

Gifts & Entertainment Policy

1. Purpose

GENEL TRANSPORT builds its business relationships on the core values of Reliability and Respect. This policy sets the appropriate criteria and principles for gifts and entertainment given on behalf of GENEL TRANSPORT and offered to GENEL TRANSPORT employees. It also aims to preserve impartiality in GENEL TRANSPORT's commercial decisions and prevent any misperception in relationships with third parties that may damage corporate reputation. GENEL TRANSPORT employees and parties acting on behalf of GENEL TRANSPORT must comply with this policy.

2. Scope

GENEL TRANSPORT employees may not accept or offer any gift, entertainment or benefit, whether or not it has economic value, that is intended to influence business decisions, creates such an impression, is clearly tied to a return during the performance of duties, or affects or may affect impartiality, performance, decisions or conduct. Supplier or business partner selection is based not on personal relationships or benefits provided, but on service quality and price advantage in line with the principle of Excellence.

3. Acceptable Gifts and Entertainment

It is recognized that gifts, refreshments, hospitality and travel expenses may occur worldwide to build goodwill, contribute to professional development and academic or scientific work, and strengthen business relationships, and that they may be considered part of doing business as commercial courtesy.

Low-value promotional items such as pens, agendas, calendars, works of art, souvenirs and notebooks; entertainment organizations; event tickets; accommodation and transportation opportunities; reasonable business meals during or after business meetings; and participation in business-related conferences and seminars and their fees may be considered appropriate under this policy.

In this context, gifts and entertainment given only within the limits of commercial courtesy must comply with the following principles:

- Gifts and entertainment must not occur frequently and must not have a value that cannot be considered modest.
- They must be acceptable in the ordinary course of business and must not be provided as a means of payment or commission.
- The gift received must not create a conflict of interest or breach of loyalty and must not influence commercial decisions.
- Gifts and entertainment offers from parties in a business relationship or contract process with GENEL TRANSPORT, or that are or may be considered to be provided in expectation of a return, must not be accepted.
- Cash or cash-equivalent gifts, such as gift certificates, discounts, loans, shares or stock options, must not be accepted.

- Gifts and invitations contrary to public morality, of a sexual nature, or that may adversely affect GENEL TRANSPORT's reputation must not be accepted.
- They must not violate applicable laws and regulations.
- Gifts from a single source exceeding USD 20 must not be accepted without permission and approval from GENEL TRANSPORT managers. Any gift that does not comply with the principles in this policy must not be accepted even if it falls within this limit.

4. Prohibited Gifts and Entertainment

The following are strictly prohibited and are assessed under the Anti-Bribery and Corruption Policy:

Cash and Cash Equivalents: Giving or receiving cash, gift cards, gold, shares and similar items.

Luxury and Excessive Hospitality: Vacation, accommodation or entertainment invitations exceeding reasonable limits.

Expectation of Return: Any gift given before a tender, agreement or transaction with the intention of influencing a decision.

5. Declaration, Reporting and Approval Process

Any action by a GENEL TRANSPORT employee or third party contrary to this policy or applicable legislation may harm GENEL TRANSPORT's reputation. Therefore, if an employee or third party witnesses or suspects any situation contrary to this policy or applicable legislation, it must be reported to the General Manager without delay.

When faced with gifts or entertainment during work, GENEL TRANSPORT employees are expected to act with common sense in any doubtful situation. Written approval from a manager must be obtained for borderline cases. When a high-value gift is offered, it must be politely declined and the General Manager must be informed.

GENEL TRANSPORT takes all reports seriously and keeps them confidential unless disclosure is required by law.

6. Customer and Supplier Relations

GENEL TRANSPORT maintains professional distance in its relationships with customers and suppliers. GENEL TRANSPORT employees must meet customer expectations through quality service without any personal benefit relationship.