

BUSINESS ETHICS AND CODE OF CONDUCT

Fompak has an enduring reputation for efficacy, integrity and fairness amongst its employees, business partners and customers, and strives meticulously to maintain this reputation.

FOMPAK'S CODES OF ETHICAL CONDUCT

ESTABLISHING AND MAINTAINING A FAIR WORKING ENVIRONMENT

Establishing and sustaining a fair working environment has long been one of Fompak's top priorities. Fompak ensures full compliance with all legislation is introduced in accordance with the United Nations Universal Declaration of Human Rights. It is our primary duty towards our employees to create a healthy and safe working environment for them. We believe that the peace at work brought about by mutual respect, tolerance and trust in business relations has a significant impact on employee loyalty and performance, and we show maximum effort to this end.

Principles

Fompak conducts all business activities in full compliance with all applicable laws and regulations of the countries in which it operates.

We also expect our employees, suppliers and contractors that we collaborate with to comply with their statutory obligations and fulfill their responsibilities.

Our Human Resources policy and practices ensure fairness in all relevant practices, including recruitment, career planning and employee development, remuneration, rewarding, and social rights and benefits.

Fompak does not tolerate any form of discrimination among its employees based on language, race, skin color, sexual orientation, religion, sect, political views, age, physical disability, or other bias.

We respect the privacy of our employees' personal life and place utmost emphasis on ensuring the confidentiality of their personal information.

We strive to establish a cooperative, positive and harmonious working environment, and ensure that the language used in written and verbal business correspondence in business affairs includes motivational direction and courtesy.

Fompak's business ethics and code of conduct does not condone any form of violation of employee integrity and rights, and cases of harassment (physical, sexual or psychological), mobbing or bullying in the workplace are not tolerated under any circumstances.

We ensure full compliance with Occupational Health & Safety in order to ensure a healthy and safe working environment and conditions for all employees.

Fompak does not employ or condone any form of child labor.

CONFIDENTIALITY

Fompak regards as confidential all information on processes performed by its employees, including but not limited to company financials, proprietary and intellectual rights, product and process design and development, innovations, inventions and patents, as well as business strategies, confidentiality agreements with business partners and customers, process performance data and private information on its employees, regardless of the media in which the information is stored (print, non-print, visual, audio, etc.).

Fompak's attention to confidentiality also applies to customer properties (information, technologies, etc.).

Principles

It is the joint responsibility of employees to use information effectively, share it in a correct manner, and to ensure its confidentiality, integrity and accessibility.

Knowledge and information are used only in accordance with the scope of duty and responsibility, and shall not be modified, copied or disclosed to third parties.

Suppliers and business partners are obligated to sign confidentiality agreements before being disclosed any information deemed confidential by the company.

Formal requests from authorities are not disclosed to third parties unless such disclosure constitutes a statutory obligation.

Information classified as confidential under the scope specified above are not discussed in public areas such as corridors, dining halls, elevators and passenger shuttles in which ensuring complete privacy is unfeasible.

All employee personal information is kept confidential. All employee correspondence is handled through personal notifications. Employees cannot pressure their peers into disclosing personal information.

Fompak does not tolerate office gossip, slander and defamation of any kind that may harm the reputation of individuals and organizations.

GIVING AND ACCEPTING GIFTS

Fompak does not condone acceptance of any gifts and benefits, either tangible or intangible, that may influence employee decision and attitude in business dealings and impair objectivity.

Accordingly, the company prohibits employees from giving gifts using company resources and leveraging their position and authority in the company for benefit.

Principles

Under the principles of professionalism and courtesy;

Employees may give and accept gifts, such as dinners, provided that such gifts fall within acceptable business standards.

Our employees may accept symbolic, non-cash gifts, such as plaques and shields from seminars, symposiums, congresses and similar organizations organized by universities and NGOs.

Giving, accepting or soliciting bribes or commissions with the implication of an expectation of a return or benefit is not tolerated under any circumstances.

Gifts and promotional materials that may be offered as part of business dealings are subject to the senior management's approval.

Such gifts must be in accord with social and cultural sensitivities.

Under the scope of our social responsibilities, participation in fundraising efforts by global organizations, foundations and institutions is subject to the approval of the senior management.

MANAGEMENT OF CONFLICTS OF INTEREST

In all its business dealings, Fompak exercises due care in avoiding actions and behaviors that may lead to a conflict of interest.

Conflict of interest refers to any situation that affects or may affect the impartiality of employees in exercising their duties through the promise of tangible or intangible benefits to themselves, their relatives, associates, or individuals and organizations with whom they are associated.

Principles

Fompok employees are prohibited from using the company's resources, reputation, authority or power for personal benefit.

Employees are required to avoid using their business relations for personal benefit, and establishing relationships with suppliers and/or other business partners with the purpose of financial gains.

With prior knowledge and permission of the management, employees may work in their out-of-office hours in other jobs for financial gain and/or other benefits, provided that the job in question is not in violation of the legal, social and cultural sensitivities of Fompok, do not harm the reputation of Fompok or negatively affect the employee's performance in Fompok.

Also with permission of the management, employees may participate in non-profit organizations, social responsibility and charity efforts, NGOs, sports associations or universities, as long as these efforts do not affect the employee's performance in Fompok.

Employees are prohibited from engaging in political activities during working hours inside the workplace or any other locations deemed as part of the workplace, or taking up their peers' time through such activities. Managers cannot ask their subordinates to join a particular political organization.

Employees who wish to take part in a political activity may only do so with prior knowledge of senior management, and upon approval of the Ethics Committee.

UTILIZATION OF RESOURCES

Ensuring that company resources are used in accordance with the principle of saving to prevent undue waste and loss is one of the basic responsibilities of all Fompok employees.

Principles

Fompok employees manage and preserve all financial, technological and information resources, assets and any natural resources and energy with a view to savings.

With the understanding that time constitutes a resource as well, Fompok employees do not spend their time on personal errands or accept personal visitors during office hours except for cases where it is unavoidable.

OUR RESPONSIBILITIES

GLOBAL RESPONSIBILITY

In accordance with the principles set forth in the United Nations Global Compact, Fompok is committed to act for the benefit of the country and the world, and ensure that its employees and suppliers act accordingly.

RESPONSIBILITIES OF EMPLOYEES

It is the primary responsibility of all Fompak employees to observe business ethics and codes of conduct.

Within this context, all employees are responsible for;

Always acting in full compliance with the laws,

Knowing and embracing the business ethics and code of conduct of Fompak, and reflecting them in their business dealings,

Promptly notifying their supervisor and/or the Ethics Committee, either anonymously or not, of any actual or potential violation as they become aware of it,

Providing assistance in Ethics Committee enquiries as required, with due diligence to the principle of confidentiality.

RESPONSIBILITIES OF MANAGERS

Fompak managers are responsible for acting as role models to establish and sustain a corporate culture and working environment that promotes the rules of ethics, organizing and supporting training activities to increase employee awareness in this regard, and encouraging employees to notify the Ethics Committee in case of a potential violation.

IDENTIFICATION OF UNETHICAL CASES AND CONDUCT

Please ask yourself the following questions in order to determine whether the situation or behavior you face during your work is ethical or not:

- Are you aware of any business activity involving Fompak, its business partners, suppliers and contractors that may represent a violation of laws and Fompak's business ethics?
- With regard to the event you witnessed or experienced, or the task asked of you:
 - How would it affect your reputation if your family, colleagues or supervisors were aware of it?
 - How would it affect the reputation of your colleagues, your employer, or customers?
 - How would it be described on the media?
 - Would it make your spouse, siblings or children uncomfortable?
 - Can it be described as a violation of privacy (physical, sexual or emotional)?
- Are you trying to make a decision, but having doubts as to how you should proceed in accordance with the code of conduct?

ETHICS COMMITTEE

Fompak Ethics Committee is tasked with investigating and resolving cases of code of conduct and business ethics violations. The Ethics Committee operates under the Chairman of the Board, and it is structured as such:

Chair

Member

Member

The Ethics Committee handles all reports and the investigation by exercising due diligence in maintaining confidentiality. Proper written documentation are kept for the investigation process itself and statements taken. The reports are handled as fast as possible before commencing with the investigation process. Wherever necessary, the committee may ask for expert opinion on legal, social and medical matters.

Once the investigation has been completed, and upon approval of the management, the Ethics Committee takes one or several actions within limits determined by law.

CONTACT

Use the e-mail address below or contact the Ethics Committee members directly for your inquiries and reports.

E-mail: etik@fompak.com