



ALPPLAS

CODE OF CONDUCT

January 2017

1. LEGAL COMPLIANCE

All employees, managers and Board members in the Alpllas shall comply in all their business activities with all applicable laws, rules and regulations. In situations where local or national law does not provide adequate guidance, Alpllas applies its own policies and procedures. In the event that local or national law conflicts with the principles contained in this code, the law shall prevail.

2. WORKPLACE SAFETY AND WORKER HEALTH

Occupational safety and health management are top priorities at Alpllas.

Worker protection and occupational health and safety provisions must be strictly observed to prevent health hazards.

Safety at work is a primary duty of each and every individual. Managers are important role models in this respect.

Alpllas plans and operates its facilities in strict compliance with safety regulations. Thus reduces the risk of accidents and ensures that all systems operate smoothly.

Managers must be aware of their responsibility and corporate duties with regard to safety at the workplace.

They must ensure that the employees who work in any Alpllas facility are carefully selected and properly trained. Health and safety should take appropriate action to prevent, and manage, potential workplace accidents and illnesses.

Details on health and occupational safety are contained in Corporate Employee Regulation and Corporate Work Safety and Training Guideline.

3. PRINCIPLE OF NON-DISCRIMINATION

Discrimination, harassment and abuse are not tolerated.

No one shall be disadvantaged, favored or harassed as a result of race, ethnic origin, skin color, nationality, sex, religion or beliefs, disability, age, veteran status, pregnancy, sexual orientation or other characteristics that are protected by law.

All forms of workplace harassment, including sexual harassment, are strictly prohibited.

Everyone has the right to be protected from harassment, no matter if the alleged harasser believes that his or her behavior is acceptable or whether the alleged victim would be capable of avoiding the harassment.

It is every manager's duty to set an example by his or her own behavior and to ensure that the area for which they are responsible is free of discrimination and harassment.

4. CHILD LABOR AND FORCED LABOR

Child labor is not tolerated in any form.

No person younger than the age of 16 shall be employed. For authorized minors, management is responsible for providing age-appropriate working conditions, hours of work and wage, in compliance with applicable local law.

Forced, involuntary, or trafficked labor is not tolerated in any form. This includes indentured, bonded, and unapproved prison labor, and other forms of working against one's own will or choice.

5. CONFLICTS OF INTEREST

Employees of Alpllas must not accept, demand, offer or grant any personal advantage in conjunction with the activities they perform on behalf of the company.

Employees have a duty of loyalty to Alpllas and are therefore expected to always act in the best interests of the Company.

A conflict arises when the personal interests or activities of an employee influence or have the potential to influence the exercise of his or her judgment in the performance of his or her duties. Conflicts of interest and even the appearance of a conflict of interest may compromise the reputation of the Alpllas and must be avoided.

Alpllas respects its employees' right to privacy in their personal activities and financial affairs. It is the responsibility of each employee to ensure that his or her personal conduct complies with the principles, which are not intended to address every potential conflict situation.

5.1 Employment or Affiliation with a Competitor, Supplier or Customer

Full-time employees may not act as directors, officers, employees, consultants or agents of entities that compete directly with the business of Alpllas or do business with companies such as customers, suppliers or business partners of Alpllas without the approval of the Board.

5.2 Independent Business Ventures

Employees may not engage in independent business ventures or agree to perform services for other businesses if the activity will interfere with the employee's devotion of time and effort to the conduct of the business of Alpllas or otherwise affect his or her ability to work effectively.

5.3 Personal Benefits, Gifts, Bribes and Kickbacks

Employees may not use their position as an employee of Alpllas to derive or secure any personal, financial or other benefit for themselves or their relatives. An employee may not solicit and/or accept any gift or favour from any competitor, supplier or customer except to the extent customary and reasonable in amount and not in consideration for any improper action by the recipient. The offering or accepting of bribes, payoffs or kickbacks made directly or indirectly to obtain an advantage in a commercial transaction are strictly prohibited.

Although the principles above refer only to employees of Alpllas, employees should also exercise care to avoid actual or potential conflicts of interest that may arise because of the activities of their immediate family members and other members of their household.

6. ENVIRONMENTAL PROTECTION

Alpllas is committed to preserve natural sources in order to provide a habitable planet to next generations.

Alpllas strives to ensure that its products, services and production contribute to sustainable development. Cognizant of its responsibility to the environment; Alpllas strives to comply with all applicable environmental laws and regulations. Employees are expected to support the efforts of the Company to develop, implement and maintain procedures and programs designed to protect and preserve the environment.

Details on environmental implementations are contained in Corporate Environment Manual and Training Guideline.

7. POLITICAL INVOLVEMENT

Alpllas observes neutrality with regard to political parties and candidates. Neither the Alpllas name, nor any resources controlled by Alpllas, shall be used to promote the interests of political parties or candidates.

8. TRANSPARENCY

Transparency generates confidence

All financial transactions by Alpllas must be reported in accordance with generally accepted accounting practices, laws and regulations. Accounting records must show the nature of all transactions in a correct and non-misleading manner. Alpllas is committed to ensuring transparency in its financial reporting.

9. PROTECTION OF ASSETS

9.1 Protection of Data

Data and other information, which becomes known to an Alpllas employee while working for the company, may only be used as authorized. Before disclosing any such information to persons inside or outside the company, it is the responsibility of each individual to ensure that the recipient is entitled to receive such data and information. Depending on the significance of the

information, additional safety measures may be required, such as confidentiality agreements or audits.

9.2 Responsible handling of third-party intellectual property.

The confidential information and know-how of third parties must be respected and protected. Such knowledge should be used if it's obtained by lawful means or if it has been acquired from publicly accessible sources. Third-party commercial property rights (patents, designs and brands) must be respected and may only be used with the permission of the respective rights holder.

9.3 Protection of company's property.

Every employee is responsible for the protection and correct usage of property and other tangible assets belonging to Alpllas. Equipment and other items owned by the company (e.g. vehicles, tools, spare parts, office supplies, documents, computers, data media, etc.) may only be used for company purposes. They must be protected from loss, theft, damage or misuse. Employees are not permitted to remove any such item from the company's premises without permission.

10. IMPLEMENTATION OF THE CODE

All Alpllas employees are required to adhere to Code of Conduct and adopt its principles as the binding standard for performance of their day-to-day work duties.

All managers are required to inform their staff of the content and significance of the Code. Managers must do everything within their power to help staff to act lawfully. Any indications of violations of the law must be rigorously investigated. Managers must, at regular intervals and on their own initiative, verify compliance with the law and communicate regularly with staff on this issue.

Culpable violations of the law committed by employees while working for Alpllas may result in sanctions or even termination of employment. If such violations of the law cause damages, this may also result in the employee bearing personal liability and being subject to any penalties or fines imposed by the courts or authorities.

11. COMPLAINTS AND REPORTS OF MISCONDUCT

Any employee can and has the right to report a violation or suspected violation of the Code of Conduct, or of any applicable law, rule or regulation have an obligation to Alpllas. At the employee's discretion, the contact for this purpose can be the direct supervisor or any member of top level manager.

An employee who, with a reasonable, good faith basis, honestly believes that the Code of Conduct has been or might have been violated and who makes use of the right to report this to Alpllas will not suffer any kind of retaliation.

In each such case, Alpllas will take the necessary steps to protect the employee against such retaliation.

To the extent possible and legally permissible, Alpllas will maintain confidentiality about the identity of any employee who follows this procedure to report a violation or suspected violation of the Code of Conduct.

All Communications Concerning Code of Conducts:

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