

PASABAHCE CODE OF CONDUCT

The main basis of the Paşabahçe Code of Conduct, create, implement and follow up needed social and physical conditions with taking into account, national and international legislations, Universal Declaration of Human Rights, the Children's Rights and Business Principles, UN Guiding Principles for Business and Human Rights, OECD Guidelines, UN Global Compact and International Labour Organization (ILO) Conventions and Recommendations.

This document defines, adopted, implemented and attempted to improve social, ethical and environmental relationship, between Paşabahçe Company, Paşabahçe workers and Business Partners (subcontractors who are working in our factory) behaviors.

That should be considered, a complete compliance process requires too much time, source and efforts. Because of this reason, Paşabahçe Code of Conduct participators shall commits to perform a sufficient amount of effort to comply with stated objectives.

Legal Compliances

We commit to work in harmony with all applicable laws, regulations within the scope of minimum industrial standards, particularly workers' rights in the Republic of Turkey signed the ILO, and UN Conventions, occupational health and safety and environmental issues for published with all legal regulations and Şişecam Union Policies and Working principles.

Workers Involvement

We commit to improve good management practices in order to workers and representatives will be able to exchange information properly and properly work in accordance with defined objectives of Paşabahçe Code of Conduct. We take the responsibility to inform employees about their rights and duties.

In addition, trainings and briefings are being conducted to ensure a harmonious working condition between managers, workers and workers' representatives.

The union has the right to put up a notice board where anyone can see, for news and reports about the activities of workers in their workplaces. In addition, unions, can organize carrier

conferences, courses, seminars, training activities and they can use the employer facilities for these activities.

Business Partners Involvement

Current and future business partners (subcontractors who are working in our factory) commit by signing to accept to terms and to take measures for implementation of our Code of Conduct. In case of detection of behavior contrary to the rules, Paşabahçe monitors business partners to correction of nonconformities. Essential of the correction of nonconformities and compliance with Code of Conduct, is to fulfil maximum correction in specified time period.

Freedom of Association and Collective Bargaining

Our workers have rights to establish Association and Collective Bargaining in free and democratic way. No one can discriminate against workers because of trade union membership. No one can prevent workers' representatives from having access to workers in the workplace or from interacting with them. Unemployed union managers can access in to the company and enter into dialogue about workplace issues and disputes with company union representatives and members.

No Discrimination

Our workers do not discriminate exclude or have a certain preference for persons on the basis of gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in unions or any other legitimated organizations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, diseases or any other condition that could give rise to discrimination. In particular, workers shall not be harassed or disciplined on any of the grounds listed above.

Fair Remuneration

Paşabahçe respect to right of the workers to receive social rights, additional wages, overtime payments, premiums and similar payments besides a fair remuneration to provide a decent life for themselves and their families regarding to the law and company regulation. The minimum remuneration does not below mandated by governments' minimum wage legislation. Requirements are to be followed on the basis of the Collective Bargaining Agreements.

Wages are to be paid in a timely manner, regularly, and fully in legal tender. The level of wages is to reflect the skills and education of workers and shall refer to regular working hours.

Deductions will be permitted only under the conditions and to the extent prescribed by law or fixed by collective agreement.

Decent Working Hours

Working hours, overtime working, weekly holidays and shifts are defined according to limits set by national legislation.

In the case of use voluntary overtime, working to be acceptable with only workers willingness and limits are set by national legislations. The use of overtime is meant to be exceptional, voluntary and paid regarding to collective agreements and shall not represent a significantly higher likelihood of occupational hazards. Furthermore, Paşabahçe shall grant their workers with the right to resting breaks in every working day and the right to at least one day off in every seven days.

The end of using overtime, Paşabahçe has to provide the proper transportation for workers.

Occupational Health and Safety

Paşabahçe, shall provide the proper working environment and occupational health and safety training program in order to protect workers healthy living right.

Paşabahçe comply with occupational health and safety regulations, with international standards and domestic legislations to protect workers healthy working and living right. Vulnerable individuals such as young workers, new and expecting mothers and persons with disabilities, shall receive special protection.

Paşabahçe establishes systems in place to detect, assess, avoid and respond to potential threats to the health and safety of workers. Also effective measures are taken to prevent workers from having accidents, injuries or illnesses, arising from, associated with, or occurring during work. These measures are intended to minimizing so far as is reasonable the causes of hazards inherent within the workplace.

Paşabahçe facilities have their Emergency Action Plans, emergency exits and evacuation roads are clearly indicated and the workers have the right to exit the premises from imminent danger without seeking permission. These action plans are periodically revised according with the legislations. All workers are periodically educated with understandable level of Occupational Health and Safety courses. Observed deficiencies are corrected with corrective and preventive measures

Working conditions and equipment are essentially to be ergonomic and safe. The use of drugs and addictive substances during working hours is prohibited. Drinking water, safe and clean eating and resting areas as well as clean and safe cooking and food storage areas are provided. Furthermore, business partners shall always provide effective Personal Protective Equipment (PPE) to all workers free of charge.

Occupational Health and Safety Committees have been established in order to actively cooperate between management and employees and / or their representatives, developing systems with the aim of ensure a healthy and safe working environment and finally implementing those systems.

No Child Labour (Child who shall not be less than 15 years, but more than 14 years old.)

We do not employ directly or indirectly children below the minimum age of completion of compulsory schooling as defined by law, which shall not be less than 15 years (must have turned at least a day into 16). Practical measures are taken to avoid child labor with the recruitment procedure. Appropriate age-verification mechanisms are established as part of our recruitment process, which may not be in any way degrading or disrespectful to the worker. In case children worker who is under age of defined by law is detected despite all the precautions, we act in a proactive way to protect children from any form of exploitation and necessary precautions is to be taken the necessary measures to protect affected children. When appropriate, we shall pursue the possibility to provide decent work for adult household members of the affected children's family.

Special Protection for Young Workers (Young workers who shall be not less than 18 years, but more than 15 years old.)

Young workers do not work at night and in heavy and dangerous conditions. Young workers shall not be employed a kind of work which may be harmful to their health or development and prevent their attendance at school because of their working hours, also shall be provided increase their participation in vocational orientation and their capacity to benefit from training programs.

During the recruitment of young worker and employment period, safety, health, physical, mental, moral and psychological development, personal skills and abilities are taken into account. Young workers who attend school may employed in a kind of work which not prevent their attendance at school, their success at school, their preparation for vocational choice or their attendance vocational education recognized by the authorities.

Vocational training opportunities are given to young workers to do an internship or vocational training due to the status of their school in extent of workplace.

Necessary mechanisms to prevent harm to young workers are set with special attention to the access young workers shall have to effective grievance mechanisms and to Occupational Health and Safety trainings schemes and programs.

Those employers who convicted of crimes against children and convicted of infamous crimes can not employ young workers.

Grievance Mechanism

There is a grievance mechanism in the level of effective business ethics for individuals and communities that may be affected in a negative way. Our employees can report any non-conformities when a violation or the probability of violation occurs of legal obligations, this Code of Conduct or customer's Code of Conduct. Employees who made this notification shall not be disclosed and the privacy of employees is protected. Our employees as well as our subcontractors can use this grievance mechanism.

Ethics Committee has been found in order to comply Code of Ethics in Community operations, to evaluate practices against to the Code of Ethics, to generalize ethical culture throughout the Community and to increase awareness on this subject. Inside or outside of the community, anyone can access to the Committee by electronic mail, mail, phone and other communication tools.

Furthermore, it's been provided for our employees and third parties can access directly to General Manager via genelmuurlepaylas@sisecam.com or via the link <http://www.sisecam.com.tr/en/contact-us/contact-us> by choosing "Write to General Manager" from subject title.

No Precarious Employment

Our recruitment and employment practices established on the basis of a recognized and documented employment relationship, in compliance with national legislation, custom or practices, international labor standards and collective bargaining agreement, whichever provides greater protection. Before entering into employment, it has been provide workers with understandable information about their tights, responsibilities and employment conditions, including working hours, remuneration and terms of payment.

During recruitment, copies of identity cards are taken and original identity documents are delivered to employees without any retention.

Decent working conditions that also support workers, both women and men, in their roles as parents, and arising from law, especially including migrant and seasonal workers.

We do not use employment arrangements in a way that deliberately does not correspond to the genuine purpose of law. This includes – but is not limited to - (a) apprenticeship schemes where there is no intent to impart skills or provide regular employment, (b) seasonality or contingency

work when used to undermine workers' protection. Furthermore, the use of sub-contractors in the facility may not serve to undermine the rights of workers.

Forced Labor, Harassment, Abuse, Mistreatment

Any form of forced and bonded labor is strictly prohibited. Any kind of system like forced labor, continuous apprenticeship, illegal employment and non-voluntary employment do not apply to running at our factories. Forced labor can not be implemented as a disciplinary practice. Workers have right to terminate their employment by giving reasonable notice to the employer. Sanctions does not apply for this reason.

Employees shall not be forced to stay at work after their working hours finished.

We ensure that workers are not subject to inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse.

Deductions from wages are allowed by only under conditions described in the law, to the extent permitted by law and as specified in the Collective Bargaining Agreement.

All disciplinary procedures must be established in writing, and are to be explained verbally to workers in clear and understandable terms.

We behave toward our employees with respect and dignity. We avoid any kind of physical or mental pressure on our employees and mistreatment. Tolerance to any kind of insult and harassment will not be shown which cause working environment turn into a hostile place with undesirable words, visual, physical and other threatening behaviors.

Protection of the Environment

We work in compliance with effective policies and procedures that reflect our responsibility towards the environment and evaluate the impact of our activities within the limits set by local laws, regulations and all the relevant regulations in order to avoid damage to the environment. We take the necessary measures to avoid or minimize the bad influence on society, natural sources and general environment. For this purpose, we try to reduction, eliminate and avoid all forms of pollution by preparing waste management plans. We provide efficient and apparent trainings to ensure environmental awareness and sensitivity and involvement of employees. Environmental performance reports are prepared in order to monitoring and controlling continuous development of our activity.

Ethical and Fair Business Behaviour

Sisecam Community has implemented Bribery and Corruption Prevention Policy as an indication of its sensitivity about business ethics. Employees are supposed to show sensitivity to this issue due to its characteristic as an act requiring legal punishment additional to business ethics and to approach it as a part of their personal duty and responsibility.

This policy as an integral part of the Code of Ethics comprises not only Group employees, but also all business partners that serves the community or acts on behalf of the community.

Sisecam Community committed to adapting to the laws and regulations, universal legal rules, ethical and professional principles within the context of bribery and corruption of all countries where it operates and represented. Our community acts with “zero-tolerance” approach against bribery and corruption and committed to maintain its activities fair, honest and according to legal and ethics rules under this policy.

We aim to work in accordance with law and in ethical manner. Any form of corruption, fraud, embezzlement or bribery shall not be accepted.

We keep accurate and reliable information regarding our activities, financial documents and business records in accordance with applicable regulations and industry benchmark practices. Such information cannot be falsified or misrepresented in the supply chain.

Additionally, the collection, use and otherwise process of personal information (including that from employees, business partners, customers and consumers in their sphere of influence) shall done with reasonable care. The collection, use and other processing of personal information is to comply with privacy and information security laws and regulatory requirements.

Employees are not allowed to procure personal interests and interests for close relatives/friends by means of duties and responsibilities which affecting or may affect our employees to perform their duties in an impartial manner.

Employees are not allowed to take and request any gifts or benefits, which can cause impression of irregularities and affect our employees in an impartial manner and provide an unfair advantage with the exception of promotional materials.

Sisecam Code of Ethics is the basis of our ethical behavior and fair business practices.

