



ALPPLAS

CODES OF ETHICS

January 2017

5.1 Employment or Partnership with Competitors, Suppliers or Customers

A full time employee may not serve as a manager, employee, advisor or corporate representative for any company operating in a direct competition with the business operations of Alplas or for any customer, supplier or business partner of Alplas without the approval of the Board of Directors of Alplas.

5.2 Free Business Enterprises

An employee may not engage in any free business enterprise, which may have an impact on the time and effort required to perform their duties and tasks at the company or, which may influence their capability of working for the company.

5.3 Personal Benefits, Gifts, Bribes and Commissions

An employee may not make use of their position as an employee of Alplas in order to obtain or secure any personal, financial or other benefits for themselves or for their relatives.

An employee may not request and accept any gift from any competitor, supplier or customer, in excess of a reasonable amount, which may cause them to act improperly.

It is strictly prohibited to offer or accept any direct or indirect bribe, payment or repayment intended to obtain an advantage for a commercial transaction.

Although the above-mentioned principles are valid only for the employees of Alplas, an employee should also be careful to avoid any actual conflict of interest that may occur due to the actions and behaviors of their immediate family members.

6. ENVIRONMENTAL PROTECTION

Alplas gelecek nesillere yaşanabilir bir gezegen sağlamak için doğal kaynakları korumayı taahhüt eder. Alplas, ürün, hizmet ve üretimin sürdürülebilir kalkınmaya katkıda bulunmasını sağlamaya çalışmaktadır.

Alplas çevreye karşı sorumluluğunun farkında olup, yürürlükteki tüm çevre kanunlarına ve yönetmeliklerine uymaya çalışmaktadır. Çalışanların, çevreyi korumak ve korumak için tasarlanmış prosedürleri ve programları geliştirmesi, uygulaması ve bakımını yapmak için şirketin çabalarını desteklemesi beklenmektedir.

Çevresel uygulamalarla ilgili ayrıntılar Kurumsal Çevre El Kitabı'nda ve Eğitim Kılavuzunda yer almaktadır.

7. POLITICAL ACTIVITIES

Alplas remains impartial to political parties and candidates.

The name of Alplas or any source controlled by Alplas may be used to support a political party or candidate.

8. TRANSPARENCY

Transparency brings trust. All the financial transactions carried out by Alplas should be reported in line with the generally accepted accounting principles, applicable laws and regulations.

Accounting records should reflect the nature of all the transactions in a way that is accurate and that is not misleading.

Alplas commits that it ensures transparency for its financial reports.

9. PROTECTION OF ASSETS

9.1 Data Protection

Any information that may come to the knowledge of an employee may be used only in a manner that the employee is authorized. Before the disclosure of such information to those within or outside the company, one must be sure that they are entitled to obtain such information or data. Depending on the level of importance of such information, additional security measures may be taken such as confidentiality agreements or audits.

9.2 Responsibilities concerning Third Party Intellectual Properties

Confidential information and experience of third parties should be respected and protected. This information should be used only if it is obtained legally or public sources. Any third party commercial property right (patents, designs and brands) should be considered and, used only if permitted by the respective owners to do so.

9.3 Protection of the Company's Properties

Each employee is required to protect and properly use all properties and tangible assets of Alpllas.

Any equipment and other items owned by the company (e.g. vehicles, tools, spare parts, office equipment, documents, computers, data media etc.) may be used only for the company purposes. All the equipment and materials must be protected against loss, theft, damage or misuse. An employee is not entitled to take any item out of the company's premises without a valid permit.

10. ENFORCEMENT OF THE CODES OF ETHICS

Each employee of Alpllas is required to comply with the codes of ethics and conduct and, adopt such principles as a standard during the performance of their tasks and duties.

The managers should inform the employees who report to them of the content and importance of the codes of conduct. A manager should do anything required within the scope of their powers to help an employee act legally. Any finding indicating that an applicable law is violated must be strictly analyzed. The managers should verify the legal compliance at certain intervals and with their own initiatives and, contact the personnel accordingly on a regular basis.

In case of a faulty violation of an applicable law during the performance of a work for Alpllas, the respective employee may be subject to a sanction or dismissed. In case of a violation resulting in loss, the respective employee may be held personally responsible and, subject to a penalty or fine imposed by the competent courts or authorities.

11. NOTIFICATION OF SUSPICIONS AND DOUBTS, AND COMPLAINTS

Each employee may report and is entitled to report to Alpllas about an actual or suspicious breach of these Codes of Ethics, the applicable laws, regulations or legislations. To do that, an employee may at their own discretion apply to their own manager or a member of the senior management.

In case an employee, who sincerely believes that there are concrete clues that the Codes of Ethics are actually breached or may be violated, use the right to notify Alpllas accordingly, there will be no adverse consequence against them.

In such case, Alpllas takes measures to protect this employee from any disadvantage if necessary.

Communication Concerning The Codes of Ethics

Head Office

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