

Conflicts of Interest Policy

1. Purpose

This policy aims to ensure that GENEL TRANSPORT employees preserve their impartiality while performing their duties and prevent their personal interests, or the interests of their relatives, from conflicting with the company's interests. GENEL TRANSPORT expects employees to use company resources efficiently and avoid any relationships that may damage the company's reputation.

2. Definition of Conflict of Interest

A conflict of interest is a situation where an employee's or their relative's private interests affect, or may affect, the employee's ability to perform their role in the company impartially and objectively.

3. Situations Requiring Attention

Examples that may be interpreted as conflicts of interest include, but are not limited to:

- Holding shares in a GENEL TRANSPORT supplier or business partner, or having close relationships with its shareholders.
- Directly or indirectly carrying out activities that would require the employee to be considered a merchant.
- Working for another person or organization, during or outside working hours, under any name or title, in return for payment or similar benefit.
- Receiving gifts or personal discounts from suppliers or business partners that may influence decision-making processes.
- Receiving commissions from customers, business partners or suppliers.
- Being an agent, part of management or supporter of a business partner or supplier.
- Working with, or hiring, a relative or acquaintance.

Employees must avoid any action, including but not limited to the above, that may result in a conflict of interest.

To avoid potential conflicts of interest, employees:

- Do not use information obtained through their duties for personal benefit and do not share it with relatives.
- Do not enter into personal debt or receivable relationships with other GENEL TRANSPORT employees or third parties.
- Do not establish commercial relationships with relatives on behalf of GENEL TRANSPORT.
- Inform their superiors and relevant departments if they have a personal relationship with third parties involved in GENEL TRANSPORT commercial decision-making processes.

- Ensure that personal investments do not prevent them from dedicating the time and care required to fulfil their responsibilities at GENEL TRANSPORT.

4. Declaration, Management and Reporting Process

Transparency is essential at GENEL TRANSPORT. Employees must immediately notify their manager in writing of any potential or perceived conflict of interest. Making a notification does not mean the employee has made a mistake; on the contrary, it demonstrates commitment to integrity and transparency. GENEL TRANSPORT takes all reports seriously and keeps them confidential unless disclosure is required by law.

5. Decision Mechanism

Supplier or business partner selection decisions are made according to the value of Excellence, supplier performance and quality standards, not personal relationships. In the use of company resources and business decisions, GENEL TRANSPORT's reputation is always the priority.