



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	1/17

### REVISION DATA

REV. NO	DATE OF REVISION	REVISION DESCRIPTION
00	20.11.2014	First Publication
01	24.04.2015	Basis Section is added. "within the scope of 3.3 Operating Control ( Module A) . "
02	03.11.2021	The title of "Our Responsibilities Towards Society and Humanity" has been detailed.

#### BASIS :

- "Regulation on the Prevention of Major Industrial Accidents and Mitigation of Their Effects" published in the Official Gazette dated 2/3/2019 and numbered 30702 (Repeated) - Annex-3
- "Notification on Safety Report to be Prepared Regarding Major Industrial Accidents" published in the Official Gazette dated 19/4/2019 and numbered 30750 (Repeated) - Annex-2

PREPARED BY	APPROVED BY
PERSONNE, PURCHASING AND SECURITY MANAGER	GENERAL MANAGER

ALTINTEL LİMAN VE TERMİNAL İŞLETMELERİ A.Ş.

		<b>CODE OF BUSINESS ETHICS</b>		
<b>DOCUMENT NO</b>	<b>DATE OF ISSUE</b>	<b>REVISION NO</b>	<b>DATE OF REVISION</b>	<b>PAGE</b>
KYS-P-10	20.11.2014	02	03.11.2021	2/17

## CODES OF BUSINESS ETHICS

### I. OUR CODES OF BUSINESS ETHICS

#### A. Honesty

Accuracy and honesty are our primary values in all our business processes and relationships. We act with integrity and honesty in our relations with our employees and all our stakeholders.

#### B. Privacy

Confidential and proprietary information includes information about Altintel Liman and Terminal İşletmeleri that may create a competitive disadvantage, trade secrets, financial and other information that has not yet been disclosed to the public, information on personnel rights, and information within the framework of "confidentiality agreements" concluded with third parties.

As Altintel employees, we care the privacy and the protection of private information of our customers, employees and other relevant persons and organizations we work with. We protect confidential information about our company's activities, we use this information only for ALTINTEL's purposes. We share this information with the relevant persons only within the limits of the powers specified.

It is absolutely unacceptable for us to gain any commercial interest by leaking any confidential information belonging to Altintel. When leaving our company, we do not let out confidential information and documents, projects, regulations and similar works that we possess due to our duties.

#### C. Conflict of Interest

As ALTINTEL employees, we aim to avoid conflicts of interest. By taking advantage of our current position, we do not derive personal benefits from individuals and organizations with whom we have business relations, personally, through our family or relatives. Outside ALTINTEL, we do not engage in business activities based on additional financial interests without the approval of senior management. We refrain from using ALTINTEL name, power and our identity for personal benefit.

In the event of a potential conflict of interest, we apply these methods when we believe that the interests of relevant parties can be safely protected through legal and ethical methods. When in doubt, we consult our manager or the Ethics Committee.



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	3/17

### D. Our Responsibilities

In addition to our legal responsibilities, we take care to fulfill our responsibilities listed below towards our customers, employees, shareholders, suppliers and business partners, our competitors, society, humanity and ALTINTEL.

#### 1. Our Legal Responsibilities

We carry out all our current activities and transactions at home and abroad within the framework of the laws of the Republic of Turkey and international law, and provide accurate, complete, and understandable information to legal regulatory institutions and organizations in a timely manner.

While carrying out all our activities and transactions, we are at an equal distance to all kinds of public institutions and organizations, administrative constitutions, non-governmental organizations, and political parties without any expectation of benefit, and we fulfill our obligations with this sense of responsibility.

#### 2. Our Responsibilities Towards Our Customers

We work with a proactive approach focused on customer satisfaction, responding to the needs and demands of our customers in the shortest time and in the most appropriate style. We deliver our services on time and under the conditions we promised, and we approach our customers within the framework of respect, honor, justice, equality, and etiquette.

#### 3. Our Responsibilities Towards Employees

We ensure that employees' personal rights are fully and correctly used. We approach our employees honestly and fairly, and commit to a non-discriminatory, safe, and healthy working environment. We make the necessary effort for the personal development of our employees, support them in volunteering for appropriate social activities with the awareness of social responsibility, and observe the balance between business life and private life.

#### 4. Our Responsibilities Towards Our Partners

By giving priority to the continuity of ALTINTEL and in line with the goal of creating value for our partners, we avoid taking unnecessary or unmanageable risks and aim for sustainable profitability. We act within the framework of financial discipline and accountability, and we manage our company's resources and assets, as well as our working time, with an awareness of efficiency and savings. We care for increasing our competitiveness and investing in areas that have growth potential and that will provide the highest return on the connected resource. In our public statements and to our shareholders, we provide timely, accurate, complete, and comprehensible information about our financial statements, strategies, investments and risk profile.



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	4/17

### 5. Our Responsibilities Towards Our Suppliers/Business Partners

We act fairly and respectfully as expected from a good customer and show due diligence to fulfill our obligations on time. We carefully protect the confidential information of our business partners and the people and organizations we do business with.

### 6. Our Responsibilities Towards Our Competitors

We compete effectively only in areas that are legal and ethical and avoid unfair competition.

We support the efforts to ensure the targeted competitive structure within the society.

### 7. Our Responsibilities Towards Society and Humanity

The protection of democracy, human rights and the environment, education and charity, the elimination of crime and corruption are very important to us. With the awareness of being a good citizen, we act sensitively as a pioneer in social issues. We try to take a role in non-governmental organizations, public interest services, and appropriate activities on these issues. We act sensitively on the traditions and cultures of Turkey and the countries where we carry out international projects. We do not give or accept bribes or gifts and similar products and services at an excessive price.

We act in accordance with the Labor Law and the International Labor Organization (ILO) agreements, to which the Republic of Turkey is a party, on the issue of not employing child labor. We also ensure that our suppliers comply with the aforementioned legislation. We strive to ensure that our working hours do not exceed the limits stipulated by the law so that our employees can spare time for their private lives as well. We reimburse our employees for all work considered overtime as wages or additional leave entitlements according to the legislation. It is not allowed to make or develop an application that will cause forced labor within the organization and in any of its suppliers. We ensure that working conditions are in line with relevant laws and best practices.

Altintel Terminal Liman does not accept the employment of child labor within the institution and all other business partners and suppliers. It rejects all forms of discrimination in recruitment and placement and business activity processes. No one can be subjected to discrimination due to gender, race, religion, language and other material and moral differences.

### 8. Our Responsibilities to the Environment

We take as many measures as possible in work areas and daily activities to minimize negative impacts on the environment. We arrange training programs to increase the awareness of our company employees on this issue.

	<b>CODE OF BUSINESS ETHICS</b>			
<b>DOCUMENT NO</b>	<b>DATE OF ISSUE</b>	<b>REVISION NO</b>	<b>DATE OF REVISION</b>	<b>PAGE</b>
KYS-P-10	20.11.2014	02	03.11.2021	5/17

**9. Our Responsibilities Towards "ALTINTEL" Name**

Our business partners, customers and other stakeholders trust us with our professional competence and integrity. We try to keep this reputation at the highest level.

We offer our services within the framework of Company policies, professional standards, commitments, and ethical rules and show the necessary dedication to fulfill our obligations.

We care for providing services in areas where we believe we are and will be professionally competent and we aim to work with customers, business partners and employees who meet the criteria of accuracy and legitimacy. We do not work with those who harm the morality of the society, harm the environment and public health.

We express only our company's views, not ours, in public and in areas where the audience thinks we are speaking on behalf of our Company.

When we encounter complex situations that may put ALTINTEL at risk, we first consult with appropriate personnel by following appropriate technical and administrative consultation procedures.

**II. POLICIES SUPPORTING BUSINESS ETHICS**

**A. Conflict of Interest Policy**

It is essential that company employees stay away from situations that may create a conflict of interest. It is among the most important responsibilities of all employees that the company's resources, name, identity, and power are not used for personal benefit, and avoid situations that may adversely affect the name and reputation of the organization. The following principles of practice determine the situations of conflict of interest and the principles to be applied in such situations that Company employees may encounter in their private lives while performing their duties or due to their business relationships.

**Code of Practice**

**1. Activities That May Create Conflict of Interest**

All Company employees are required to fully comply with the principles presented and the situations listed below as activities that may create a conflict of interest. The company does the necessary work to encourage its employees to comply with these principles.

**i. Engaging in Activities That May Create a Conflict of Interest**

Employees do not enter into a business relationship that provides mutual or nonreciprocal benefits with their family members, friends or other third parties in any way. For example, an employee with purchasing authority should avoid doing business with a supplier where a family member works.



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	6/17

Exceptional cases are subject to the knowledge and approval of the Company's Senior Management. In that vein, Company employees should also be careful about conflicts of interest that may arise due to their close family members working for competitor company.

Employees cannot gain any commercial interest by leaking any information about the Company from inside, and cannot lead others to gain benefits.

It is essential that ALTINTEL employees do not work directly or indirectly in any work that requires them to be considered as "tradesmen" or "craftsmen", and not to work for another person and/or institution, under any name whatsoever, during or outside working hours, in return for a wage or similar benefit. **However, the fact that the employees work for another person (family member, friend, other third parties) and/or the institution outside of working hours in return for a wage or similar benefit is possible:**

- **Unless it creates a conflict of interest with their duties and practices in the company**
- **Unless it creates inconveniences with other business ethics rules and policies supporting these rules**
- **Unless it adversely affects their ability to continue their duties in the company**
- **With management approval**

For the General Manager and all positions reporting to the General Manager, it is given by the General Manager of ALTINTEL with the opinion of the Ethics Committee, following the opinion of the manager to whom she is affiliated. For other employees, it is given by the company's General Manager with the opinion of the company's Code of Ethics Advisor, the company's Administrative Affairs and Human Resources Manager.

Altintel employees cannot work in competitor or companies with which the Company has business relations. They can work in non-profit organizations and universities in social responsibility and charitable roles with the approval of the management provided that they do not disrupt their duties within the Company.

Managers who are in a position to make a hiring decision cannot hire their spouses, close relatives and relatives of these people.

Employees can make speeches and write professional articles on subjects that are not related to the company and its activities and are not contrary to its policies. In order to use the Company name in these activities, approval from the top management is required.

Employees of companies can be active in any political party, individually and voluntarily. Managers cannot ask their employees to do political work or join a party. It is possible for the employees to take part in any political party under the following conditions:



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	7/17

- Employees taking part in any political activity should not create a conflict of interest with their duties in the company and ALTINTEL's practices and approaches.
- Employees cannot engage in any political activities during working hours and cannot take the time of their colleagues regarding these activities.
- Employees cannot use the company name, position, title and company resources during their political activities.

Employees may make personal financial or moral aid and/or donations to third parties outside the Company, and may take part in charitable organizations.

### ii. Misconduct

**It is unacceptable for the employees to harm the Company by using their powers for the benefit of themselves and/or their relatives and without the care expected from them.**

Employees cannot directly or indirectly derive personal gain from the purchasing and sales activities of the Company and from all transactions and contracts to which it is a party.

Employees may not engage in acts and behaviors contrary to ethics, law, and Company discipline.

### iii. Use of Resources

In the use of resources on behalf of the company, the interests of the company are taken into account. Company assets, facilities and personnel cannot be used outside of the Company under any name and for anyone's benefit, without the benefit of the Company. The principle of "saving in all matters" is applied by all personnel.

The right use of resources for the benefit of the Company also requires the right use of time. Company employees use their time well during business hours and do not spare time for their private work during business hours. Managers cannot assign employees for their personal work.

It is essential that private visitors are not accepted during working hours. Employees are required to complete the appointments for compulsory visitors in a reasonable time in connection with the subject of the visit and in a way that does not hinder the workflow.

### iv. Relations with Other Persons and/or Organizations with which the Company Has a Commercial Relationship



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	8/17

Private business relations cannot be established with the Company's customers, subcontractors or suppliers and other persons and/or organizations with which the Company has commercial relations. No personal loan and/or goods/services can be taken. Loan money and/or goods/services cannot be given to other persons and/or organizations with which the company has commercial relations.

The following points are taken into consideration in relations with customers: Even in favor of the customer, a transaction cannot be made without the knowledge of the customer, and even if it is in favor of the company, the customer's weaknesses cannot be exploited, and the customer cannot be profited by giving incomplete or incorrect information.

Company personnel may not request or imply gifts from other persons and/or organizations with whom the Company has commercial relations. No gifts, money, checks, property, free vacations, exclusive discounts or similar are accepted that will put the company under liability. Personal aid and donations cannot be accepted from any person or organization that has a business relationship with the Company. The Policy of Accepting and Giving Gifts is applied in relation to the subject.

### v. Media Relations

Making a statement to any broadcasting organization, making an interview, participating in seminars-conferences and similar places as a speaker depends on the approval of the company's senior management. No personal gain can be obtained from these activities.

### vi. Representing the Company

All kinds of fees that will accrue due to the duties performed in all kinds of associations, employers' unions and similar non-governmental organizations representing the company are donated to the relevant institution or the channels indicated by the relevant institution.

Payments made by third parties to the Company employee as seminar speaker fee or in return for a similar service are similarly donated to the relevant institution or channels indicated by the institution. Except money, these people may receive awards, plaques and similar gifts that are given as a memory of the day and have symbolic value.

## B. Policy for Accepting and Giving Gifts

It is essential that the company and its employees do not accept gifts or benefits that may affect their impartiality, decisions, and behaviors, and do not attempt to provide gifts and benefits to third parties that may have such effects. The application principles defined below regulate the gift exchanges that the

		<b>CODE OF BUSINESS ETHICS</b>		
<b>DOCUMENT NO</b>	<b>DATE OF ISSUE</b>	<b>REVISION NO</b>	<b>DATE OF REVISION</b>	<b>PAGE</b>
KYS-P-10	20.11.2014	02	03.11.2021	9/17

Company employees may have with third parties and organizations with which they have business relations and determine the principles to be applied in this regard.

### Code of Practice

1. Company employees are prohibited from receiving all kinds of benefits and gifts, whether they have economic value or not, that affect or may affect their impartiality, performance and decision-making while performing their duties.
2. Company employees may receive and/or give the gifts.
  - Compatible with the corporate business objectives,
  - Compliant with applicable legislation and
  - Outlined in Article 3 or may agree to be subject to a special application, provided that the public's knowledge of the gift will not put the Company in a difficult position.
3. Provided that it complies with the conditions specified in article 2.
  - Company employees, with the approval of the General Manager, can give and receive entertainment, treats and meals at acceptable standards in the business world.
  - In seminars and similar organizations attended on behalf of the company, awards, plaques and similar gifts with symbolic value can be received as a memory of the day except money.
4. Provided that the above-mentioned conditions and gifts other than money, benefits, holidays, discounts and similar conditions are in accordance with the conditions listed in article 2, and if the total value of the gifts received is less than 250 TL for each calendar year and the person/institution giving the gift separately, no approval is required.
5. It is forbidden to receive gifts or benefits that are implicitly or explicitly tied to a compensation.
6. Receiving, giving, or offering bribes and/or commissions is unacceptable under any circumstances.
7. It is forbidden for company employees to accept unrequited or borrowed money from subcontractors, suppliers, consultants, competitors, or customers, to cover travel expenses, event expenses and similar payments without the approval of the General Manager.
8. The company's senior management approves what the gifts and promotional materials to be given by the company to customers, dealers and other third parties with whom it has business relations are. No separate authorization is required for the distribution of approved gifts and promotional materials.
9. The Company may accept suitable products and services as gifts, provided that they comply with the conditions listed in clause 2 and, within the knowledge and approval of the Company's senior management, products or services that are suitable for the buyer's culture and ethical values may be given as gifts.



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	10/17

10. In exceptional cases where local cultural values require mutual gifts above the values determined in the company policy, these gifts can only be accepted on behalf of the Company and with the approval of the Company's senior management. In any case, the gift exchange should be done in accordance with the local culture.

### C. Confidential Information Protection Policy

Information is one of the most important assets that the Company will use to make its vision come true. In this direction, it is the joint responsibility of our company and employees to use information effectively, to share it correctly, and to ensure the confidentiality, honesty, and accessibility of information in this process. It is important for ALTINTEL to achieve the highest level of benefit that the management systems established and the processes implemented for the management and confidentiality of information in our company are in harmony with each other. Details of the practices related to the subject are included in the ARKEM Information Security Policy and related documents. The following principles of practice define confidential information for the Company and regulate the principles that employees must comply with regarding confidential information.

#### Code of Practice

Provided that confidential information is not limited to these, the Company's trademark and similar intellectual property rights cover the database written, found, developed, made or put into practice by the personnel, including all kinds of innovations, printed communication materials, processes, advertising, product packaging and labels and plans (marketing, product, technical), business strategies, strategic partnerships and information on partners, financial information, personnel information, customer lists, product designs, know-how, specifications, identity of potential and real customers, information about suppliers and any similar written, graphic or machine-readable information.

The principles to be followed regarding confidential information are listed below:

1. This information cannot be disclosed to third parties unless disclosure is required in accordance with Official Authorities and Legislation.
2. This information cannot be changed, copied or destroyed. Necessary measures are taken to ensure that information is carefully kept, stored and not disclosed. Changes on information are recorded along with its date.
3. Confidential files cannot be taken out of the institution. For confidential information that needs to be taken out of the institution, the approval of the information officer or senior management must be obtained.
4. Passwords, user codes and similar identifying information used to access company information are kept confidential and not disclosed to anyone other than authorized users.
5. Company confidential information is not spoken in public places such as dining halls, cafeterias, elevators, service cars and similar places.



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	11/17

6. Confidential information is classified according to their degree of confidentiality, and clearly stated in the content of this information. Company personnel know the degree of confidentiality of the information they obtain due to their duties and act in accordance with this confidentiality. When there is hesitation in terms of confidentiality, a higher confidentiality class is acted upon and the relevant manager's opinion is sought when necessary.
7. In case of sharing information with third parties and/or organizations for the benefit of the Company, a confidentiality agreement is signed for information sharing or a written confidentiality commitment is obtained from the other party in order to ensure that the responsibilities of these individuals and organizations regarding the security and protection of the shared information are understood.
8. Ungrounded statements and/or gossip about persons or institutions cannot be made.
9. The wages, side benefits and similar personal information of the personnel, which reflect the company policy and are personal, are confidential and cannot be disclosed to anyone other than the authorities. The information about the personnel is sent to the person privately. It is strictly forbidden for the personnel to disclose this information to others or to pressure other employees to disclose the information.

### D. Policy of Establishing and Maintaining a Fair Working Environment

The company considers the creation and maintenance of a fair working environment for its employees as one of its top priorities. It is aimed to increase the success, development and loyalty of employees by creating a fair, respectful, healthy and safe working environment that is compatible with all relevant laws and regulations. The following codes of practice set out the basic principles for establishing and maintaining a fair working environment in the Company.

#### Codes of Practice

1. Company practices comply with all applicable laws and regulations regarding employment and working life. Company employees also fulfill all legal requirements within the framework of their activities and act in accordance with legal regulations.
2. Altintel human resources policies and practices ensure that all other practices such as recruitment, promotion-transfer-rotation, remuneration, rewarding, social rights and similar are fair.
3. It is unacceptable to discriminate among employees within the organization based on language, race, color, gender, political opinion, belief, religion, sect, age, physical disability and similar reasons.
4. By creating a positive and harmonious working environment that supports cooperation in the company and preventing conflict environments, it is ensured that people with different beliefs, thoughts and opinions work in harmony.
5. Employees' private lives and personal boundaries are respected.
  - Communications between persons cannot be violated by non-parties.



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	12/17

- It is forbidden to unlawfully transfer/disseminate/capture personal data to others, even if it is recorded in accordance with the law.
  - Personal information of the personnel arising from the nature of the business relationship in the workplaces, and which may be required in the continuation is not misapplied and is not shared with third parties without the consent of the persons.
  - The private and family life of all employees is respected.
6. In addition to all kinds of immunities of employees, physical, sexual and emotional immunities are also observed.
- Violating the immunity of employees in any way through physical, sexual and/or emotional harassment in the workplace or any place where they are due to work is against the law and ethical rules and this crime is not tolerated by the Company in any way. The purpose of this application is to ensure that employees work in a work environment where their physical, sexual and emotional immunity is protected.
  - Violation of a person's body immunity by sexual behavior and/or sexual harassment without physical contact is defined as sexual harassment. According to this, any behavior that can be considered within this definition is prohibited.
  - In addition, those who make a complaint or report about any harassment or who act negatively towards those who assist during the investigation are not tolerated in the same way.
7. No employee can demand privileged treatment due to different gender, religion, language or race, cannot give privileges to anyone and cannot be subjected to a special application. It is unacceptable to make or gain concessions by taking advantage of differences such as gender, religion, language, race.
8. It is ensured that the physical working environment and conditions of the workplace are healthy and safe for all employees.

### III. LEGISLATION TO BE APPLIED

Since ALTINTEL operates in international markets, company operations may be subject to different country laws and regulations. When question marks arise regarding the ethics of doing business in different countries, the regulations established in the country where the work is done should be followed first. If the monitoring of the regulations in the country and/or countries where the work will be carried out is of such a nature that it may create objectionable results in terms of the ethical values adopted by Altintel, which will operate on the international platform, then we should try to find solutions within the ethical rules and procedures we have.

### IV. EMPLOYEE RESPONSIBILITIES

	<b>CODE OF BUSINESS ETHICS</b>			
<b>DOCUMENT NO</b>	<b>DATE OF ISSUE</b>	<b>REVISION NO</b>	<b>DATE OF REVISION</b>	<b>PAGE</b>
KYS-P-10	20.11.2014	02	03.11.2021	13/17

ALTINTEL has determined in detail the ethical rules on Ethics and related policies and procedures, how we should behave and how we should do our job. Compliance with these rules is the primary responsibility of all employees. In this direction, all employees have the responsibility to;

- Act in accordance with laws and regulations in all circumstances,
- Read the Altintel Code of Business Ethics, know, understand, internalize, and act in accordance with the rules, principles and values in it,
- Learning the general and business-specific policies and procedures valid in the company,
- Consult with manager and human resources about potential violations related to himself or others,
- Promptly report potential violations of self or others; to convey their notifications on these issues, either verbally or written, to their manager, administrative affairs and human resources and/or the Ethics Committee by their names or anonymously,
- Follow the "Paths and Methods to be Followed While Making Ethical Decisions", which is defined in order to assist in acting in accordance with the rules and in solving problems,
- Cooperate with the Ethics Committee in ethical investigations and to keep the information related to the investigation confidential.

**A. Ways and Methods to Be Followed While Making Ethical Decisions**

You should follow the steps below to guide you in deciding on an action plan and ask yourself these questions:

**1. Identifying the Event, Decision or Problem**

- Have you been asked to do something that you think might be wrong?
- Are you aware of a potentially illegal or unethical business situation in the company or your business partners?
- Are you trying to make a decision and have doubts about how to act in accordance with business ethics?

**2. Think Before You Decide**

- Try to clearly define and summarize the problem or question
- Ask yourself why there is a dilemma
- Consider options and consequences
- Consider who might be affected
- Consult others



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	14/17

### 3. Decide on an Action Plan

- Identify your responsibilities
- Review all relevant facts and information
- Consult appropriate company policies, procedures, and professional standards
- Assess risks and think about how you can reduce them
- Try to create the best action plan
- Consult others

### 4. Test Your Judgment

- Review questions that should be asked from an ethical perspective
- Review your decisions within the framework of the company's core values
- Make sure you consider company policies, laws, and professional standards.
- Consult others and consider their views within your planned action plan.

### 5. Proceed with Determination

- Share your decision with the relevant people along with your reasons
- Share what you have learned
- Share your success story with others

#### B. 4 Essential Questions to Consider

1. Is this activity/behavior in compliance with laws, rules, and traditions? (Standards)
  - Does it meet professional standards?
  - Is it legal?
2. Is this activity/behavior balanced and fair? Would we be offended if the competitor firm (someone else) did it? (Sense of justice)
  - Is it true for you?
3. Would our company and stakeholders be offended if all the details of this event were made public? (Feelings and ethical values)
  - Would you be in a difficult situation or embarrassed if others knew that you were behaving in this way?
  - Could it have negative consequences for you or your Company?



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	15/17

- Who else might be affected (other employees within the company, you, shareholders, etc.)?

#### 4. To what extent does "perceived truth" coincide with "objective truth"?

- How would it be reflected in the newspapers?
- What would a reasonable person think in the same circumstances?

### V. RESPONSIBILITIES OF MANAGERS

Altintel managers have additional responsibilities beyond the responsibilities defined for employees within the framework of ALTINTEL-ETHICS. Accordingly, managers are responsible for:

- Ensuring that a corporate culture and work environment that supports the Code of Ethics is established and maintained,
- Setting an example for the implementation of ethical rules and training their employees on ethical rules.,
- Supporting their employees in submitting their questions, complaints, and notifications regarding the Code of Ethics,
- Guiding on what to do when consulted, taking into account all notifications and conveying them to the Ethics Committee as soon as it deems necessary,
- Ensuring that the business processes under their responsibility are structured in a way that minimizes the risks related to ethical issues and to implement the necessary methods and approaches to ensure compliance with ethical rules.

### VI. RESPONSIBILITIES OF ETHICS ADVISORS

Code of Ethics Advisors are responsible for

- Guiding and advising on questions and issues raised by employees on ethics within the Company,
- Directing the non-compliances that cannot be resolved within the Company or whose resolution requires investigation, to the Ethics Committee,
- Contributing to the resolution of internal ethical non-compliances which they receive upon the request of the Ethics Committee,
- Reporting ethical questions and nonconformities to the Ethics Committee regularly or when requested, together with the results,
- Being the contact person from the company in the investigations of the Ethics Committee and providing the necessary support to the investigations,
- Following, monitoring, and supporting the effectiveness of ALTINTEL-ETHICS practices carried out in the Company.

		<b>CODE OF BUSINESS ETHICS</b>		
<b>DOCUMENT NO</b>	<b>DATE OF ISSUE</b>	<b>REVISION NO</b>	<b>DATE OF REVISION</b>	<b>PAGE</b>
KYS-P-10	20.11.2014	02	03.11.2021	16/17

## VII. OTHER RESPONSIBILITIES

- Company senior management is responsible for the effective implementation of ALTINTEL-ETHICS or the Code of Business Ethics specific to their company which they may create within this framework and the creation of a culture in which this is supported
- The Code of Business Ethics and all relevant policies are reviewed, revised and documented by the Personnel, Purchasing and Security Department Manager with the recommendations of the Ethics Committee and announced to the company with the approval of the General Manager.
- Company Administrative Affairs and Human Resources is responsible for all employees to:
- Inform the employees about the Code of Ethics, provide trainings in certain periods in order to ensure the clarity of the policy and rules, and ensure the continuous communication of this issue with the employee,
- Ensure that those who are employed in the company read the code of ethics, be informed about it and sign the Business Ethics notification document regarding what they have read,
- Read and sign the Code of Ethics.

### **Company management in cooperation with the Ethics Committee is responsible for;**

- Ensuring the confidentiality of complaints and notifications made within the framework of the Code of Ethics and protecting individuals after their notifications,
- Ensuring the occupational safety of the reporting employees,
- Ensuring that complaints and notifications are investigated in a timely, fair, consistent and sensitive manner and taking the necessary actions decisively as a result of violations.

## VIII. ANALYSIS OF NON-COMPLIANCE WITH THE CODE OF ETHICS

Those who violate the Code of Business Ethics or Company policies and procedures will be subject to various disciplinary sanctions, up to the level of being asked to leave the job if necessary. Disciplinary sanctions will also be applied to those who approve or direct the inappropriate behavior and actions that cause breaking the rules, or who have knowledge of these issues and do not make the necessary notification properly.

### A. Ethics Committee

The Ethics Committee is responsible for investigating and resolving complaints and notifications regarding violations of ethical rules within the scope of Altintel Liman ve Terminal İşletmeleri A.Ş. Code of Business Ethics (ALTINTEL-ETHICS). Working under the Altintel General Manager, the Ethics Committee consists of people in the following positions:



## CODE OF BUSINESS ETHICS

DOCUMENT NO	DATE OF ISSUE	REVISION NO	DATE OF REVISION	PAGE
KYS-P-10	20.11.2014	02	03.11.2021	17/17

Chairman - General Manager

Member – HSE and Quality Manager (Ethics Rule Advisor)

Member – Personnel, Purchasing and Security Manager (Ethics Rule Advisor)

### B. Working Principles of the Ethics Committee

The Ethics Committee carries out its work within the framework of the principles set out below:

- Keeps the identity of those who make notifications or complaints, along with notifications and complaints, confidential.
- Conducts the investigation as confidentially as possible.
- Has the authority to request information, documents and evidence related to the investigation directly from the unit available. It can examine all kinds of information and documents which it has obtained only limited to the subject of investigation.
- The investigation process is written down from the beginning. Information, evidence and documents are attached to the report.
- The official report is signed by the chairman and members.
- The investigation is handled promptly, and the result is reached as quickly as possible.
- Decisions taken by the Committee are put into effect immediately.
- The relevant departments and authorities are informed about the result.
- The chairman and members of the Committee act independently and unaffected by the department managers and the hierarchy within the organization while performing their duties on this issue. They cannot be pressured or indoctrinated on the subject.
- If the Board deems it necessary, it may seek expert opinion and benefit from experts by taking measures that will not violate the principles of confidentiality during the investigation.