



# CODE OF CONDUCT

## Introduction

At UBC Chemical, our commitment to Corporate Social Responsibility extends beyond our legal obligations. This approach shall reflect how we conduct our business and how we engage with each other and business partners to continuously improve our performance.

UBC Chemical requires all external suppliers and their subcontractors to comply with this Code. The Code applies to all actors in the supply chain back to the origin of the raw material. The Code may include higher standards than required by national law. Should any requirement in the Code violate applicable law, the law takes precedence.

This Code of Conduct together with our policies and our rules for corporate governance, provides a strong framework for our activities. This Code, is supplemented by our ethic policies; Environmental Policy, Ethical Trade Policy, Employee Policy, Supplier Code of Conduct, Whistleblowing Policy, Product and Quality Policy and Procurement Policy.

Even though we're not yet a member of the UN Global Compact, as responsible business we enact the same values and principles and our policies reflect our commitment to the [UN Global Compact principles](#).

## Compliance

UBC Chemical, complies with the laws and regulations in the countries in which we operate and we require that our employees, suppliers and business partners do the same. Should a supplier or business partner fail to comply with our requirements, as a first resort we will try to solve the situation via cooperation and communication, as a last resort, terminate the relationship.

Should employees have a concern or encounter a material violation or misconduct of laws, legal requirements or the Code, we have an open-door policy. Their manager or management team are always ready to listen.

UBC Chemical takes all reports of possible material misconduct very seriously and will first investigate the matter confidentially before deciding whether the Code or the law has been violated. Corrective actions or remediation procedures will be carried out as needed. Anyone can report without fear of reprisal, and the necessary confidentiality and anonymity will be assured. Any form of retaliation against an employee who raises an issue honestly is a violation of the Code.

## Business Ethics

At UBC Chemical, we strongly believe in ethical principles. Guided by our business ethics we act as a good corporate citizen, as a company with high moral standards and we conduct our all our business in a lawful manner in compliance with anti-trust laws. UBC Chemical recognises that our ethical and social performance and reputation is a key part of our overall commercial success.



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We do not accept or offer bribes in any form and we work against all forms of bribery, corruption and unlawful trade practices in our business operations.

UBC Chemical is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about whose services they purchase.

UBC Chemical is committed to monitoring social standards in our supply chain and we encourage our suppliers to operate the same ethical standards we employ ourselves.

Where possible we trade according to the following Ethical Trading Criteria:

1. All employment is freely chosen
  2. Working conditions are safe and hygienic
  3. Child labour is not used
  4. Wages are fair and comparable to industry standard and will always exceed the minimum wage.
  5. Deductions from wages as a disciplinary measure shall not be permitted
  6. Working hours are not excessive
  7. No discrimination is practised
  8. Regular employment is provided for those who are employed on a permanent contract.
  9. No harsh, cruel or degrading treatment or practices are allowed
  10. No bribery, corruption, blackmailing or bullying is permitted.
  11. Third party suppliers and buyers are both free to sell and buy from any number of other businesses.
- No restrictions, as a way of guaranteeing business are allowed

### Human Rights

We support and respect internationally declared human rights and treat our employees fairly, equally and with respect.

UBC Chemical is committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. In many areas we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued. As we of course expand and become larger we will be able to offer more opportunities for our staff. We establish recognised relationships with our employees in accordance with existing legislation in Turkey or in any Country where we are obtaining products or sub-contracting. All employees are provided with an easy to read, formal contract of employment with particular clarity in relation to wages.

### Child Labour

In principle UBC Chemical is against the use of child labour and believes its long-term elimination is ultimately in the best interests of children.

UBC Chemical will not employ children or young persons under 18. All workers must have reached the age of 18, or have reached the minimum legal working age under national law, whichever age is the higher.

Young person refers to any worker over the age of a child, as defined above, under the age of 18.



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### **Working conditions are safe and hygienic**

We will as a minimum follow and comply with the standards according to the local laws and regulation regarding to the work place environment. Accidents and work-related injuries must be prevented and will not be taken lightly. We're under continuous audits and engaged in preventative measures in our business operations.

### **Working hours and remuneration are reasonable and comparable to other companies in our sector and regular employment is provided.**

Wages, benefits, overtime compensation and working hours in our operations shall at the very least comply with national legislations and laws.

- Staff pay rates are above the national legal minimum standards
- Staff are not forced to work in excess of 45 hours per week
- Staff are provided 2 days off per week
- Staff are given written terms and conditions of employment that details the employment relationship between and the respective obligations of the employee and the employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
- No deductions are made from wages as a disciplinary measure and pay slips detailing lawful deductions are provided for each pay period.
- Labour only, contracting, sub-contracting and fixed term contracts are not used as a means to avoid obligations under labour or social security laws

### **Forced Labour**

At UBC Chemical, every employee has the right to leave their job freely. Every employee will be employed by his or her own free will and we will not engage in any form of forced or compulsory labour.

### **No discrimination is practised**

There is no discrimination in pay, hiring, compensation, access to training, promotion and termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.

Opportunities for personal and career development are equally available to all employees.

No harassment, threats, abuse or intimidation shall be practised. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proved.

### **Environmental Impact**

Here at UBC Chemicals, we're continuously working to reduce our negative impact on the environment and searching for alternative natural sources to reduce our energy consumption and wastewater volume.



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Our understanding of sustainable development implies not compromising the ability of future generations to meet their own needs.

### Reference documents

UBC Chemicals;

- Environmental Policy
- Ethical Trade Policy
- Employee Policy
- Supplier Code of Conduct
- Whistleblowing Policy
- Product and Quality Policy
- Procurement Policy.

UBC Chemical's Directors have overall responsibility for all aspects of code of conduct at work within the business.

Confirmed by UBC Chemicals:

Burak Erenoglu

CEO,

A handwritten signature in blue ink, appearing to be 'Burak Erenoglu', written over a horizontal line.