

ALBA PLASTIK SUPPLIER SUSTAINABILITY POLICY

2019

English Version



Alba Plastik Supplier Sustainability Policy has been arranged in such a way as to provide the integration of sustainability in the supply chain, in the society, in the management with the operations and corporate strategy for all these parties.

This policy of ours has the principles which include the human rights, environment, working conditions, and business ethics.

Akın LEVENT

Genel Müdür / General Manager

Our policy is to affect change while operating in their wide- range supply chains and in their own enterprises with the suppliers who share these principles with us and who undertake them.

Our policy is based on internationally accepted standards.

We support the Guiding Principles of the UN with respect to the Business and Human Rights.

In line with the fundamental principles, for our Human Rights Undertaking we take as our basis such treaties and agreements as Human Rights Universal Declaration, International Civil and Political Rights Agreement, International Economic Social And Cultural Rights Agreement, and International Human Rights Code and ISO standards which include the International Labor Organization's Declaration relating to Basic Principles and Rights at the workplace.

In order to comply with the valid laws and to fight against all sorts of corruption, we support the Instructions of the OECD relating to Multi-National Corporations and the Undertakings and Commitments which come out as a result of these instructions.

The same approach is projected to our third party compliance materials, especially to the Responsible Business Partner Policy.

- Works are carried out legally and honestly
- Works are carried out on the basis of the employment conditions which are accepted freely and certified
- All the employees are equally treated within the framework of respect and dignity
- Works are carried out on the basis of voluntariness
- All the employees are at convenient ages
- All the employees are paid fair wages
- Work hours are reasonable for all the employees
- The health and safety of all the employees are protected at the workplace
- All the employees have the right to reach fair procedures and solutions
- Including the native peoples, the land rights of the communities are protected and supported
- Works are carried out in such a way as to adopt sustainability and decrease environmental impact
- Environment and Natural Resources

1. Works are Carried out legally and honestly

Compliance with Laws:

All the laws and regulations are complied with in the countries where the suppliers operate. All the International laws and regulations which are in effect are complied with such as sanctions, export controls, and reporting liabilities including data protection and anti-trust/competition laws.

Bribery:

A prohibition is imposed in relation to all sorts of bribes, corruptions, and seizure by violence or embezzlement and misappropriation, and proper procedures are in place in order to prevent bribes in all sorts of commercial processes and operations that are taken on by the supplier.

Conflict of Interest:

All sorts of conflicts of interest that the supplier is aware of and that are related to any commercial relationship shall be reported to Alba Plastik in order that Alba Plastik can be given the chance to carry out the appropriate activity and take necessary action. It will be reported to Alba Plastik before entering into a commercial relationship with Alba Plastik whether or not a governmental officer, a representative of a political party, or an employee of Alba Plastik has any shares or beneficial interests in the enterprise of a supplier.

Gifts and Hospitality:

All sorts of commercial entertainment or hospitality will be kept at a reasonable level only for the purposes of continuation of good commercial relationships, and such entertainment and hospitality shall never have the purposes of influencing the decision of how the future business will be shaped and awarded. Gifts must be seldom presented and they must always be legitimate and conform to the company's policies.

Confidential Information and Competitor's Information:

All the competitors' information is obtained and used legitimately and in accordance with the laws and regulations in effect. No attempt is made in order to disclose any information about the competitors to Alba Plastik. Similarly, unless it is openly and clearly allowed by Alba Plastik, confidential information must not be shared any third parties.

Financial Records, Money Laundering, and Information Disclosure from Inside:

All the affairs relating to the business and commercial transactions are carried out transparently, and they are recorded in the books and records of the supplier correctly. No attempts or endeavors are made with respect to money laundering. The confidential information of Alba Plastik that a supplier has are not allowed to be used for the purposes of doing information trade from inside or for supporting such trade.

Protection of Information and Property:

Alba Plastik's confidential information and know-how and intellectual property are respected and protected. All the information provided by Alba Plastik which is not open to the public is confidential, and used only for the planned objectives. All the personal information about individuals are handled within the framework of complete respect with respect to protection of confidentiality and all the relevant confidentiality laws and regulations.

Product Quality and Responsible Innovativeness:

The products and services are delivered in such a way as to meet the features, qualities, and security criteria indicated in the relevant agreement documents, and they are suitable for the usages that are aimed. Research and development activities are carried out in a responsible manner, and they are based on generally accepted scientific, technological, and ethical principles.

Notification of Concerns and Worries and Not Retaliating:

All the employees (whether directly employed or not) are provided with tools and means so that they can utter their concerns and worries about the subject requirements and needs, and the employees with good intentions who have uttered their concerns are protected by means of some processes against retaliations.

2. Works are carried out based on the freely accepted and certificated employment conditions

Employment documentation which is freely agreed, legal and showing respect to their contractual rights is submitted to all the individuals who work on a permanent or temporary basis.

3. All the employees are treated with respect within the framework of dignity

All the employees are treated within the framework of respect and dignity. None of the employees can be subjected to any sort of physical, sexual, psychological, or verbal harassment, abuse, or any sort of intimidation and mobbing. No discriminations are allowed during such processes as employing, indemnification, promotion to a higher position, discipline, termination, or retirement. Discrimination is prohibited with respect to race, ethnical roots, age, duty, gender, gender identity, color of skin, religion, country of birth, sexual preference, civil status, pregnancy, dependents, disabilities, social class, labor union membership, and political views. Especially with respect to those employees who may be exposed to discrimination, care must be taken for their rights.

4. Works are carried out on the basis of voluntariness

The suppliers are never allowed under any conditions to employ compulsory or illegal labor, borrowed labor, labor based on loans, or any other type of compulsory labor. Mental and physical pressure, slavery and human smuggling are all forbidden.

5. All the employees are at suitable age

The suppliers are never allowed under any condition to employ employees under the legal age, for working or education (whichever is higher) and employees under the legal minimum age. When young workers are employed, they must not do the kinds of works that are mentally, physically, socially and ethically dangerous or harmful or that will intervene with their education by depriving them of going to school.

6. All the employees are paid fair wages

All the employees are presented with a complete indemnification package which include salaries, overtime work payments, fringe benefits, and paid vacations and which meets or exceeds (whichever is higher) the legal minimum standards or suitable valid industry

standards, and indemnification conditions that are decided with binding employment agreements and these agreements are conformed to.

7. Work hours are reasonable for all the employees

It is not necessary that the employees and workers should work longer than the normal work time allowed by the laws of the country where the employees and workers are employed. All the overtime work done by the employees and workers are done voluntarily.

8. All the employees' health and safety are protected within the workplace

In order to prevent the work accidents that may take place during the work hours or as a result of the operations of the employer and that come out in connection thereto, a healthy and safe work environment is provided.

9. ALL THE EMPLOYEES HAVE THE RIGHT OF ACCESS TO JUST PROCEDURES AND SOLUTIONS

All the employees are presented with transparent, fair, and confidential procedures which provide a fast, neutral and objective and fair solution of the difficulties which may come out as part of their work relationships.

10. The rights of land of the communities including the native peoples are protected and supported

The rights and ownerships of the individuals, native people, and local communities on their properties and lands are respected. With respect to the properties and pieces of lands and including their usage and transfer, all the negotiations comply with approval by giving information beforehand without a charge, and they also comply with the transparency of the agreement and with the principles regarding disclosure.

11. The Works are carried out in such a way as to adopt sustainability and to decrease environmental impact

The operations are carried out for the purposes of supplying, production, distribution of the products and provision of the services and for the protection of the environment.

12. Usage of the Environment and Natural Resources

Alba Plastik deals with effective usage of natural resources, decreasing water usage, decreasing wastes in their origin, and continues with its operations in this respect. Our company also shows due diligence with respect to struggling against global climate change, decreasing sera gases emissions, efficient and effective energy usage.

IN THE EVENT OF BREACH;

- i. All sorts breaches regarding this policy that the supplier is aware of must be notified to Alba Plastik at the shortest time possible. Failing to do this shall mean a breach of this Sustainability Policy.
- ii. We strongly support the speaking out of both our suppliers and employees against the real or suspected breaches of this policy without the fear of retaliation.
- iii. The suppliers, their employees and workers, or their contractors may notify Alba Plastik about the real or suspected breaches of this policy by a telephone call or online. The reports may be sent in line with the laws confidentially and anonymously.
- iv. Alba Plastik shall investigate all sorts of concern that have been brought forward and share the findings with the supplier. The supplier is liable to help with respect to such investigations and provide access to the information which is reasonably requested.
- v. If improvement and betterment is required, the supplier shall with immediate effect prepare the corrective actions and implementation plans and make a time chart in order to effectively solve the issue of breach, and will inform Alba Plastik about them.
- vi. All the suppliers who have signed procurement agreements with Alba Plastik and our indirect suppliers are considered to have accepted and undertaken this Sustainability Policy of Alba Plastik. Our policy is transmitted to our suppliers together with the procurement agreements.

The below mentioned principles, standards, and agreements have been used in preparing this Supply Policy, and therefore, they may be useful additional information sources:

- International Labor Organization: www.ilo.org especially based on the below given address:
 - International Labor Organization Agreement with respect to work hours
 - International Labor Organization Agreement with respect to Minimum Age
 - International Labor Organization Agreement with respect to the Child Workmanship in the worst ways
 - International Labor Organization Agreement with respect to Employment By Using Force
 - International Labor Organization Agreement with respect to Removal of Employment By Force
 - International Labor Organization Agreement with respect to Equal Wages Payment
 - International Labor Organization Agreement with respect to Discrimination (Employment and Occupation)

- Work Principles published with respect to Struggling Against Bribery by Transparency International:
www.transparency.org

- Guide for struggling against bribery prepared by International Chamber of Commerce for Small and Medium Sized Enterprises:
<http://www.iccwbo.org/Data/Policies/2015/ICC-Anti-corruption-Third-Party-Due-Diligence-A-Guide-for-Small-and-Medium-sized-Enterprises/>
- United Nations Sustainable Development Targets:
<https://sustainabledevelopment.un.org/sdgs>

- Ethical Business Enterprise: www.ethicaltrade.org/