

Anti-Bribery & Corruption Policy

1. Policy Statement

As a global logistics company, GENEL TRANSPORT opposes all forms of bribery and corruption, recognizes its responsibility to comply with anti-bribery and anti-corruption regulations, and adopts a zero-tolerance policy in this area. In line with our core value of Reliability and Transparency, accuracy, openness and integrity are essential in all business relationships. GENEL TRANSPORT does not compromise on compliance with national and international legislation applicable to its activities or with ethical values.

2. Scope

This policy applies to the Executive Board, managers, employees, suppliers, agents, consultants and all third parties acting on behalf of GENEL TRANSPORT.

3. Definitions

Bribery means directly or indirectly offering, promising, giving, requesting or accepting any material or non-material value by any person or organization, contrary to applicable laws, to obtain an improper advantage, where such value is provided as an inducement or reward for a person to perform or refrain from performing their duties.

Corruption means the misuse of office for personal gain.

Illegal benefit means a benefit obtained by breaching duties and responsibilities for the benefit of another related party.

Money laundering means the process of converting or transferring proceeds known to derive from any crime or crimes in order to conceal their illegal source.

Facilitation payment means unofficial payments made to secure or expedite a routine official action.

Anything of value includes unofficial benefits that may provide personal advantage, such as flight tickets, concert tickets, donations to a referred institution or organization, accommodation and hospitality, gifts, gift cards, fuel or vehicle provision, special discounts and medical treatment.

4. Prohibited Conduct

- GENEL TRANSPORT employees never accept or offer bribes in order to obtain any commercial advantage or benefit.
- They do not give or offer, directly or through third parties, anything of value, rewards or similar benefits to any public official, customer or supplier in order to influence decisions.
- They record every transaction related to their activities transparently and accurately.
- They act in accordance with applicable anti-bribery and anti-corruption legislation and the Code of Conduct.
- They do not make facilitation payments under any name to expedite or regularize official procedures.

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S.02.P.02 Anti-Bribery & Corruption Policy

- They do not use intermediaries or abuse personal relationships to influence a decision.
- GENEL TRANSPORT employees comply with local laws and regulations on the prevention of money laundering in the countries where they operate. They are also expected to comply with relevant foreign legislation, agreements and standards.
- GENEL TRANSPORT managers and employees never allow money laundering activities. In this context, managers and employees strictly follow the rules applicable when working with third parties.

5. Supplier and Business Partner Relations

GENEL TRANSPORT bases its business relationships on quality, performance, business ethics and rules of conduct. When selecting business partners, it considers not only commercial criteria but also alignment with ethical values. GENEL TRANSPORT expects its business partners and suppliers to comply with the rules set out in this policy.

6. Financial Records and Transparency

GENEL TRANSPORT records all financial transactions in line with the principles of transparency and accountability. All income and expenses are accounted for fully and accurately in compliance with the law. No transaction with an unknown source, without an invoice or without an adequate explanation is approved. Cash management and banking transactions are conducted strictly in accordance with the procedures specified by the Finance Department.

7. Reporting and Sanctions

All employees must report any suspected breach of this policy to their managers. Conduct contrary to ethical values may be subject to disciplinary penalties and legal sanctions. GENEL TRANSPORT takes all reports seriously. All reports received are kept confidential unless disclosure is required by law.