

Competition Law Compliance Policy

1. Purpose and Commitment

GENEL TRANSPORT aims to conduct its activities in compliance with competition legislation in order to inform employees about competition law, prevent competition violations, ensure full compliance and raise awareness. In line with the principle of Honesty and Integrity, our company always remains within ethical and legal boundaries in its relationships with competitors. Ultimate oversight responsibility in this area rests with management.

2. Relations with Competitors and Prohibitions

In all relationships with competitors, employees:

- Do not enter into written or verbal agreements with competitors on freight prices, pricing policy, discount rates, supply conditions, bids or similar matters that are intended to directly or indirectly prevent, distort or restrict competition in a specific market, or that may affect competition wholly or partly.
- Do not engage in route-based or region-based market sharing or supply restriction with competitors.
- Do not act jointly with competitors to exclude other competitors from the market.
- Do not enter into any written or verbal agreements with competitors that may be described as gentlemen's agreements.
- Do not exchange competitively sensitive information with competitors.
- Obtain information only from publicly available sources in accordance with the law and clearly state the source of such information in documents where it is used.
- If competitively sensitive information is sent to them by competitors, warn the relevant company and request that necessary legal measures be taken.
- If they receive requests from competitors contrary to competition legislation, consult the General Manager before responding and notify in writing that a positive response cannot be given.
- Report to the General Manager any events where there is doubt as to whether they may be contrary to competition legislation and act accordingly.

3. Sector Meetings and Events

When participating in sector meetings and events, care is taken to ensure that topics contrary to competition law, such as price and cost, are not discussed. If a conversation violating competition law occurs during a meeting or event, employees must leave the meeting and immediately inform their manager.

4. Dominant Position

GENEL TRANSPORT may acquire a dominant position in a particular region or market in its sector. In such cases, GENEL TRANSPORT employees may not abuse that dominant position.

Therefore, employees:

- May not engage in activities that prevent undertakings wishing to enter the relevant region or market or exclude existing competitors from the region or market.
- Do not use a dominant position to pressure competitors, other business partners, suppliers or third parties.

5. Competition Authority Inspection Process

The Competition Authority has the right to conduct on-site inspections. In such a case, all employees must be aware that serious legal sanctions may apply if the inspection is obstructed or information and documents are deleted or destroyed, and must act accordingly. If an inspection is conducted, the GENEL TRANSPORT employee must review and take a copy of the authorization documents of the officials responsible for the inspection and promptly inform the General Manager.

6. Reporting Violations and Sanctions

If an act contrary to this policy and therefore to competition law occurs, GENEL TRANSPORT may face severe fines and reputational risk. Therefore, if an employee or third party witnesses or suspects any situation contrary to this policy, it must be reported to management without delay. Sanctions to be applied in the event of a violation are decided by the General Manager. GENEL TRANSPORT takes all reports seriously and keeps them confidential unless disclosure is required by law.