



# KAZAN SODA ELECTRIC CODE OF BUSINESS ETHICS

2020



# CONTENTS

ABOUT KAZAN SODA ELECTRIC	1	GIFTS AND ENTERTAINMENT	31
A MESSAGE FROM OUR CEO	2	BRIBERY AND FACILITATION PAYMENTS	32
A MESSAGE FROM OUR GENERAL MANAGER	4	HEALTH, SAFETY AND SECURITY	33
MANAGEMENT STRUCTURE	6	DIVERSITY	33
OUR VALUES	9	PHYSICAL ABUSE	34
HONESTY AND RELIABILITY WITHIN THE COMPANY	10	HARASSMENT	34
RESPONSIBILITIES OF THE COMPANY TOWARDS ITS EMPLOYEES	10	PERSONAL PRIVACY	35
RESPONSIBILITIES OF THE COMPANY AND ITS EMPLOYEES TOWARDS THE		CONFLICTS OF INTERESTS	36
PROTECTION OF THE ENVIRONMENT	11	POLITICAL ACTIVITIES	36
OUR RESPONSIBILITIES TOWARDS OCCUPATIONAL HEALTH AND SAFETY		CONTRIBUTIONS TO SOCIETY	37
AS A COMPANY AND EMPLOYEES	11	ENVIRONMENTAL MANAGEMENT	38
OUR BUSINESS ETHICS RULES	14	SELECTION AND FAIR TREATMENT OF SUPPLIERS	39
OUR RESPONSIBILITIES	16	JUST/FAIR COMPETITION	39
ETHICS BOARD WORKING PRINCIPLES	19	CAMPAIGN AGAINST MONEY LAUNDERING	40
NOTIFICATION AND RESOLUTIONS OF ETHICS RULES VIOLATIONS	20	OCCUPATIONAL HEALTH AND SAFETY	41
MANNER OF ETHICS RULES APPLICATION	22	TAXES	43
OUR EMPLOYEES AND ETHICS	25	APPLICATION OF THE CODE	44
OPEN MEETING	27	INVESTIGATION OF POSSIBLE VIOLATIONS OF THE CODE	44
PRODUCT SAFETY AND QUALITY	27	DISCIPLINARY MEASURES	45
ACCURACY IN FISCAL AND COMMERCIAL RECORDS	29		
USE OF COMPANY RESOURCES	29		
CONFIDENTIAL INFORMATION	30		
REPRESENTING THE COMPANY	30		

## ABOUT KAZAN SODA ELECTRIC

Kazan Soda Electric Inc. an affiliate of the Ciner Group, was founded in the year 2011 in Ankara to contribute to the Turkish economy, with the vision of being sustainable, kind to nature and environmentally friendly, innovative and so many other values, all while producing soda ash dense and sodium bicarbonate.

Within its 20 km<sup>2</sup> area of operations, it produces 2.5 million tonnes of soda ash dense and 200,000 tonnes of sodium bicarbonate from 1.6 billion tonnes of trona ore. With its 99.8% purity ratio, it produces the purest soda ash in the world.

Its products are exported to European, North and South American, African and the Asian Pacific countries, and the remainder is distributed within Turkey. Using solution mining technology, hot water is injected into the trona ore 600 m under the surface, causing it to dissolve and rise to the surface.

As a result of this technology, production is carried out in a completely harmless, environmentally friendly manner, respectful of human lives, agriculture and animal husbandry.

Products are shipped to over 40 countries with export targets of 600 million USD thanks to the logistical network of Kazan Soda Electric.

As one of Turkey's largest chemical exporters, the sodium carbonate (soda ash) and sodium bicarbonate products that Kazan Soda Electric produces are offered on the market around the globe.

Strategically, it serves as a leader in the global soda ash industry in terms of production volume, product quality and supply chain dependability, technology and process innovation, and safety and environmental standards- and it continues to improve every day.

The electrical and steam energy it requires for production is generated on-site by a natural gas cogeneration plant, and the remaining energy contributes to providing some of Ankara's electrical needs.

A MESSAGE FROM  
OUR CEO





Dear Stakeholders,

Ciner Group started its business in the mining and energy sectors, and continues today with additional activities pertaining to glass, chemicals, media and maritime.

Our experience in the energy and mining sectors is transferred to our products of soda ash and sodium bicarbonate and to the electricity generation plant by using the latest environmentally friendly technological technique of solution mining.

Drawing our strength from Turkey, we are increasing our operations abroad with the help of our distributors. With today's investments, by exporting products to over 40 countries, we are the largest soda ash producer in the world. We continue to provide social and economic development with our broad export network and our employment levels. As we continue to grow, we are aware of the fact that our sector and world face different trends and difficulties, and we act accordingly.

We are aware of the pressures on the environment caused by climate change and depleting natural resources and the need for a technological transformation. Within this scope, by doing our part

we have made positive developments in the area of sustainability in the year 2019.

We have adopted the approach of reducing the occupational health and safety risks to a minimum by managing with a holistic approach to global risks, a sustainable outlook, and our safe production processes.

As a result of our solution mining technique, the amount of waste produced is reduced to zero, minimizing the carbon emissions that would typically be released into the ambient environment during classical mining technique; and, we produce products with minimized environmental impacts by using processes that consume less energy. In this way, we have adopted a work model that contributes to the fight against climate change.

The economic and social value that we have created will lead our way to our success tomorrow. As the Kazan Soda Electric Kazan family, we whole-heartedly believe that with our unwavering support for this sustainable journey and with our collective knowledge, we shall achieve great success along the way. I would like to thank all of our stakeholders whose trust and support have never wavered on our way.

**CEO**  
**Gürsel Usta**



## A MESSAGE FROM OUR GENERAL MANAGER





Dear Stakeholders,

Our Kazan Soda Electric project which commenced operations in 2017 has an annual production capacity of 2.5 million tonnes of soda ash and 200 thousand tonnes of sodium bicarbonate, contributing both to our nation's economy and its employment policies.

We are continuing on this journey we started in 2011, assimilating to our long term strategic targets and to the 10 fundamental principles in the United Nations (UN) Global Compact and to our long term strategic targets.

As we prepared our report, we took care to not only include the subjects that are of particular importance to Kazan Soda Electric, but also those that are of importance to you, our stakeholders. As Kazan Soda Electric, we endeavor to support the transformation to a low carbon economy in the global fight against climate change. Within this framework, we not only give priority to environmentally friendly production, but also to annually obtaining and sharing with you, our stakeholders, the ISO 14064 Carbon Footprint certification that documents our carbon footprint and the ISO 14046 Water Footprint that documents our water footprint from accredited third party establishments.

We aid in the development of all stakeholders we work with to reach the standards of Kazan Soda Electric.

In order to leave behind a more livable planet for future generations, with the knowledge of our responsibility towards society and the environment, we are focused on the efficient use of resources and circular economy solutions. We continue to generate value-added and positive impacts in this area with our superior performance for all of our stakeholders. Environmental sustainability is always kept as a top priority.

We continue to work to improve our performance regarding carbon, energy, waste and water; and to minimize our negative impacts while tracking our impact targets. The environmentally friendly and innovative technologies that we have developed are important contributions to the existence of a sustainable ecosystem. Evolving from here, we bring to life business models that take into consideration economic, environmental and social progress; and we are focused on a broad spectrum of activities that will decrease our carbon footprint ranging from material selection to product design and from production to recycling programs.

By sharing our policies with our stakeholders, we guarantee an effective partnership and open communication. We would like to thank you, our valued stakeholders, for contributing to the development of this sustainability report and for being with us every step of the way.

**General Manager**  
**M.Tanzer Ergül**



# MANAGEMENT STRUCTURE

Kazan  
SODA ELEKTRİK

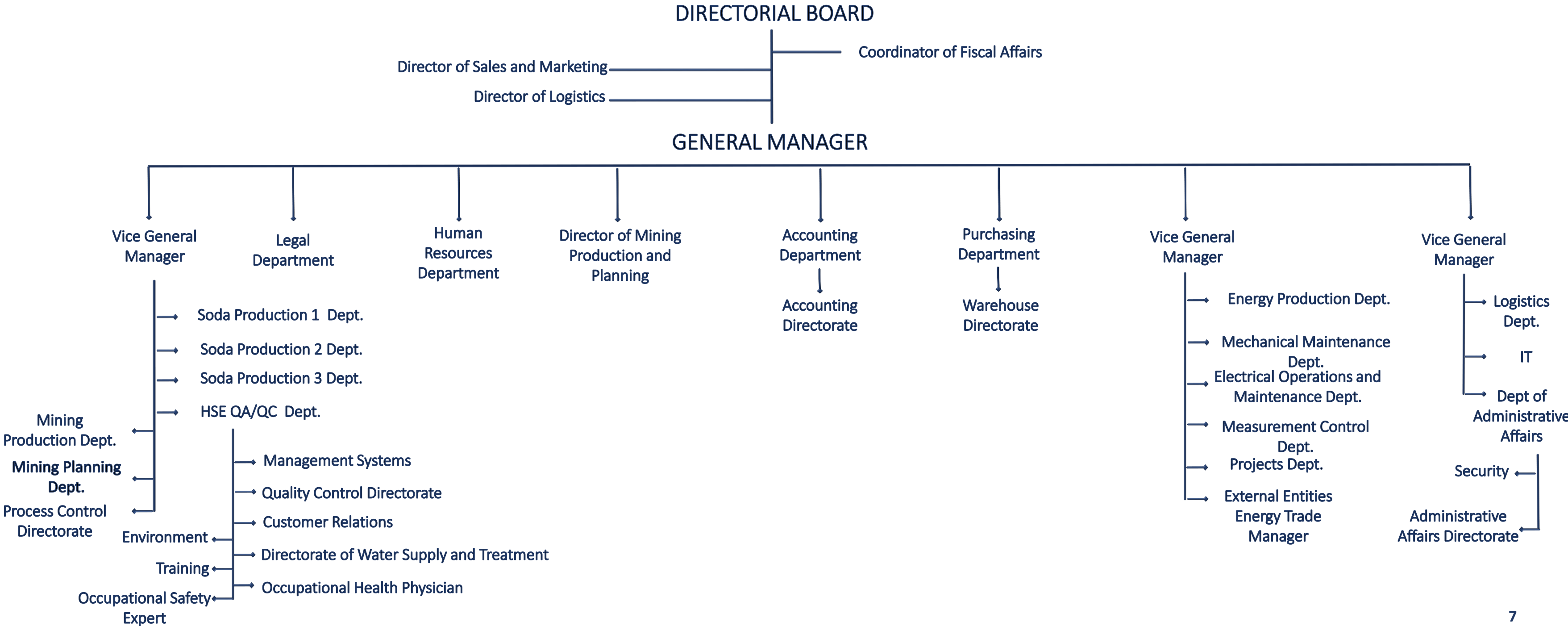


We aim for Kazan Soda Electric to be the perfect place to work. We are aware of the fact that our employees are our most important asset.



# MANAGEMENT STRUCTURE

At Kazan Soda the corporate management approach is based upon the principles of openness, transparency, just treatment and accountability. The corporate management implementations are based on active stakeholder participation, active audit mechanisms and transparent reporting, and is supported by advanced systems and standards.



# MANAGEMENT STRUCTURE

Kazan Soda Electric stands out with its strong management structure whose mission is to contribute to the economy of both Turkey and all locations we are found by increasing the quality of both production and services. This is accomplished with our vision to be the world’s leading producer of soda ash dense and sodium bicarbonate that follows technological developments, is sustainable, is sensitive to nature and the environment, is innovative and has the ability to add value; and our approach of giving importance to our young, dynamic and educated work staff, continuously developing, reinventing ourselves, and aiming for 100% customer satisfaction.

With the adoption of corporate management principles and corporate social responsibility understanding, and with the long standing approach that the environment must be used in an informed manner, Kazan Soda Electric believes that it is possible to create sustainable economic value through these principles.

A Board of Directors is part of the corporate management structure.

The persistent progress that Kazan Soda Electric has made in the area of corporate management has generated the base of stakeholder’s trust.

## BOARD OF DIRECTORS

Name-Surname	Title
Gürsel Usta	Chairman of the Board
Ali Coşkun Duyak	Vice President of the Board
Cevdet Özçevik	Member of the Board
Erdal Yavuz	Member of the Board
Orhan Yüksel	Member of the Board
Selçuk Yeşiltaş	Member of the Board
Mustafa Tanzer Ergül	Member of the Board and General Manager



# OUR VALUES

## Our Business Ethics Codes

Our Business Ethics Codes are our plain ethical statements that explain how we should do our job. We would like everyone working with us to set equally high principles for themselves.

## Our Values

Honesty, Respect, Responsibility and Leadership are our values and these are the simplest expressions of who we are. They guide everything we do.



## HONESTY AND RELIABILITY WITHIN THE COMPANY

Honesty and reliability are core principles of Kazan Soda Electric. Along with our values of leadership, responsibility, cooperation and quality, the principles of honesty and responsibility constitute the pillars of our company vision. Our company agrees to adopt and protect these values. To behave ethically means to do the right thing. By behaving ethically, we positively project the image and respectability of the company and our brands in the countries we are active in.

We all want to do what is right for the company. The Business Ethics Code (“The Code”) help by guiding us in this respect. It defines how employees should behave as representatives of the company. The Code concerns our responsibilities towards the company, each other, our clients, suppliers, consumers and official authorities.

All of us should abide by the law, behave ethically and honestly in every respect and take responsibility for all of our actions.

## RESPONSIBILITIES OF THE COMPANY TOWARDS ITS EMPLOYEES

Our company does not discriminate against employees during the process of hiring, decisions on salary or promotions according to qualities such as race, color, religion, gender, or physical disability. The principle of equality in working conditions has been adopted. Our company follows a policy based on the qualifications and performance of the employees regarding promotions and salary decisions. It shows the necessary attention towards the protection of employee personal information.

We ensure that the personal rights of employees are exercised completely and correctly. We approach the employees honestly and impartially, and guarantee a non-discriminatory, safe and healthy working environment. We strive for the personal development of our employees, support them in volunteering in appropriate social and public activities where they partake with awareness of social responsibility, and guard the balance between business and personal lives.



## RESPONSIBILITIES OF THE COMPANY AND ITS EMPLOYEES TOWARDS PROTECTION OF THE ENVIRONMENT

In all actions, our company acts in accordance with the environmental legislation, within the principle of social security framework. It determines the company procedures to be followed concerning this matter and ensures that the employees follow them. The employees are responsible for following the policies and procedures regarding the protection of the environment, and for reporting violations in this matter within the shortest time. Our goal is to realize our aims and goals regarding the environment, be a leader in environmental matters, protect the health of society, not to harm the environment and to spread these beliefs by aiming for improvement in all our actions.

Our company takes the measures necessary to protect occupational safety and health of the employees. Our employees are also responsible for following the legal regulations and procedures regarding occupational health and safety.

## OUR RESPONSIBILITIES TOWARDS OCCUPATIONAL HEALTH AND SAFETY

Dear employees,

### **Follow the Business Ethics Code and the Law**

Reading and understanding the Code is your responsibility. You are obliged to follow the text and contents of this Code. Unfamiliarity of the Code will not constitute an excuse to neglect its requirements.

You should act according to the law no matter where or under what circumstance you are. It should not be forgotten that unlawful behavior will become subject to legal proceedings and lawsuits. You should learn the laws, regulations and company policies and procedures regarding your work and follow them. Administrative systems and the legal department will help you regarding this matter.

## Review Your Actions and Consult

In case of doubting an action, evaluate it by asking yourself the following questions:

- Is it ethical?
- Is it legal?
- Will it bring a successful conclusion to the reputation of our company and of myself?
- Would I want to read about this in the newspaper?
- Would I avoid mentioning this to my family and relatives?

**If your response to any of these questions is “No”, then don’t take that action.**

Under no circumstances should you show behavior that will harm the reputation of our company. You should not take any action which you would avoid mentioning to your family or relatives, or would not enjoy reading about in the newspaper.

In some cases you may feel uncertain. Be cautious when you start making excuses such as “Everybody does it.”, “It’s only this one time.”, “Nobody will know.” or “It will not affect the outcome.”, or when others tell you these types of sentences. These are signs that you should stop and contemplate on the issue, or that you should consult others. Most importantly, trust your common sense.

In case of the accusations towards an employee constituting a crime or violating any law, members of the Ethics Board and the Legal Department will work together and carry out the investigation.



The important rule is this: do not hide violations of the Code, and do not participate in violations of the Code. Protect yourself, protect your company: ask questions, report it if you are not convinced. You can use any channel of communication to notify or consult about an issue. Administrators are responsible of reporting any notifications of potential violations of the Code to the Ethics Board within the shortest time.

The employees are responsible for notifying concerned departments about violations of the Code or suspicions of violation. This responsibility includes notification of when any of your administrators or colleagues ask you to violate the Code. All necessary precautions will be taken to prevent any negative repercussions on your behalf and to maintain confidentiality. When you notify members of the Ethics Board or your administrator, the decision to disclose your identity to facilitate communication is solely yours.

You may prefer to remain anonymous if you wish. If you disclose your identity, in accordance with a complete and impartial method of investigation,

members of the Ethics Board will take all reasonable precautions to maintain confidentiality.

Disclosing your identity will not have any negative affect on the processions in terms of evaluation of your notification. In order to help maintain confidentiality, avoid talking to your colleagues about these issues or any inquiries. If you would like to be informed about the results of the investigation, you may disclose your identity. Our company takes any notifications regarding possible behavioral mistakes seriously. The issue will be investigated in confidence, and correctional actions will be taken in case of detection of violation. If you are included in any investigation about the Code, cooperate and answer all questions completely and honestly. Do not conduct an investigation about a possible violation of the Code without the approval of the members of the Ethics Board. You should report actions against the law or the company policy as explained above. Members of the Ethics Board will evaluate the notifications and then inform the concerned authorities to start an investigation into the issue. The investigation may require a different expertise.



# OUR BUSINESS ETHICS RULES

You have many options for consultation.

You may request help from any of the units below.

- Your administrators
- Ethics Board
- Kazan Soda HR mail address: [ik@kazansoda.com](mailto:ik@kazansoda.com)
- Kazan Soda HR Hotline: 0530 257 46 94



# OUR BUSINESS ETHICS RULES

## **A. Honesty**

Truthfulness and honesty are our primary values in all of our business proceedings and relations. We act in truthfulness and honesty in all of our relationships with employees and all of our stakeholders.

## **B. Confidentiality**

Confidential information includes information belonging to Kazan Soda Electric which can create a disadvantage in terms of competition, contain trade secrets, include fiscal and/or other information not yet announced to the public, entail information regarding the personal rights of the personnel, personal data of employees, clients and our stakeholders, and include the information we are obliged to protect within the framework of “confidentiality agreements” made with third parties.

As employees of Kazan Soda Electric, we pay attention to the confidentiality and protection of the personal information of our clients, employees and other concerned parties and institutions we work with. We protect confidential information regarding the activities of Kazan Soda Electric, and use this information only to support Kazan Soda Electric’s objectives, and share this information with concerned parties only when authorization is provided. In our case, it is absolutely unacceptable to obtain commercial advantages through leaking any confidential information regarding Kazan Soda Electric.

Also, when we employees leave the company, we do not impart confidential information, documents and/or projects, regulations etc. that were obtained through our duties.

## **C. Conflicts of Interests**

As employees of Kazan Soda Electric, we aim to avoid conflicts of interests. We do not gain personal profit from parties or institutions we engage in business with through personal, familiar or other relative relations by taking advantage of our current duty. We do not partake in any business operations outside of Kazan Soda Electric for the purpose of extra financial gain.

In the case of a potential conflict of interests if we believe that interests of the parties can be protected through legal and ethical methods, we apply these methods. When we are in doubt, we consult our Administrator, Human Resources Department or the Ethics Board.

## **D. Our Responsibilities**

Apart from our legal responsibilities, we pay attention to fulfilling the following responsibilities we bear towards our clients, colleagues, stakeholders, suppliers and business partners, our competition and society.



# OUR RESPONSIBILITIES





# OUR RESPONSIBILITIES

## 1. Our Legal Responsibilities

We run all of our activities and operations both inside and outside of Turkey within the framework of the laws of the Republic of Turkey and international law, and punctually present complete and apprehensible information to organizing institutions and organizations.

As we run all of our activities and operations, we keep an equal distance to all state institutions and organizations, executive formations, non-governmental organizations and political parties, without expectations of benefits and fulfil our responsibilities with this awareness.

## 2. Our Responsibilities Towards Our Clients

We work with a focus on client satisfaction, with the proactive understanding of replying to our clients' needs and requests in the shortest amount of time and in the most correct way. We present our services punctually and within the promised terms, and approach our clients with respect, honor, justice, equality and rules of courtesy.

## 3. Our Responsibilities Towards Our Partners

With the goal of prioritizing Kazan Soda Electric's continuity and creating value for our partners, we avoid taking unnecessary or unmanageable risks and aim for sustainable profit. We act within the frame of financial discipline and accountability, and manage the resources and properties of our company and our time of operation with the awareness of efficiency and economization. We pay attention to improving our competitive strength and investing in areas that have the potential for growth and those which will bring the highest return.

## 4. Our Responsibilities Towards Our Suppliers/Business Partners

As expected from a good client, we act impartially and respectfully, and pay the necessary attention to fulfill our responsibilities punctually. We attentively protect the confidential information of the parties and institutions we conduct business with.

## **5. Our Responsibilities Towards Our Competition**

We actively compete only in legal and ethical areas, and we avoid unfair competition. We support endeavors aimed at the creation of the targeted competitive structure within society.

## **6. Our Responsibilities Towards Society and Humanity**

With the mentality of being a good citizen, we act sensitively as a leader in social matters, and try to take on roles in appropriate activities in this regard in non-governmental organizations and services for the benefit of society. We act sensitively towards the traditions and culture of Turkey and the countries we conduct international projects in. We do not offer or accept bribes or services and/or products such as gifts which exceed the purposes in cost.

## **7. Our Responsibilities Towards the Name "Kazan Soda Electric"**

Our business partners, clients and other stakeholders trust us thanks to our efficiency and honesty. We try to maintain this reputation at the highest level.

We present our services within the frame of company policies, professional standards, commitments made and ethics rules, and we pay the attention necessary to fulfil our responsibilities.

We take care to serve in areas in which we believe to be professionally competent, and aim to work with clients, business partners and personnel who abide by the criteria of truthfulness and legitimacy. We do not work with those who harm societal morals, the environment and/or public health.

In front of the public and in moments when those listening are under the impression we are representing our company, we do not express our own opinions, but only those belonging to our company.

When we express our opinions about our duties and/or our personal choices in our relations with the press and on social media platforms, we act with the awareness that our opinions can be identified with our company.



# ETHICS BOARD WORKING PRINCIPLES





## NOTIFICATION AND RESOLUTION OF VIOLATIONS OF ETHICS RULES

If an employee becomes aware of a violation of the Business Ethics Code or legal regulations the company is subject to, the employees are mandated to report them directly to the Ethics Board, but if the issue directly concerns someone from the Ethics Board, then they should report it to the Legal Department.

Notifications to the company will be concluded and resolved according to the company's internal operations and procedures. Those who violate the Business Ethics Rules or company policies will face various disciplinary actions as far as being asked to leave the company if needed.

Disciplinary sanctions will be applied to people who approve, guide, or are aware of the inappropriate behavior and behavior which leads to the violation of the rules, but do not report them as is appropriate. Moreover, those who show negativity or negative behavior towards those who complain and report or help during an investigation will not be tolerated.

Lying and/or slanderous notifications will be interpreted as ethics rules violations. Any company employee who is lied about or slandered will be able to follow separate legal procedures under the Turkish Criminal Law, Labor Law, Code of Obligations and other related legislations.

### **A. Ethics Board**

Kazan Soda Electric Ethics Board was founded with the goal of resolving conflicts of interest, evaluating the notifications reported regarding violations of ethics rules and making the necessary consultation regarding the road, method and applications to be followed in cases of ethics rules violations, within the scope of the Business Ethics Codes. The Ethics Board is comprised of the following persons:

Director – Kazan Soda Electric Vice General Manager

Member – Kazan Soda Electric HSE Manager

Member - Kazan Soda Electric HR Manager and Accounting Auditor



## **B. Ethics Board Working Principles**

The Ethics Board runs its operations within the frame of the principles determined below:

Notifications and complaints and the identities of those who report or complain must be kept confidential.

Everyone who has reported to the Ethics Board will be under the protection of the Ethics Board due to their notification and they cannot face retaliation such as oppression, discrimination or bullying.

The Ethics Board runs the investigation under rules of confidence as much as possible.

It has the authority to request information, documents and evidence about the investigation directly from the department holding them. It can analyze all information and documents only within the scope of the subject of investigation.

From the beginning, the process of investigation is recorded through written reports. Information, evidence and documents are added to the report.

The report is signed by the director and members.

The investigation is handled urgently and a conclusion is reached as quickly as possible.

Decisions of the board are instantly put into effect.

Relevant departments and authorities are informed about the result.

As the board director and members practice their duties on the subject, they act independently and unaffectedly of the department administration and the organizational hierarchy. They cannot be oppressed or indoctrinated on the issue.

If the board deems necessary, it can seek expert opinion and make use of experts by taking measures in order not to violate principles of confidentiality.



# MANNER OF ETHICS RULES APPLICATION





## MANNER OF ETHICS RULES APPLICATION

Our MANNER OF APPLICATION cannot replace any of the existing policies, and you should continue abiding by the existing rules and standards determined by our workplace. Instead, these ethics rules aim to create a frame for these policies. Thus, it will be easier for you to understand the logic behind them. Yet, just as importantly, these rules are also a tool to help you with any question or dilemma about the manner in which you work. When you feel like you are facing a difficult ethical decision, always ask yourself the following questions:

1. Is it in accordance with our MANNER OF APPLICATION?
2. Is it legal?
3. How will my actions affect other employees and how would they react when they learn of my actions?
4. If I am in doubt, did I ask for help?

We know that some situations are not easy. When you are in doubt, the golden rule is to expose the problem and handle it openly.

It is best to direct it to the respective experts such as Accounting, Human Resources, Health and Security, Purchasing and other technical experts.

### **RESPECT TO INDIVIDUALS**

We expect all employees and departments to work together respectfully and openly. Thus, we can maintain a culture of loyalty, trust and cooperation throughout our business. We should value other people's opinions and accept the contributions of others. Teamwork should be encouraged and success should be shared, as should be failure. We should listen with generosity and if needed, share our information in accordance with the group's rules about confidentiality. Lastly, it is against the values of Kazan Soda Electric to speak ill of colleagues.

## **RESPECT FOR THE LAW**

As a ground rule, as we fulfill our duties, we should always respect the laws of the countries in which Kazan Soda Electric is active, as a business and as individuals. Kazan Soda Electric is committed to the letter and spirit of the law in effect especially regarding:

Human rights,

Prevention of child labor and exploitation,

Discrimination,

Working hours and remuneration,

Collective representation of employees,

Quality, health and safety standards,

Environmental corruption and bribery,

Taxation and correct transmission of fiscal information, and

Rights/Impartial competition.

Kazan Soda Electric tries to share these principles with business partners and make them abide by these principles as much as possible as well.

## **RESPECT FOR LOCAL CUSTOMS AND TRADITIONS**

We believe that the main messages of our manner of application are applicable in all of our businesses. We should ensure that we run our activities sensitively towards the cultural and social traditions of society. There might be times when the principles of these ethics rules differentiate from a certain country's local laws or customs. If this is the case, when the local law requires a higher standard than these ethics rules, then the local law will always be binding.

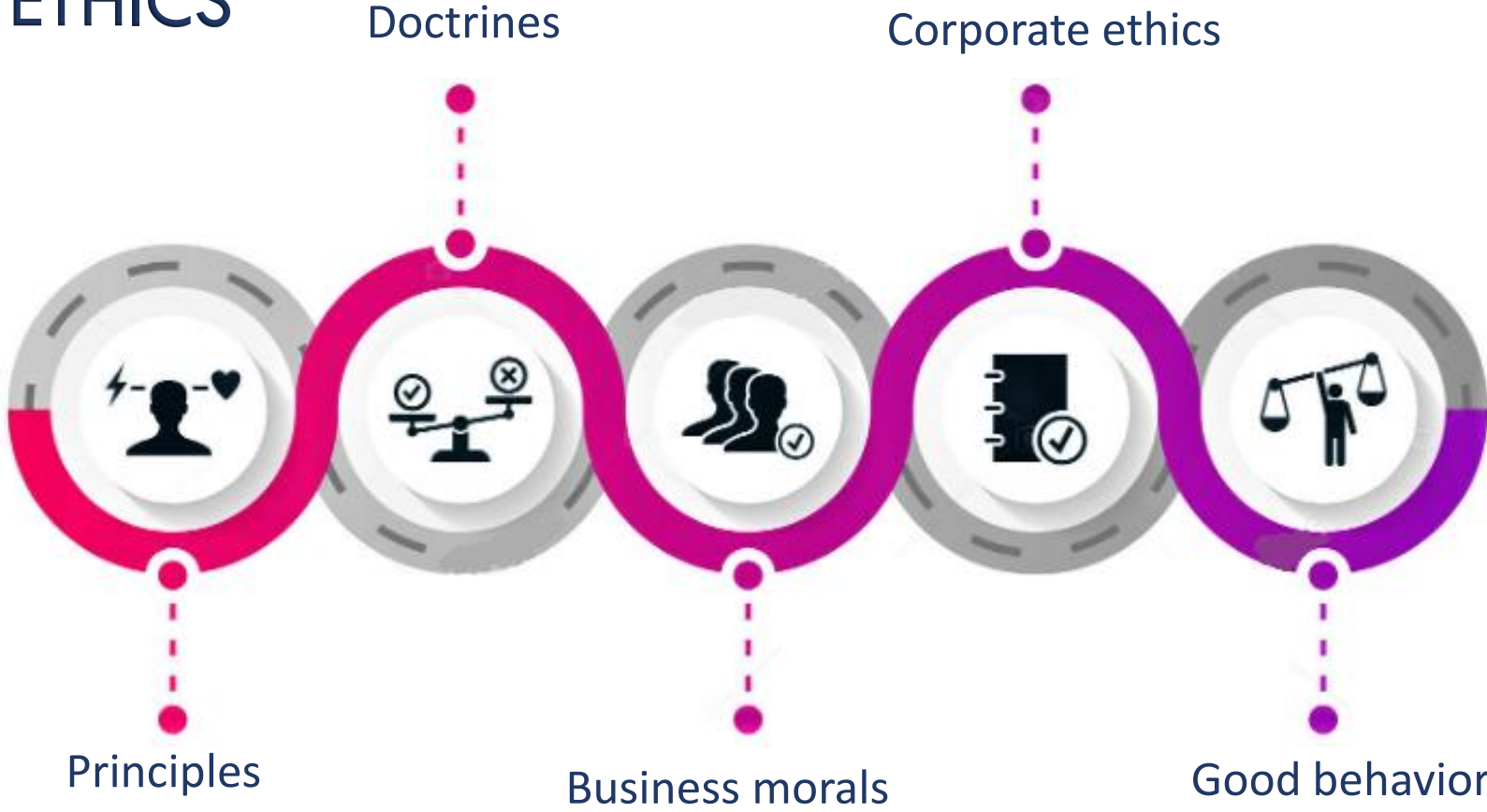


# OUR EMPLOYEES AND ETHICS





# OUR EMPLOYEES AND ETHICS



Kazan Sode Electric acts with the forethought of creating a corporate culture in which the principles of ethical behavior are adopted by all. All stakeholders that are interacted with are approached with an understanding of national human and worker rights compliance, fairness and support for progress. All employees are valued by the company. No decisions, especially those regarding employment, salaries, trainings, promotions, discipline, retirement pensions and dismissals are based upon discrimination of race, religion, nationality, social class, age, gender, marital status, sexuality, political leanings, disabilities or pregnancy. Physical, psychological violence and/or verbal abuse towards workers or discipline punishments as a means of scaring employees are not allowed. Please be sure that when misconduct and or policy breaches are reported the required identity security conditions are met to prevent retaliation. All employees can apply via the Employee Suggestion and Greivance Notification Form or the WhatsApp hotline to HR or to the Ethics Committee either in written or verbal form of any complaints or reports related to ethics implementations.

## OPEN MEETINGS

Kazan Soda Electric encourages a culture of openness where its employees can reveal their real concerns. All employees are expected to take personal responsibility to be in accordance with the Kazan Soda Electric Ethics Codes. We encourage all employees to express their opinions, defend their ideas, and point out unacceptable behavior and requests. We accept that employees may have concerns about certain applications, and that they may need advice and guidance to help ease said concerns. It is our policy to make sure that any good-willed claim made about the poor management of the company or its employees or on the side of business partners is investigated fully and that appropriate measures are taken to handle the results of the investigation. “Good will” means that even if you are proven wrong, you gave information honestly, which you believed was true at the time. We will give feedback without violating legal requirements and other confidentiality responsibilities to everyone who reported the problem.

## PRODUCT SAFETY AND QUALITY

Kazan Soda maintains its goal of being a preferred brand in the world and its product and service quality by fulfilling the requirements of ISO 9001, 14001, 50001, 27001, 22000; OHSAS 18001; ISO/IEC 17025 management systems; and BRC, FEMAS, HALAL, KOSHER, NSF, TS 897, and TS 898 product certificates.

It conducts all of its production activities in accordance with ISO 22000 Food Safety Management System and HACCP standards.

It informs existing and potential clients about topics such as production management, quality and quality management systems by offering tours of the production on site. Within this scope, Kazan Soda Electric can be audited by its clients upon request for soda ash dense and sodium bicarbonate, reaching their consumers in more than 40 countries.



It is Kazan Soda Electric's priority that the presented products are always safe and of high quality. It is our responsibility to present globally accepted quality and safe products to the consumers, and to maintain the consistency of this quality and safety.

The latest technology is employed during the production process and production is performed using solution mining, which is a 100% environmentally friendly form of mining. With the understanding of perfection in quality, controls are done online at the production stage, and in a laboratory environment at the end of production. Quality, safe products are always presented.

In order to improve consumer satisfaction, customer satisfaction research is conducted on the product level. The research results are effective in the processes of product and quality safety reviews..

Product safety and quality is always given the highest value. What earns us the trust of customers, reinforces the fame of our products and makes KAZAN SODA ELECTRIC continue its leadership in its own area is the high performance, quality and safety of our products, which are the indicators of our devotion and respect for our consumers.

All of us who are involved in the development, production, marketing, distribution and sale of our products are expected to follow the rules below:

Act in accordance with the law and legislations regarding product development and labeling .

Express opinions about product safety freely and openly in order not to overlook any product safety problems.

Ensure that the highest hygiene standards and strict quality controls are conducted at every stage of production.

Ensure that all negative reactions of consumers are reported to the Customer Relations Officer.

Respond instantly to any problems regarding possible product safety, tolerance, and quality control problems.



## ACCURACY IN FISCAL AND COMMERCIAL RECORDS

Accuracy is the most important factor for a successful business. This is a main factor in a company being able to continue its activities legally, honestly and efficiently. All of us have a responsibility to ensure that our fiscal records, or any other records, are accurate. All of us are expected to do the actions below:

- To fulfil our responsibility of ensuring that our fiscal and commercial records are always accurate.
- To keep the records safe and follow the principles regarding record keeping.
- To cooperate with our internal and external auditors.

## USE OF COMPANY RESOURCES

The purpose of company resources is to help the employees realize the goals of Kazan Soda Electric. Company resources that are misused or wasted, including employee time, damages all of us and Kazan Soda Electric's operational and financial performance. We are all expected to do the following: As a general rule, avoid personal use of company resources. Limited use of communication tools such as email, telephone and the internet is acceptable as long as it does not cause unreasonable expenses or conflict with our work responsibilities.



## CONFIDENTIAL INFORMATION

Unauthorized exposure of confidential information may damage Kazan Soda Electric. All of us should ensure that any information unknown to the general public should be kept confidential. Those of us who are authorized to access confidential information belonging to business partners are under the obligation of protecting them from exposure. All of us are expected to do the following:

- To prevent disclosure of confidential information to third parties outside Kazan Soda Electric (including with employee family members).
- To not discuss or work on confidential information in a public place where dialogues can be overheard or data may be endangered.
- To Ensure that you do not expose a previous employer's confidential information.
- To return all confidential information (including all copies of the original material) when leaving Kazan Soda Electric.

## REPRESENTING THE COMPANY

Kazan Soda Electric's reputation depends on the behavior of each of us. We are all expected to do the following:

- To act in Kazan Soda Electric's best interest.
- To display Kazan Soda Electric's values in our occupational behavior.
- To avoid speaking or writing on Kazan Soda Electric's behalf unless legally authorized.
- To avoid speaking or writing on subjects outside our personal expertise.
- To ensure that there is no confusion between your personal views and your company's views.



# GIFTS AND ENTERTAINMENT

Exchanging gifts and hosting may help create perspective and better work relationships, but they can lead to a conflict of interest between personal gain and professional duties.

When we are giving gifts or hosting, “the golden rule” is to be sensible and how it will be perceived from the outside. We are all expected to do the following:

- Never accept a gift or invitation from a supplier unless the value is truly symbolic.
- Never give or accept gifts as cash.
- Make sure all offered gifts and entertainment are compatible with Kazan Soda Electric’s values .
- When building a new business relationship, ensure at the beginning that all parties are informed of Kazan Soda Electric’s principles about gifts and entertainment.
- In return, learn our business partner’s policies about these issues.

- This can be very helpful to prevent any misunderstandings. When you receive any gift or invitation, notify your administration at once.
- It is forbidden for employees to have relations including gifts, invitations and/or entertainment with third parties including clients and suppliers that may create an impression of financial gain.
- Any gift that creates the impression of an irregularity other than materials that are given as a souvenir/special offer in accordance with legal and commercial manner, tradition or customs, and any gift that can create or be perceived to create a dependency (providing privileges or references, causing the win of a tender etc.) cannot be accepted or offered.
- Within the knowledge of higher administration, appropriate products and services can be accepted and/or products or services that comply with the receiver’s culture and ethical values can be offered as a gift.
- Employees cannot give any gifts to the customers and other third parties involved in business relations other than gifts and special offer materials that are promotional and approved by the higher management of our company.

## BRIBERY AND FACILITATION PAYMENTS

We believe that corruption is unacceptable. This type of behavior is against Kazan Soda Electric Ethics Codes and costs the company. Bribery is a way of corruption and it is illegal in most countries, especially when public officials are involved. Some countries have even banned “facilitation payments”. These are defined as payments that are used to secure or accelerate routine governmental processes such as arranging permits or releasing goods being held in customs. Most are in fact a type of bribery. All of us are expected to do the following:

Never offer or promise money or services (including gifts and entertainment) to public personnel, other formal authorities and those who can influence them.

- Never knowingly making these type of payments to third parties
- No matter the purpose, never accept, give or offer bribes and laundering money is unacceptable.
- It is essential to discontinue business relations with third parties (firms and business partners we purchase external services from) that request and offer bribes/corruption.
- Employees cannot receive advantages from third parties or institutions regarding their work, have private business relations, and request or offer payments.



## HEALTH, SAFETY AND SECURITY

Everyone working at Kazan Soda Electric has a right to have a healthy, safe and secure working environment. We are all expected to do the following:

Act in accordance with the rules of the company regarding health and safety in the workplace.

Take all rational measures to maintain a secure and healthy workplace.

Make sure that we do not endanger ourselves or others with our actions.

Make sure that we know what we need to do in case of an emergency in the workplace.

Report any behavior, facility or factor and all small accidents that can endanger the safety of our workplace to the administration.

## DIVERSITY

In Kazan Soda Electric, we believe in the value of diversity and see it as a great asset in our work. We are all expected to do as written below.

We should be sure not to discriminate on the basis of the following qualities:

- Gender
- Disability
- Personal status
- Sexual orientation
- Age
- Political and philosophical ideas
- Religious beliefs
- Union activities
- Racial, social, cultural or national origin

This is not only applicable for hiring, but for all decisions such as training, promotion, continuous employment and working conditions in general

## PHYSICAL ABUSE

Each of us has the right to be respected and to human dignity. In Kazan Soda Electric, this is the underlying principle of the manner of our work. No behavior or act that can violate this right, especially no form of harassment or physical abuse is acceptable. All of us are expected to do the following:

Avoid any harassment or physical abuse, to support and encourage the workplace pledge of Kazan Soda Electric where all abuse and harassment is shunned.

Be polite. Treat your colleagues the way you would want to be treated.

The following s will not be tolerated towards our employees or by our employees towards stakeholders with whom we are in business relations with:

- Any violation of privacy through physical, sexual and/or emotional harassment .
- Systematic behavior with the purpose of off-putting a person from work, reducing their performance, or causing them to resign.

- Possible negativity or negative behavior towards individuals who report cases of violation or help during the investigation is considered to be a violation of Ethical Behavior Principles.

## HARRASSMENT

Each of us has the right to be respected and to human dignity. In Kazan Soda Electric, this is the underlying principle of the manner of our work. No behavior or act that may violate this right, especially no form of harassment is acceptable. All of us are expected to do the following:

Avoid any type of sexual harassment.

Terminate any behavior instantly when it is stated to be unwanted.

Support and encourage the guarantee that Kazan Soda Electric is a workplace where any type of sexual harassment is rejected.



## PERSONAL PRIVACY

All of us have the right to privacy. The privacy of personal information of Kazan Soda Electric employees (such as their personal records, photographs and home addresses) is guaranteed. This type of data is only obtained and kept when needed for effective action by Kazan Soda Electric. If we are authorized access to personal employee data, we are expected to do the following:

- Ensure that we provide this information only to authorized persons, on a “need to know” basis.
- Ensure that we do not provide this information to anyone other than Kazan Soda Electric unless doing so is legally necessary or the employee personally gives their consent/authorization.
- Ensure that this information is kept securely .

- Avoid keeping this information longer than the necessary time allowed to fulfill the legal or commercial necessities that are allowed access.
- Avoid accessing or keeping personal employee data without appropriate authorization or a clear need related to business .
- Respect the personal privacy of our colleagues.

## CONFLICTS OF INTEREST

Kazan Soda Electric employees:

- Cannot receive loans and/or benefits from Kazan Soda Electric's clients or suppliers. They cannot obtain advantages real or in cash.
- Cannot be or be shown as a guarantor for the individuals they are in business relations with (Client-Seller), firms or people working in these positions.
- Are forbidden from receiving any benefits or loans from people related to their duties, business owners or people of this entity.
- Cannot use their duties and authority in any circumstance for personal or private gain for the benefit of themselves, their family or a third person.
- Our company's assets, resources and personnel cannot be used outside the company unless it is for our company's benefit, under any name or individual.
- All have the most important responsibility not to use the resources, name, identity and power of our company for personal use, and to avoid situations that will negatively affect the name and image of our company.

## POLITICAL ACTIVITIES

- Activities such as propaganda, demonstrations and such are not allowed within the boundaries of our company's workplaces.
- Employees cannot partake in any political activity within the working hours, and take up their colleagues' time.
- Our company's assets and resources cannot be used or allocated with the purpose of supporting political activities.
- Our employees' right to join political activities as an individual is respected, with the condition of openly revealing that they are not representing the company.
- Membership and joining the activities of any non-governmental organization representing our company is done within the knowledge of higher administration.



The employees should not do the following:

- Create a conflict of interest by joining the previously stated types of social and economic consultancy groups .

Kazan Soda Electric respects the rights of employees to join political activities as an individual but those who join political activities should openly reveal that they are not representing the company.

The following are expected of our employees who partake in political activities:

To reveal the fact that in no circumstances are they representing Kazan Soda Electric.

To absolutely avoid the use of company resources (including telephones, paper, email and other assets belonging to the company) in executing or supporting political activities as an individual.

## CONTRIBUTION TO SOCIETY

Kazan Soda Electric encourages its employees to play an active role in society.

We are all expected to do the following:

Support the projects working for public benefit that are supported by Kazan Soda Electric, by joining those of interest to you and those which you believe you can contribute to with your assets.

Involve Kazan Soda Electric only in activities that project our strategy of working for the public benefit while making sure that you project our corporate values.



# ENVIRONMENTAL MANAGEMENT

Kazan Soda Electric shows respect to the environment and tries to minimize its negative effects to the environment. Most of the activities to present our products to the market have a direct effect on the environment. It is everybody's responsibility to decrease this effect when possible. The smallest step taken in this matter is of importance.

We are all expected to do the following:

Fulfilment of Kazan Soda Electric's environmentally friendly processes guarantee

Supporting the use of renewable raw material and development of environmentally friendly packaging

In every step of our work, we should pay attention to how our actions will affect the environment. Thus, we can reduce the impact where it is possible.

Since wastematerial is unavoidable, we should ensure that the material can be recoverable or disposal is done with the feeling of responsibility.

We can make significant difference even by small efforts such as separating food waste in eating areas of the company.





## SELECTION AND FAIR TREATMENT OF SUPPLIERS

Kazan Soda Electric's relationship with its suppliers goes beyond the purchase and delivery of goods and services. This is an inseparable part of our long term commercial success.

All of us dealing with suppliers are expected to do the following:

Choose suppliers on the basis of open competitive proposals that grounded on objective measures in evaluating performance and service quality, and to ensure that all supplier proposals are compared and evaluated fairly and without favoritism

Be transparent about the proposal process and give honest and sensitive feedback to unsuccessful proposals.

Ensure that Kazan Soda Electric's general purchasing and payment conditions that include the company's ethical expectations are understood and agreed to by all suppliers no matter where they are active.

Give feedback to the suppliers on the basis of objective, transparent and consistent indicators.

Pay the suppliers punctually according to the agreed records and conditions (provided that the supplier has fulfilled the job according to the records and conditions of the contract).

## JUST AND FAIR COMPETITION

We are respectful to everyone in our professional lane, including our competition. We treat them just as we would like to be treated. Our leading position in the soda industry supports our duty to set a good example in this area. It is to our advantage to work in a sector where commercial applications are respectable. This makes our job easier and reinforces the trust of our consumers. The sharing of any information such as pricing, costs or marketing plans can lead to surface, real or perceived pricing, regional sharing or other types of manipulations and deteriorations in the free market.

We are all expected to do the following:

- Avoid contact with our competition in places where confidential information is discussed.
- Avoid encouragement of the clients or suppliers to violate their contracts with the competition.
- Avoid action that may cut off the supply resources of the competition.
- Avoid all kinds of derogatory statements about the competition.
- Immediately inform our department directorate if we have unintentionally obtained or used territorial or confidential information about the competition which legally only belong to them or third parties.
- Collect information about the competition only through legal methods and always introduce ourselves as Kazan Soda Electric employees when we are collecting such information .
- Never allow new employees of Kazan Soda Electric to share information about the competition they previously worked for.

## CAMPAIGN AGAINST MONEY LAUNDERING

In order to protect Kazan Soda Electric's reputation and to avoid criminal liability, it is important not to be associated with others' criminal activities (even if innocently). Kazan Soda Electric and its employees should ensure especially that Kazan Soda Electric does not earn income from criminal activities because an action against this can lead to a crime that requires a penalty for money laundering. This policy presents the main steps the employees should take in order to avoid being involved in money laundering.

The employees should do the following:

- If an actualized or potential money laundering activity is suspected, the Legal Advisor should be informed immediately.
- Warning signs about money laundering should be heeded.



Employees involved in duties of communicating with third parties such as new suppliers, clients and distributors or making contracts should do the following:

Ensure that the third parties in question are subject to a investigation/screening to evaluate their identity and legitimacy before contracts are signed or commercial operations are commenced.

Various factors will determine the appropriate investigation/screening methods and levels.

- With the guidance of the Business Principles Manager, the tools and processes should be used to facilitate the appropriate investigation/screening and record keeping should be determined.

Evaluate the investigation/screening results before deciding whether to conduct business with the third party or not.

The employees should not do the following:

- Assume that the related third party investigation/screening has already been completed.

Failing to check or update the investigation/screening periodically can put Kazan Soda Electric and its employees at risk.

## OCCUPATIONAL HEALTH AND SAFETY

Kazan Soda Electric has devoted itself to presenting healthy and safe working conditions. Kazan Soda Electric aims to follow all legislation and regulations, and to improve its health and safety performance. Everyone in Kazan Soda Electric has a role to play. Administrators, their juniors and third parties under their management are responsible for the expansion of occupational health and safety and its application. As a condition of our employment, it is a duty to work safely for all of us.

This Policy predominantly presents individual and collective responsibilities regarding health and safety. Employees should do the following:

- Work and behave safely
- Follow the health and safety procedures regarding a job and/or an issue they were trained for or informed of.

Support their team leaders in order to make sure that everyone they work with including the contractors and visitors, know and follow the effective health and safety procedures and instructions.

Only undertake tasks that they are trained, authorized, and medically cleared for in cases when they are sufficiently rested and careful.

- Ensure that they know what to do if there is an emergency in their workplace/on the road or where they are visiting.
- Immediately report any de facto or near misses or injuries, illness, unsafe or unhealthy situations, events, spills or leaks of material to the environment and thus correct, prevent or take steps to control the situation in question promptly.

All Kazan Soda Electric team leaders have general operational responsibilities regarding health and security in the location at the time and should to the following:

Provide notification regarding all events under the necessity of reporting accidents and near misses including a comprehensive investigation, a follow-up and communicating the lessons learned.

- Lead, report and test both field and duty emergency plans.
- Ensure that all employees, contractors and visitors are informed and trained about their tasks and activities in terms of health and security.

Employees should not do the following:

- Drive or perform similar or related activities under the influence of alcohol or any drug or while inappropriately taking medication.
- Continue to carry out any job which has become unhealthy or dangerous.
- Assume that another person will report a risk or concern.



# TAXES

Allocate committees, administrators and authorized experts and create and maintain an occupational health and safety system appropriate for their fields and teams including a system to collect the concerns/suggestions of the employees.

Detect health and safety hazards and manage/control the risks stemming from routine and planned operations, activities and services of the field, as well as their team.

Review all effective health and safety legislations including the related mandatory Kazan Soda Electric rules and to follow these legislations.

- Develop health and safety improvement goals appropriate to the field and duties, and to observe performance, including annually reviewing the efficiency and sufficiency of the management system.

Kazan Soda Electric ensures respect to all related tax laws, correct practices of tax obligations (documentation and final dates) and payment of all taxes these laws require completely. We are all expected to do the following:

Ensure that Kazan Soda Electric does not knowingly avoid tax obligations .

Do our part in correct and comprehensive record keeping.

## APPLICATION OF THE CODE

The Code of Ethics was designed to maintain consistency with regard to how employees should behave within the company and in their relationships outside the company. Procedures have been developed regarding what should be done in case of the Code being violated in order to maintain the consistency of the process within the organization.

The Code cannot include all situations. This code can be diversified in accordance with laws and contracts.

The Ethics Board has been formed with the purpose of ensuring the appropriate investigation of Code of Ethics violations, taking corrective actions in case of the detection of violation, and the eventual submission for approval for the purpose of determination and application of the disciplinary action. The appointment of the members of the Ethics Board is done by the Kazan Soda Electric General Manager.

The Ethics Board analyzes the report presented as a result of the investigation conducted and in cases of violation of the Code, makes a decision regarding the suggested corrective action and appropriate disciplinary penalty. The decision is served to the subject of the decision after the approval of the related senior manager.

## INVESTIGATION OF POSSIBLE VIOLATIONS OF THE CODE

The company takes all Code violation reports seriously. Our company thoroughly researches all claims in confidence..

Employees subject to investigation due to a possible violation of the Code will have the opportunity to be heard before the last decision is made.

Those who have been declared as having violated the Code via a decision and have new information not considered by the Ethics Board can request a review of the violation and disciplinary decisions.



## DISCIPLINARY MEASURES

Our company strives to take disciplinary measures against every violation of the code appropriate to the nature of the violation and the situation in question. Our company uses a graded disciplinary system. Warning notes are given for less important rules violated for the first time. Violations of a more significant nature can result in a cut of progress payments and bonuses or dismissal.

When it is understood that an employee has violated the Code, a copy of the document with the final decision and the warning note are added to the employee's personal folder as a part of their record of conduct. The final decision is served to its subject by the Human Resources Department.