



## Supplier Code of Conduct

### Purpose

This policy has been established to clarify the expectations and obligations of suppliers, business partners and subcontractors (each a “Supplier” and collectively, the “Suppliers”) of Sisecam Chemicals USA Inc. and its U.S. affiliates (“Sisecam US”).

Sisecam US values its partnerships with Suppliers and fully recognizes that our mutual success is built on open communication and a commitment to common principles and business practices. Accordingly, Sisecam US has set high standards for the way it conducts business in the areas of regulatory compliance, social responsibility, and environmental stewardship. It is the responsibility of each Supplier to ensure that its employees, agents and representatives understand and comply with this Supplier Code of Conduct (“Code”).

### Ethics and Legal Requirements

Suppliers will conduct their business in a legal and ethical manner and act with integrity. Further, they will ensure that all third parties and subcontractors are in full compliance with contractual agreements and compliance requirements. Including:

- *Compliance with Applicable Laws and Regulations*

Meet and document compliance of all applicable regulatory and statutory requirements.

- *Avoid Conflicts of Interest*

Avoid any conflict of interest when interacting with Sisecam US employees.

- *No Bribery*

Refrain from engaging in any form of commercial bribery with its suppliers, agents or customers, nor offer any incentive to any Sisecam US employee or family member of a Sisecam US employee in order to obtain or retain business; and

Abstain from any form of governmental bribery with any political, regulatory or other government employee and comply with all applicable laws dealing with the bribery of government officials, including the U.S. Foreign Corrupt Practices Act; the Organisation for Economic Co-Operation and Development’s Anti-Bribery Convention, the UK Bribery Act and Turkish anti-corruption laws.

Effective February 10, 2022



- *Fair Competition*

Comply with all applicable laws regarding fair competition and antitrust.

- *Protect Information*

Safeguard Sisecam US's confidential information and act to prevent its misuse, theft and improper disclosure.

- *Identification of Concerns*

Provide means for Supplier employees and agents to report concerns or potentially unlawful activities in the workplace. Treat any report in a confidential manner. Investigate such reports and take corrective action if appropriate.

## Human Dignity and Labor

Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect. Including:

- *Modern Slavery and Human Trafficking*

Comply with applicable laws and regulations of the countries in which they operate with respect to slavery, servitude, forced and compulsory labor and human trafficking, including, without limitation, the UK Modern Slavery Act 2015;

Ensure the prevention, detection and reporting of forced or involuntary labor of any type and the trafficking or involuntary servitude of any worker; and

Demonstrate zero tolerance of forced or involuntary labor of any type and the trafficking or involuntary servitude of any worker.

- *Child or Forced Labor*

Comply with the applicable child labor laws of the countries in which they operate and have zero tolerance of child labor that is not in accord with local laws.

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- *Nondiscrimination*

Nondiscrimination in hiring practices on grounds of race, creed, gender, religion, national origin, age, disability or sexual orientation or other factors as mandated by the applicable laws of the countries in which they operate.

- *Fair Treatment*

Respect for workers, and a zero tolerance for any engagement in corporal punishment, violence or threats of violence, or other forms of physical coercion or harassment; and

Sexual harassment of employees will not be tolerated.

- *Working Hours, Wages and Benefits*

Working hours for Suppliers' employees will not exceed the maximum set by applicable law. Compensation paid to employees will comply with applicable wage laws. Employees must be paid in a timely manner in accordance with such laws.

- *Freedom of Association*

In accordance with applicable laws, respect the rights of employees to associate freely, join labor unions, seek representation, and engage in collective bargaining.

## **ENVIRONMENT, HEALTH AND SAFETY**

Sisecam US's commitment to sustainability includes efficient use of resources, respect for the environment, and safe and healthy workplaces. Sisecam US expects its Suppliers to make similar commitments to continuously improve their environmental, health and safety performance. Including:

- *Respect the Environment*

Collaborate to eliminate waste and cost from the supply chain such as programs to reduce emissions and waste, promote the efficient use of energy and natural resources, and encourage responsible management of their products and processes through their entire life cycle, and for their intended end use.

- *Protect Health and Safety*

Demonstrate and actively work to advance sustainable business practices and a clear commitment to a safe workplace by complying with Sisecam US' site rules and guidelines, the Supplier safety check list and applicable MSHA standards;

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Health, safety and security must be priorities in product manufacturing and in the provision of services and in planning for new products, facilities, processes and services; and

Employees must work in a safe and healthy workplace, with the appropriate controls, training, work procedures, and personal protective equipment.

## Quality

Sisecam US strives for continuous improvement in all facets of operations and expects the same from its Suppliers. Suppliers will maintain a documented quality system that utilizes process controls and emphasizes defect prevention in addition to defect detection. Including:

- *Communication*

Promptly notify Sisecam US of changes to goods or services that may adversely impact its product usage, service usage and/or business relationship; and

Notify in advance of any plans to discontinue goods or services and channel all communications on terms, conditions and pricing through designated Sisecam US supply chain or departmental representatives and obtain prior approval before soliciting or reaching out to others in Sisecam US.

- *Information*

Give a timely response to requests for information, technical assistance, or corrective actions; commit to openly share information on all elements of cost and cost improvement initiatives; and share sustainability and related data and, if necessary, cooperate in a sustainability audit.

- *Service*

Accept only specifications and requirements that can be met; provide prompt and professional customer service; and comply with purchase order and contractual obligations regarding schedules and deliveries for goods and services.

## Innovation

- *Process Development*

Partner to develop process improvements and new applications, in addition to providing goods, services or innovations that give Sisecam US a technical, process or service advantage over our competition.

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- *Productivity Improvements*

Assist with research and the implementation of productivity improvements that result in lower costs every year as well as provide ideas and solutions that will improve the cost of goods and services.

- *Effective Use of Electronic Commerce*

Cooperate to improve efficiency of interaction through the utilization of e-sourcing, e-invoicing and other web-based electronic tools upon Sisecam US's request; include purchase order numbers and reference numbers, where applicable, on all transaction documents; and participate in the automation of procure-to-pay processes, when applicable.

## Compliance

This Code is supplemental to any contract between Sisecam US and Suppliers. To the extent that more specific or stringent terms are agreed in a contract, the contract terms shall control. Suppliers must maintain management systems and controls to promote and facilitate compliance with applicable laws and the principles set forth in this Code. Suppliers should also apply these or similar principles to the subcontractors, suppliers and other third parties they work with in providing goods and services to Sisecam US.

Sisecam US reserves the right to assess and monitor Suppliers' compliance with the requirements set forth in this policy by conducting periodic audits (on site or otherwise) and third-party assessments following reasonable prior notice to Suppliers.

If you have any questions about this Code, you should contact your local Sisecam US procurement representative.