written warning, or termination of employment for the most serious offenses or repeated misconduct.*

*We may not tolerate vengeance or retaliation against anyone who reports a potential violation in good faith. **Retaliation**, may result in the termination of employment.*



# Resources

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## Contact Persons

Questions and concerns about behaviors can be directed to:

- Department Managers
- Human Resources Department and Representative
- Ethics Committee
- Ethics Committee Member
- Statement Form (Ethics)

## Statement Form (Ethics)

Reports entered on the Kimpur Ethics Form to raise a violation or concern will be reviewed by a qualified professional.

No personal information about those who make the notification is requested.

You can log in by typing "kimpur83" in the Security Code section in the form with the following link.

You may access the Codes Of Conduct via <http://kimtranetpu/>.

**To contact using the Ethics Statement Form:**

[www.kimpur.com/etik-kural](http://www.kimpur.com/etik-kural)

You can submit your messages to the address above.



# kimpuretik

*Passion, Transparency and Commitment*





## **Kimpur - Code of Business Conduct**

As adopted by the Executive Board on October 20, 2017