

Anti-Bribery and Corruption Policy

Purpose

This Anti-Bribery and Corruption Policy (“**Policy**”) has been prepared to establish the responsibilities of Battal Denizcilik Anonim Şirketi, Battal Marine Gemi İşletmeciliği Anonim Şirketi, and their subsidiaries (“**Battal Group**”) employees, managers, business partners, and all relevant stakeholders regarding the combating against bribery and corruption, and to create a transparent and ethical business environment.

Scope

This Policy applies to all employees, managers, suppliers, business partners, representatives, and individuals or entities acting on behalf of Battal Group under any title.

Definitions

- **Bribery:** The act of offering, giving, requesting, or accepting an unjust benefit, payment, gift, service, favor, or similar advantage, either directly or indirectly, to or from an authorized person or institution to influence their decisions or actions.
- **Corruption:** The abuse of power by an individual or group to secure unfair benefits or advantages for themselves or others.

Core Principles

The core principles define Battal Group's commitment to combating bribery and corruption and establish the ethical standards to be adhered to. These principles reflect Battal Group's commitment to managing ethical and legal processes and may include additional practices and procedures that promote transparency, ethical behavior, and the fight against bribery and corruption.

1. **Compliance with Laws:** Battal Group fully complies with all applicable anti-bribery and anti-corruption laws in the countries where it operates.
2. **Zero Tolerance:** All forms of bribery and corruption are strictly prohibited.
3. **Ethical Conduct:** All employees and business partners of Battal Group are obligated to act in accordance with ethical values, applicable laws, and this Policy.
4. **Relations with Intermediaries:** Battal Group ensures compliance with ethical and legal standards in transactions conducted with intermediaries to prevent bribery and corruption activities.

Policy Principles

The principles of this Policy outline Battal Group's commitments to combating bribery and corruption. While the following principles describe significant rules of this Policy, they do not limit the steps Battal Group may take to uphold its ethical values and ensure legal compliance.

- **Gifts and Hospitality:** Employees and business partners are prohibited from offering or accepting any gift, hospitality, or benefit that could influence business decisions.

- **Donations:** Battal Group prohibits any payment or contribution, whether monetary or in-kind, to political parties, associations, or individuals for facilitating transactions or providing benefits. Any donations made must be transparently recorded and comply with applicable regulations and this Policy.
- **Suppliers and Business Partners:** Battal Group requires all suppliers and business partners to adhere to this Policy and act in accordance with the relevant anti-bribery and corruption laws.
- **Maritime and Trade Practices:** Battal Group requires all parties involved in shipping agency, ship management, maritime trade, and general trading activities to comply with anti-bribery and anti-corruption laws. Transparency is essential in customs procedures, port services, and international trade operations.
- **Agents and Intermediaries:** All transactions conducted through agents, intermediaries, suppliers, or contractors acting on behalf of Battal Group must comply with legal regulations and ethical standards. Agents, intermediaries, suppliers, or contractors acting on behalf of Battal Group are required to comply with this Policy and all applicable anti-bribery and anti-corruption laws. Battal Group will terminate its relationship with any individual or entity found to violate this Policy or relevant regulations.

Reporting and Investigation

- Suspicions of bribery or corruption must be reported to Battal Group immediately.
- All reports will be kept confidential.
- Reports can be submitted via compliance@battal.com.tr or legal@battal.com.tr.

Sanctions

Any transactions or agreements involving individuals or entities that violate this Policy will be terminated upon discovery of the violation. Employment contracts of Battal Group employees found in breach of this Policy will be terminated. Battal Group reserves all legal and criminal rights against individuals or entities acting in violation of this Policy.

Review and Amendments

This Policy is reviewed and updated as necessary in accordance with Battal Group's needs and legal regulations.

Effective Date: January 2025