

## BUSINESS ETHICS

We believe that a strong corporate governance is only possible through a strong ethical foundation. Our Company upholds all anti-bribery and corruption laws and regulations in the countries where we operate and are represented. We observe ethical and professional principles, and universal rules of law, in particular, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, transparently and with integrity in all our relationships and business dealings. As a result of the importance we attribute to this issue, we drew up our Anti-Bribery and Corruption Policy and publicly declared it on the Holding's website.

As Global Investment Holdings (GIH), our Anti-Bribery and Corruption Policy includes the principles, practices, supervision and reporting methods regarding compliance with the laws and regulations on bribery, corruption and facilitation payments, political donations, hospitality costs and gifts. Anti-Bribery and Corruption Policy is intended to provide a comprehensive description of our approach to bribery and corruption among GIH and all its subsidiaries.

In addition, our Group Company, serving in the port operating business line, GPH's, has its own Code of Ethics and Modern Slavery Statement which are accessible on its corporate website (<https://www.globalportsholding.com>).

We expect all our stakeholders, and especially our employees to embrace this approach and to act within the framework of our Code of Ethics and Anti-Bribery and Corruption Policy.

The Board of Directors is responsible for approving the Policy, along with supervising the determining and operating notifications, examinations, and enforcement mechanisms for noncompliance of rules and regulations. Senior Management is responsible for preparing, developing, executing and updating the Policy.

Our Policy is reviewed every year and when deemed necessary amended and circulated among the company employees. The Audit Committee, consisting of independent members, is responsible for this review. The Corporate Governance Committee is responsible for regularly reviewing the Company's Anti-Bribery and Anti-Corruption Policy and developing the policy content. The committee is also responsible for regularly monitoring practices, including those with bribery and corruption, and conducting risk assessments on an annual basis.

In case of the violation of the Anti-Bribery and Corruption Policy, disciplinary penalties that may extend to the termination of the employment contract can be applied. Moreover, our Group companies commit to show zero tolerance to bribery and corruption and avoid making business with organizations known to be involved in such acts.

We offer training to concerned parties on anti-bribery and corruption issues so that these parties may acquire information on the Policy's principles and internalize them. These parties include all Company employees, contractors, suppliers, agencies and joint ventures. Periodically, we conduct training and awareness programs for employees regarding legal requirements under the anti-bribery and anti-corruption program.

All notifications about ethical rules, anti-bribery and anti-corruption can be sent to the Holding via the ethics line and the e-mail address below. In 2021, 3 reports/incidents were reported to the ethics hotline. The reports received were investigated and concluded that they were not related to our company. Therefore, they were closed.

The anti-bribery and anti-corruption reporting e-mail hotline: [etik@global.com.tr](mailto:etik@global.com.tr)