# SUPPLIER CODE OF CONDUCT

* 1. **Introduction**

The Autoport Supplier Code of Conduct outlines the minimum standards we expect our suppliers to uphold in key areas such as ethics, human rights, labor rights, health and safety, environmental protection, and related management systems. These standards apply throughout the duration of the supplier’s business relationship with Autoport, including any extensions.

An important foundation of our policies is the application of international environmental standards, which are implemented with consideration for local and industry-specific conditions. We incorporate environmental requirements into our contracts with both customers and suppliers to ensure alignment with our policy commitments.

Autoport Terminal Operators places high importance on the supply chain as part of our broader sustainability strategy. We expect our suppliers whether vendors or third-party providers of products and services to adopt Environmental, Social, and Governance (ESG) principles in support of our sustainable procurement and supply chain practices.

Accordingly, we prioritize occupational safety, environmental responsibility, and energy efficiency in the evaluation and selection of products and services particularly in the preparation of technical specifications.

Autoport encourages compliance with this Code in accordance with the International Covenant on Civil and Political Rights, the United Nations Global Compact, and the principles and recommendations for business conduct set out by the United Nations and the International Labour Organization (ILO).

Where suppliers engage affiliates or subcontractors to deliver goods or services to Autoport, they are expected to implement appropriate procedures to ensure these parties also comply with the base standards set out in this Code.

# OBJECTIVE

The Supplier Code of Conduct sets out the basic rules that we expect all our suppliers who have a business relationship with Autoport to comply with.

Our suppliers are expected to implement the necessary policies and procedures to ensure compliance with the Supplier Code of Conduct and to take communication and training actions to ensure that employees adopt the rules.

# SCOPE

In the context of business relationships, Autoport expects our suppliers to commit to minimum standards in key areas such as ethics, human rights, labor rights, health, safety, the environment, and relevant management systems during the duration of this relationship and in the event of any extension.

# FUNDAMENTAL PRINCIPLES

* 1. **Compliance with Laws and Regulations**

Autoport’s suppliers are required to fully comply with all applicable legal regulations. They must also adhere to the rules governing Autoport’s operations, as outlined in the documents that define the relationship between Autoport and its suppliers (such as general terms and conditions, agreements, etc.).

If any of the standards in this Code conflict with applicable legal requirements, we expect suppliers to notify us and work with Autoport to ensure compliance with the Code.

# FIGHTING AGAINST BRIBERY AND CORRUPTION

Autoport is committed to conducting its business honestly and ethically and to complying with all relevant anti-bribery and anti-corruption laws and regulations in its operations worldwide.

Autoport prohibits all bribery and corruption, whether public or private, for the benefit of, or obtained from, any third party. Autoport acts honestly and in compliance with the legislation and ethical values of each country in which it operates. The company and its employees are strictly prohibited from engaging in any act of bribery or corruption, and zero tolerance is applied.

Accordingly, the company expects its suppliers not to engage in any acts of bribery or corruption and to comply with all applicable anti-bribery laws and rules and international regulations.

Our Suppliers shall also prohibit all forms of bribery, corruption, extortion, embezzlement, money laundering, tax evasion, insider trading, market manipulation and shall act in full compliance with applicable laws.

Suppliers shall not, directly or through intermediaries, give or accept bribes or participate in other illegal inducements or illegal payments in business or government relations. Suppliers shall ensure that they, their affiliated organizations and their permitted subcontractors have adequate systems in place to prevent bribery and fight against corruption.

# Data Protection and Privacy

Autoport respects the privacy of its employees, customers and all stakeholders and complies with their legal and contractual obligations.

Suppliers shall undertake to meet the reasonable expectations of their customers, suppliers, and employees regarding the protection of all data made available to them (regardless of whether such data constitutes personal data) and to ensure that third parties, including business partners, do not have unauthorized access to the data.

When collecting, processing, transmitting, and transferring data, the supplier must comply with data protection and information security laws and governmental regulations, as well as with the conditions stipulated in its contract with Autoport. If any issue arises regarding the supplier’s ability to maintain the confidentiality and integrity of any type of data, Autoport must be informed without delay.

All information relating to Autoport, its employees, customers, and third parties is confidential. Any access to and storage of such information is subject to the provisions of the legislation in force and the provisions governing the legal relationship between us and our supplier (general conditions, contracts, etc.). If a procurement process involves the processing of personal data, suppliers must process such data in accordance with the guidelines contained in the specific data protection clauses and comply with any additional security and organizational measures required. They must also ensure that such data is processed in an appropriate and confidential manner and in compliance with the duty of confidentiality.

Suppliers may disclose or transfer personal data to third parties only with Autoport’s prior written consent, when acting as a data processor, where legal grounds are established, and where adequate protection of personal data is ensured in accordance with the law.

Suppliers are required to have appropriate security measures, rules, and procedures in place to ensure compliance with all applicable laws governing international data transfers, where relevant.

# Conflict of Interest

Autoport ensures that its direct or indirect activities and personal interests do not conflict with objective and sound decision-making processes carried out in the best interest of the company.

Suppliers must take reasonable care to avoid and manage conflicts of interest. If a real or perceived conflict of interest arises, suppliers are expected to inform all affected parties.

Autoport recognizes that establishing honest and transparent relationships with suppliers is vital to the sustainability of these relationships. It makes significant efforts to evaluate all existing and potential suppliers equally and fairly within the framework of objective rules.

If suppliers have any family ties or other relationships with employees of the company they are working with that may give rise to a conflict of interest, they must immediately disclose this to Autoport or ensure that the relevant employee discloses it.

Suppliers must have reliable internal procedures in place to control and verify any actual or potential conflict of interest that may arise in any procurement process they intend to carry out with Autoport and must immediately report any such situation to Autoport. Any person affected by a conflict of interest must refrain from participating in the procurement process in question.

# Money Laundering

Money laundering is the act of trying to conceal the source of the proceeds of a crime. Money laundering is a very serious crime according to the authorities.

Employees are strictly prohibited from participating in or facilitating a transaction intended to conceal the source of funds.

Suppliers shall only engage in legitimate business activities and shall not accept or handle cash or other assets that give reason to suspect the proceeds of a crime.

# Forced Labor and Child Labor

Autoport opposes the use of forced labor and child labor and complies with all relevant laws and regulations. It acts in accordance with the Minimum Age Convention (ILO Convention 138).

In addition to adhering to the Minimum Age Convention mentioned above, our suppliers must comply with all applicable laws and regulations to prevent slavery and human trafficking throughout the supply chain.

This includes refraining from using or soliciting any form of forced labor at any stage of their service and not condoning child labor or unpaid labor.

# Non-Discrimination

Autoport ensures equal opportunity for its employees. The official language of the working environment is Turkish.

Autoport is committed to providing a work environment free from discrimination and harassment, providing equal opportunities in all aspects.

Suppliers must provide a workplace free from discrimination. There must be no discrimination based on race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status. In addition, employees must not be subjected to any unacceptable behavior, such as sexual, physical or mental harassment.

# Fair Competition Practices

Autoport’s competition policy requires compliance with fair and relevant competition regulations at all times.

In the conduct of their activities, suppliers are committed to pursuing consumer welfare under conditions of free and fair competition with their competitors. It supports the provision of innovative products and services that add value.

Suppliers are strictly prohibited from abusing their dominant position in their markets, price fixing and market sharing, engaging in behaviors and actions that may adversely affect competition between their commercial parties, and entering into agreements restricting competition.

# Gifts

In order to protect its employees from conflicts of interest that may arise from the acceptance of gifts and hospitality practices and to carry out an accurate, honest, and fair purchasing policy in company purchasing processes, Autoport has set company rules regarding gifts and entertainment offers from our suppliers.

It is strictly forbidden for suppliers to provide gifts, payments, meals, entertainment, and similar items that may influence the business decisions of Autoport employees or create this impression. We ask our suppliers to comply with this, and it is strictly forbidden to give any kind of cash or cash-like gifts to Autoport employees.

# Safety, Health and Environment

Autoport strives to provide a safe and healthy working environment for every employee, no less than the standard set by the relevant laws.

Autoport is committed to providing a safe and healthy working environment for its employees and visitors to its facilities, preventing damage to the environment, and minimizing the impact of its activities on the environment.

Autoport's policy is to comply with safety and environmental laws and regulations and to develop a cooperative attitude with the inspection and enforcement personnel of the relevant establishments.

All occupational health and safety standards stipulated in local legislation must be met by our suppliers and all our suppliers must provide a healthy and safe working environment for their employees. Suppliers must notify their employees about occupational health and safety, including all legal regulations. In addition, all suppliers providing services in Autoport's port area must act in accordance with the occupational health and safety rules adopted and implemented by the company.

The supplier is responsible for providing a safe and healthy working environment and complying with all applicable health and safety laws where it operates. The supplier shall establish and implement appropriate occupational safety systems. It shall take the necessary measures to protect its employees from accidents and situations harmful to health that may arise in relation to work activities. Employees shall be regularly informed and trained on relevant health and safety standards and measures.

The Supplier must not support, condone or require any individual under the age of 18 to perform any hazardous work.

# Autoport Ethics Line

As a supplier of Autoport, if you observe any behavior or situation related to Autoport that may be illegal or in violation of the provisions set out in these rules, you can report it by sending an email to etik@autoport.com.tr.

The communication channels allow users to communicate with the authorities in a secure and confidential manner. It is very important that the whistleblower is free from any intentions to expose the whistleblower to others or to negatively affect his/her career. In this respect, confidentiality, objectivity and compliance with ethical rules are critical in the whistleblowing and investigation process. It is imperative that both the whistleblower and those who manage the process pay utmost attention and care to this issue.

# Management

The Code of Ethics and Compliance is operated in accordance with management procedures. Information is analyzed in an impartial and confidential manner. All relevant processes are managed quickly and diligently by the Ethics and Compliance Committee.

The person who made the notification is notified within the first 3 days with the registration number and a response that the notification has been received. Notifications are finalized within a maximum of 30 days (unless additional time is requested), taking into account legal deadlines (6 business days after the research team submits its report to the board).