
Kazan Soda Elektrik Uretim A.S. Supplier Code of Conduct

Purpose

This policy has been established to clarify the expectations and obligations of suppliers, business partners and subcontractors (each a “Supplier” and collectively, the “Suppliers”) of Kazan Soda Elektrik Uretim A.S. (“Kazan Soda”).

Kazan Soda values its partnerships with Suppliers and fully recognizes that our mutual success is built on open communication and a commitment to common principles and business practices. Accordingly, Kazan Soda has set high standards for the way it conducts business in the areas of regulatory compliance, social responsibility, and environmental stewardship. It is the responsibility of each Supplier to ensure that its employees, agents and representatives understand and comply with this Supplier Code of Conduct (“Code”).

Kazan Soda’s own code of conduct (available on request) outlines the standard of conduct from individuals working at Kazan Soda.

Ethics and Legal Requirements

Suppliers will conduct their business in a legal and ethical manner and act with integrity. Further, they will ensure that all third parties and subcontractors are in full compliance with contractual agreements and compliance requirements. Including:

- *Compliance with Applicable Laws and Regulations*
Meet and document compliance of all applicable regulatory and statutory requirements.
- *Avoid Conflicts of Interest*
Take steps to disclose, manage and document any actual, potential, or perceived conflicts of interests in relation to the Supplier’s engagement with Kazan Soda;
Avoid any conflict of interest when interacting with Kazan Soda employees; and
Notify Kazan Soda of any inappropriate gifts or hospitality offered to Supplier employees which might influence or appear to influence any Supplier employee decision in relation to WE Soda.
- *No Bribery*
Refrain from engaging in any form of commercial bribery with its suppliers, agents or customers, nor offer any incentive to any Kazan Soda employee or family member of a Kazan Soda employee in order to obtain or retain business; and
Abstain from any form of governmental bribery or facilitation payment with any political, regulatory or other government employee and comply with all applicable laws dealing with the bribery of government officials, including, as applicable, the U.S. Foreign Corrupt Practices Act; the Organisation for Economic Co-Operation and Development’s Anti-Bribery Convention, the UK Bribery Act and Turkish anticorruption laws.

- *Anti-Money Laundering*

Refrain from engaging in any activity, practice or conduct which could be construed as a violation of all applicable law relating to the prevention of money laundering and terrorist financing including, without limitation, the Law No: 5549 on Prevention of Laundering Proceeds of Crime.

- *Fair Competition*

Comply with all applicable laws regarding fair competition and antitrust; and

When preparing proposals, bids or undertaking contract negotiations for Kazan Soda and our clients, Suppliers must be certain that all statements, communications and representations are accurate and truthful.

- *Protect Information*

Safeguard Kazan Soda's confidential information and act to prevent its misuse, theft and improper disclosure;

Process and store information as agreed with Kazan Soda and in accordance with the Law No: 6698 on the Protection of Personal Data and other applicable legislation;

Have appropriate privacy / data protection and information security policies and procedures in place to protect personal and confidential information; and

Notify Kazan Soda immediately of any actual or suspected privacy breaches, security breaches, or losses of our information and assist Kazan Soda in managing any consequences arising from such events.

- *Financial Integrity*

Not engage in any activity that is designed, or can be reasonably construed, to perpetuate a fraud; and

Comply fully with all their obligations in relation to all taxes due within the jurisdictions in which they operate. Suppliers must not participate in tax evasion or facilitate tax evasion by others. Specifically, we expect our Suppliers to have contracts, policies, systems, and /or procedures in place to ensure that all who act for them or on their behalf, also comply with such obligations.

- *Identification of Concerns*

Provide means for Supplier employees and agents to report concerns or potentially unlawful activities in the workplace. Treat any report in a confidential manner. Investigate such reports and take corrective action if appropriate.

Human Dignity and Labour

Suppliers must abide by applicable employment standards, labour, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or where they allow for differential treatment, Suppliers are expected to be committed to non-discrimination principles and not to operate in a way that unfairly differentiates between individuals.

All labour must be voluntary. Suppliers shall not support or engage in slavery or human trafficking in any part of its supply chain. Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect. Including:

- *Modern Slavery and Human Trafficking*

Comply with applicable laws and regulations of the countries in which they operate with respect to slavery, servitude, prostitution, forced and compulsory labour and human trafficking, including, without limitation, the Turkish Criminal Law No. 5237 and International Labor Organization;

Incorporate modern slavery clauses in all agreements in its supply chain related to the provision of services and products to Kazan Soda;

Cooperate with Kazan Soda as it carries out periodic due diligence on the Supplier to ensure that the necessary measures are taken to prevent issues relating to modern slavery and human trafficking in the Supplier and its supply chain.

- *Child or Forced Labour*

Comply with the applicable child labour laws of the countries in which they operate and have zero tolerance of child labour that is not in accord with local laws;

Ensure the prevention, detection and reporting of compelled, forced, involuntary, bonded, indentured or prison labour of any type and the trafficking or involuntary servitude of any worker; and

Demonstrate zero tolerance of compelled, forced, involuntary, bonded, indentured or prison labour of any type and the trafficking or involuntary servitude of any worker.

- *Non-discrimination*

Non-discrimination in hiring practices on grounds of race, creed, gender, religion, national origin, age, disability or sexual orientation or other factors as mandated by the Turkish Constitution (as amended) and the Turkish Criminal Law; and

Prohibition of retaliation for speaking up and employees are free to raise concerns and speak up without fear of reprisal.

- *Fair Treatment*

Respect for workers, and a zero tolerance for any engagement in corporal punishment, violence or threats of violence, or other forms of physical coercion or harassment (including, without limitation, sexual harassment).

- *Working Hours, Wages and Benefits*

Working hours for Suppliers' employees will not exceed the maximum set by applicable law and workers;

Workers are entitled to appropriate breaks for rest as required by the Turkish Constitution;

Compensation paid to employees will comply with applicable wage laws. Employees must be paid in a timely manner in accordance with such laws; and

Commit to providing minors, women and persons with physical or mental disabilities with special protection concerning working conditions.

- *Freedom to Work and to Terminate Employment*

Ensure that every employee has the freedom to work and to negotiate and conclude contracts in the field of their choice;

Not deprive any person of their liberties; and

Without limiting Supplier's obligations hereunder, Supplier shall allow workers to terminate their employment or work arrangement: without restriction; and without the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation.

- *Freedom of Association*

In accordance with applicable laws, respect the rights of employees to, whether formally or informally, associate freely, join trade unions, seek representation, and engage in collective bargaining and not interfere with or discriminate against workers choosing to belong to them.

- *Compliance and Documentation*

Implement and maintain a reliable system to verify the eligibility of all workers, including: age; eligibility; regulated/unregulated status and legal status of foreign workers; and

Implement and maintain a reliable recordkeeping system regarding the eligibility of all workers.

Environment, Health and Safety

Kazan Soda's commitment to sustainability includes efficient use of resources, respect for the environment, and safe and healthy workplaces. Kazan Soda expects its Suppliers to make similar commitments to continuously improve their environmental, health and safety performance. Including:

- *Respect the Environment*

Collaborate to eliminate waste and cost from the supply chain, such as programs to reduce emissions and waste, promote the efficient use of energy and natural resources, and encourage responsible management of their products and processes through their entire life cycle, and for their intended end use; and

Document any actions that have been taken to minimise the environment impact of the Supplier's products and services.

- *Protect Health and Safety*

Demonstrate and actively work to advance sustainable business practices and a clear commitment to a safe workplace by complying with Kazan Soda's site rules and guidelines, the Supplier safety check list, the Occupational Safety and Health Law and any additional Health and Safety legislation applicable to the Supplier's industry;

Health, safety and security must be priorities in product manufacturing and in the provision of services and in planning for new products, facilities, processes and services; and

Employees must work in a safe and healthy workplace, with the appropriate controls, training, work procedures, and personal protective equipment.

- *Community Engagement*

Respect the traditions, cultures and laws of the countries in which the Suppliers operate and seek to employ local people on projects wherever possible.

Quality

Kazan Soda strives for continuous improvement in all facets of operations and expects the same from its Suppliers. Suppliers will maintain a documented quality system that utilizes process controls and emphasizes defect prevention in addition to defect detection. Including:

- *Communication*

Promptly notify Kazan Soda of changes to goods or services that may adversely impact its product usage, service usage and/or business relationship; and

Notify in advance of any plans to discontinue goods or services and channel all communications on terms, conditions and pricing through designated Kazan Soda supply chain or departmental representatives and obtain prior approval before soliciting or reaching out to others in Kazan Soda.

- *Business Resumption and Contingency Planning*

Develop, maintain and test the Supplier's business continuity and disaster recovery plans in accordance with any applicable regulatory, contractual and service level requirements.

- *Outsourcing and Subcontracting*

Not to subcontract services performed for Kazan Soda or outsource activities that directly impact the delivery of goods and services to Kazan Soda, without prior written approval;

Provide Kazan Soda with information relating to the locations of where the work will be performed, including the possibility of cross-border movement of any Kazan Soda data, and the identity of parties involved in the provision of the services;

Where Suppliers are outsourcing certain activities in connection with Kazan Soda, monitor the outsourcing or subcontracting engagement to ensure compliance with the Suppliers' contractual obligations and with this Code, and provide evidence of such monitoring to Kazan Soda upon request.

- *Information*

Give a timely response to requests for information, technical assistance, or corrective actions; commit to openly share information on all elements of cost and cost improvement initiatives; and share sustainability and related data and, if necessary, cooperate in a sustainability audit.

- *Service*

Accept only specifications and requirements that can be met; provide prompt and professional customer service; and comply with purchase order and contractual obligations regarding schedules and deliveries for goods and services.

- *Process Development*

Partner to develop process improvements and new applications, in addition to providing goods, services or innovations that give Kazan Soda a technical, process or service advantage over our competition.

- *Productivity Improvements*

Assist with research and the implementation of productivity improvements that result in lower costs every year as well as provide ideas and solutions that will improve the cost of goods and services.

- *Effective Use of Electronic Commerce*

Cooperate to improve efficiency of interaction through the utilization of e-sourcing, e-invoicing and other web-based electronic tools upon Kazan Soda's request; include purchase order numbers and reference numbers, where applicable, on all transaction documents; and participate in the automation of procure-to-pay processes, when applicable.

Compliance

This Code is supplemental to any contract between Kazan Soda and Suppliers. To the extent that more specific or stringent terms are agreed in a contract, the contract terms shall control. Suppliers must maintain management systems and controls to promote and facilitate compliance with applicable laws and the principles set forth in this Code. Suppliers should also apply these or similar principles to the subcontractors, suppliers and other third parties they work with in providing goods and services to Kazan Soda

If you have any questions about this Code, you should contact your local Kazan Soda procurement representative.

Monitoring and Reporting of Violation

Kazan Soda reserves the right to assess and monitor Suppliers' compliance with the requirements set forth in this policy by conducting periodic audits (on site or otherwise) and third-party assessments following reasonable prior notice to Suppliers.

Any person with reason to believe that the spirit or principles of this Code are not being respected by a Supplier is asked to report to:

E-mail: [etik@kazansoda.com]