 Alışan Den Hartogh	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

I. PURPOSE AND SCOPE

This policy aims to define the commitments required for employees to perform their duties in an ethical manner and to consolidate the general principles and policies of Alışan Den Hartogh Chemical Cleaning and Trade Inc. ("the Company"). The Company's core values and principles guide our code of business ethics and form the foundation for our expectations, standards, and ethical practices in all business relationships and operations.

The Code of Business Ethics covers the Company's fundamental principles of conduct. All employees must adhere to these ethical principles in the performance of their duties. Recognizing that business procedures, instructions, laws, and regulations may not provide full guidance on every behavior or situation, the Company's ethical code has been built upon its values. The list provided in this document should not be interpreted as exhaustive and may be supplemented by more detailed rules, subject-specific principles, and policies.

II. ETHICAL RULES AND PRINCIPLES TO BE FOLLOWED

A. Integrity

Honesty and transparency are among our top values in all our business processes and relationships. We act with honesty and integrity in all interactions with the government, our customers, employees, and all stakeholders.

B. Compliance with Legal Regulations

The Company's management is responsible for ensuring that operations are conducted legally, correctly, honestly, and reliably. All employees are responsible for complying with applicable laws and regulations. It is strictly prohibited for employees to tamper with any official documentation in the performance of their duties. Employees are also obligated to comply with deadlines and other limitations as determined by the relevant authorities during the preparation of official documentation.

	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

C. Protection and Proper Use of Company Assets

Employees must protect company assets and ensure their efficient use. In all resource usages carried out on behalf of the Company, the Company's interests shall take priority. Under no circumstances may Company assets, resources, or personnel be used outside the Company for the benefit of others or for any unauthorized purpose.

Proper use of resources for the Company's benefit also requires efficient use of time. During working hours, employees are expected to use their time productively and are not permitted to engage in personal business. Managers may not assign employees to perform personal tasks.

As a general principle, employees should refrain from receiving personal visitors during working hours. In exceptional cases where visitors must be received, meetings must be relevant to the visit and completed within a reasonable time so as not to disrupt the workflow.

Any misuse or abuse of company resources — including human resources, funds, vehicles, materials, time, etc. — is strictly prohibited.

Proper use of company resources for the benefit of the organization also requires efficient use of time. During working hours, employees are expected to manage their time effectively and refrain from engaging in personal matters. Supervisors are not permitted to assign employees tasks related to personal affairs.

As a general rule, personal visitors should not be received during working hours. In exceptional cases where visitors must be accepted, meetings must be directly related to the purpose of the visit and conducted within a reasonable duration so as not to interfere with the business workflow.

Any misuse or abuse of company resources — including but not limited to personnel, finances, vehicles, equipment, and time — is strictly prohibited

D. Relations with the Press and Media

The Company has an officially designated spokesperson. All inquiries from the media, financial institutions, and questions concerning sensitive information must be directed through this spokesperson. Providing statements to any press or broadcast organization, participating in interviews, or attending seminars and conferences as a speaker is subject to prior written approval from the Board of Directors. No personal gain can be derived from such activities under any circumstances.

	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

In all accessible online platforms, social media, print and spoken press, and other public channels, the following guidelines must be observed:

- Ensure the Company name and information are represented accurately.
- Provide accurate and truthful information about the Company.
- Refrain from sharing or disseminating false, misleading, incorrect, defamatory, or otherwise negative information about the Company.
- Avoid making any statements—positive or negative—regarding customers or firms visited, and do not engage in discussions or debates with third parties (natural or legal persons).

E. Protection of Trade Secrets and Confidentiality

Employees must not disclose any confidential or sensitive information obtained during the course of their duties related to the Company or its business partners, in any environment or form.

- Any information that could potentially put the Company at a competitive disadvantage, including trade secrets, unpublished financial data, personal employee information, and information covered under “Non-Disclosure Agreements” signed with third parties, is considered confidential.
- Employees are expected to protect confidential and proprietary information, use it solely for Company purposes, and share it only with authorized individuals as defined. Any commercial exploitation of such information is strictly prohibited. Employees must not remove or share any confidential documents, projects, or internal materials upon their departure from the Company.
- Confidential documents that require destruction must be disposed of in a way that ensures they cannot be recovered or read.
- Employees must avoid discussing topics involving sensitive or damaging information in areas where customers or third parties may be present.
- Company documents (e.g., procedures, instructions, forms, and business methods) and internal correspondence must not be shared with external parties. Their removal or electronic transmission outside the Company is strictly forbidden. If the sharing of such information becomes necessary (including with service providers under confidentiality agreements), prior approval from senior management must be obtained.
- Employees are not allowed to provide articles, statements, or information to media outlets or associated individuals regarding the Company, its strategies, or confidential matters without prior consent from senior management.
- Employees should also refrain from participating in discussions about the Company or its clients’ financial situations during social or private gatherings.

	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

F. Competition

Our companies and employees value legal, transparent, honest, and ethical conduct in all competitive activities. Alışan Den Hartogh’s approach to doing business is built upon the principles of ethical, fair, and effective competition. In accordance with applicable Competition Laws, any agreements, actions, or decisions that aim to or may result in the prevention, distortion, or restriction of competition—whether directly or indirectly—are prohibited.

Competition Law strictly prohibits activities that aim to eliminate or limit competition, divide markets, set prices in agreement with competitors, or tamper with bidding processes.

Both explicit contracts and informal “gentlemen’s agreements” are also considered violations of the law. Therefore, the following actions and behaviors are strictly forbidden:

Price Fixing: You may not agree with competitors on the purchase/sale prices of products or services or set prices collaboratively.

Market Allocation: You may not discuss competitors, customers, or markets with rival firms, or make agreements to divide market territories.

Gathering Competitor Information: Gathering, sharing, or using any information about competitors that is not publicly available is prohibited.


Bid Rigging: You may not collaborate with competitors to alter the outcome of a tender or influence its process. Communication regarding tenders is not allowed with companies participating in the same bid.

Boycotts: You may not boycott any supplier or customer solely because they are in a business relationship with a competitor.

Joint Ventures and Non-Competition Agreements: Without the approval of Alışan Den Hartogh’s Senior Management, you may not propose joint ventures, form partnerships, or enter into any agreement with competitors—even if it does not involve competition issues.

G. Discrimination

In accordance with the principle of equal opportunity, all employees work under decisions made without being subject to any discrimination or harassment based on race, color, language, religion, sect, gender, nationality, age, sexual orientation, or disability.

 Alışan Den Hartogh	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

H. Harassment and Abuse

Harassment is defined as being constantly subjected to demeaning or discouraging behavior, and includes, but is not limited to, physical, sexual, and psychological harassment or abuse. The company does not tolerate any physical or verbal harassment. Employees will be treated with respect and dignity, and behaviors that create a malicious and aggressive working environment or unwanted workplace behaviors will not be tolerated.

I. Avoidance of Conflicts of Interest

A conflict of interest is a situation where a person or institution improperly uses their position to gain personal or organizational benefits.

As a company, we aim to avoid situations that could lead to conflicts of interest in our business activities. All employees are expected to adhere to high standards of work ethics and professionalism, based on objectivity, and to avoid potential, actual, or perceived conflicts of interest while working on behalf of the company. It is unacceptable for employees to use their position for personal gain or for the benefit of others.

a) Not Doing Business for Personal Benefit

It is forbidden for an ALIŞAN DEN HARTOGH employee, their family members, or relatives to benefit from the employee's position within the company or enter into close relationships with individuals or organizations that could profit from the employee's decisions or confidential information. ALIŞAN DEN HARTOGH employees must ensure that their actions and behaviors do not result in personal gain for themselves or their relatives.

b) Acceptance and Giving of Gifts


Employees must not accept gifts or benefits that could influence their neutrality, decisions, or behavior, nor should they offer gifts or benefits to third parties that could create such influence.

c) Former Employees Doing Business with ALIŞAN DEN HARTOGH

Employees who leave the company and wish to do business with ALIŞAN DEN HARTOGH by starting their own company or partnering with another company must act in accordance with the company's interests both before and after the business process, ensuring no conflicts of interest arise. In such cases, prior approval from the Board of Directors is required before any business relationship is established.

d) Representation and Hospitality

Participation in activities (training, celebrations, conferences, promotions, launches, etc.) organized by clients, suppliers, or other stakeholders, with the potential to affect

 Alışan Den Hartogh	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

decision-making, is allowed only if these events are directly related to business and if the customer or supplier invites others in their usual business operations as well.

J. Anti-Bribery, Corruption Policy, and Money Laundering

ALIŞAN DEN HARTOGH has a policy that prohibits offering, accepting, or giving bribes on behalf of the company. Corruption is strictly unacceptable. Employees of ALIŞAN DEN HARTOGH may only accept or give gifts within the company and in accordance with the defined rules. Money laundering, the act of concealing the origin of criminal proceeds, is a serious offense and can lead to further crimes. It is strictly prohibited for the company or its employees to participate in or facilitate such activities. Employees will only conduct activities in compliance with the law and will not engage in or tolerate any illegal activities.

K. Neutrality

ALIŞAN DEN HARTOGH remains neutral towards all political parties and activities. The company neither provides assistance to nor participates in political activities. All business activities and transactions are carried out in a neutral manner, without any expectations of benefit from public institutions, administrative bodies, civil society organizations, or political parties, with the company fulfilling its responsibilities with this awareness.

L. Respect for Nature and the Environment

Protecting nature and the environment, and being sensitive to environmental issues, are core responsibilities of our companies and employees. We prioritize environmental sensitivity in our investments and support eco-friendly activities and collaborations within our capabilities.


III. OUR RESPONSIBILITIES

A. Legal Responsibilities

We conduct all of our activities and transactions both domestically and internationally in compliance with the laws of the Republic of Turkey and international law. We provide accurate, complete, and understandable information to the regulatory bodies and institutions in a timely manner.

B. Our Responsibilities Towards Our Customers


We work with a customer satisfaction-focused, proactive approach, responding to the needs and demands of our customers in the shortest and most accurate way. We deliver our services on time and under the conditions promised, treating our customers

	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

with respect, honor, fairness, equality, and courtesy. We carefully protect the confidential information of our customers.

C. Our Responsibilities Towards Our Employees

- We do not discriminate between our employees based on race, language, religion, gender, age, ethnicity, etc., in any of our work and communications. We make recruitment decisions based on the job requirements.
- Employment is based on voluntary principles, no one can be forced to work and is free to leave in accordance with legal requirements.
- We do not employ child labor below the minimum legal working age.
- We provide fair job and career opportunities for our employees and encourage them to take advantage of these opportunities.
- We support a communication environment where our employees can easily express their opinions and suggestions..
- We trust our employees' commitment and sense of responsibility. We have no doubts that they will always act with business ethics and avoid any conflicts of interest.
- We carefully protect our employees' personal information and will not share it with third parties inside or outside the company without their consent.
- We ensure a safe and healthy working environment, considering the existing knowledge of industry-specific risks. We respect and protect our employees' legal rights and basic human rights. We offer equal opportunities to all employees from the moment they are hired. We pay wages in accordance with the law and industry practices.
- We prioritize training to prepare our employees for the future, investing in them within the requirements and systems framework.
- We work within the legal working hours. We provide regular employment opportunities to our employees and respect their personal lives.
- We do not tolerate behaviors that disrupt the efficiency and trust of the work environment, including aggressive attitudes, threatening speech and actions, sexual harassment, and promotion of commercial, political, and religious objectives.
- We do not allow any form of exploitation or bullying towards our employees.
- We implement our disciplinary procedures and apply the rules specified in the laws.

 Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
	Release Date:	16.01.2009
	Revision Date-No Tarihi-No:	17.07.2023/04
	Review Date	05.02.2025

D. Our Responsibilities Towards Our Suppliers / Business Partners

We behave fairly and respectfully, as is expected from a good customer, and show the necessary care to fulfill our obligations on time. We carefully protect the confidential information of the individuals and organizations we do business with.

IV. IMPLEMENTATION

Every employee, supplier, and business partner of ALIŞAN DEN HARTOGH has the right and responsibility to report via the communication channels outlined in this procedure, either in writing or verbally, the following:

- Any actions or behaviors that violate applicable laws and regulations.
- Any actions or behaviors that violate accounting records, practices, regulations, procedures, and principles.
- Any actions or behaviors that undermine the internal control environment or contradict the company's practices and procedures.
- Embezzlement, corruption, fraud, abuse, and other similar actions, as well as all ethical violations related to corporate business principles.

All reports will be evaluated with the utmost confidentiality. The responsibility for maintaining confidentiality of all communicated matters lies with the Ethics Committee.

A. Reporting Procedures

For reporting issues related to the above, the email address etik@alisangroup.com and the Ethics Hotline phone number **0532 111 38 45** have been established. Direct access to these communication channels is available for sending emails and leaving voice messages.

The Ethics Hotline is solely for reporting matters that may involve abuse, and does not handle consumer complaints, suggestions, objections, etc.

Reports made through the aforementioned email address and Ethics Hotline are only accessible to the Ethics Committee of the company.

Access to these communication channels is available both internally and externally. All reports are recorded, and regular reports regarding the outcomes are sent to upper management. The Ethics Committee has the authority and responsibility to monitor the actions taken by senior management and operational units.

All reports submitted via the email address etik@alisangroup.com and the Ethics Hotline will be evaluated by the Ethics Committee, which will make the final decision regarding the consistency of the matter, the importance of the information, and the

	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

need for detailed investigation and action. Based on this decision, a ruling may be made in accordance with the Disciplinary Procedure.

B. Ethics Committee

The Ethics Committee is responsible for investigating and resolving complaints and notifications regarding violations of the ethical rules within the scope of Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy. The Ethics Committee, which reports to the Board of Directors, consists of the following positions:

Member – Director of Legal and Administrative Affairs


Member – Director of Human Resources

Member – Director & Group Manager of Internal Audit

C. Principles of Operation of the Ethics Committee

The Ethics Committee conducts its activities within the framework of the following principles:


- Keeps the identity of those submitting notifications or complaints confidential.
- Conducts investigations with the utmost confidentiality whenever possible.
- Has the authority to directly request information, documents, and evidence from the relevant department.
- The entire investigation process is documented from the outset. Information, evidence, and documents are attached to the report.
- The decisions of the Committee are immediately implemented.
- Relevant departments and authorities are informed of the results.
- While performing their duties, the chair and members of the Committee act independently of their department managers and the organizational hierarchy. They must not be subjected to pressure or influence regarding these matters.
- If deemed necessary, the Committee may consult with experts and take necessary measures to ensure confidentiality during the investigation process while benefiting from their insights.

	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

D. Primary Actions Expected to Be Reported via the Ethics Hotline

Although not limited to those listed, examples of misconduct incidents expected to be reported by employees or third parties (such as customers, suppliers, etc.) via the ethics hotline include:

- Discrimination or encouragement of discrimination among employees based on race, color, language, religion, sect, gender, nationality, age, sexual orientation, or disability.
- Subjecting employees to physical, sexual, or psychological harassment or degrading or demoralizing behavior persistently and exhaustingly; supporting or tolerating such behavior.
- Misusing one's duties or powers in exchange for personal benefits.
- Embezzling funds, goods, or valuables belonging to the company and/or clients.
- Falsifying or deliberately destroying official records, documents, or logs.
- Theft, fraud, forgery, or committing other disgraceful crimes.
- Charging personal expenses to the company, falsifying invoices related to expenses.
- Accepting gifts or personal gains through direct or indirect benefits from customers/suppliers/business partners; purchasing movable or immovable property at below-market value for personal benefit; requesting or having others promise personal benefits.
- Disclosing confidential information of the company or its clients or profiting from such information.
- Establishing open or covert business partnerships with clients/suppliers/business partners or engaging in commercial activity deemed merchant or tradesperson.
- Abusing one's duties in a way that causes financial harm or puts the company in a difficult position.
- Exceeding the authority defined by procedures, regulations, orders, and instructions and causing material losses or significant potential risks to the company.
- Intentionally failing to carry out assigned duties and instructions according to company policies for personal or third-party benefit, resulting in harm to the company.
- Taking or attempting to take confidential company information outside the company or facilitating its removal by unauthorized persons.
- Lending company cash to employees or third parties without proper record.

 Alışan Den Hartogh	Alışan Den Hartogh Chemical Cleaning and Trade Inc. Ethics Behavior Policy.	Document No:	SEÇ_EP.001
		Release Date:	16.01.2009
		Revision Date-No Tarihi-No:	17.07.2023/04
		Review Date	05.02.2025

- Conducting transactions using knowingly falsified documents.
- Weaken the company's ability to collect receivables by processing improper or incomplete transactions.
- Engaging in fraudulent activities such as tampering, imitation, sabotage, or any action that puts product safety at risk.

E. Ethics Committee Contact Information / Ethics Hotline

For your questions and notifications, you may use the following e-mail and postal addresses, or directly contact the members of the Ethics Committee.

E-mail: etik@alisangroup.com

Postal Address:

To the Attention of "Ethics Committee" or "Internal Audit Department"

Alışan Group, Değirmenyolu Street No: 28, Asia Office Park A2 Block, Floor: 1

İçerenköy – Ataşehir 34752 ISTANBUL, TURKEY

Ethics Hotline: +90 532 111 38 45

(Working hours: Weekdays 08:30–12:30 and 13:30–18:00)