

CODE OF CONDUCT & ETHICS FOR BUSINESS PARTNERS

ANAPET TAŞIMACILIK ANONİM ŞİRKETİ's Code of Conduct & Ethics establishes the standards for how those working with and for EFOR interact with customers, colleagues, investors, business partners and regulators. We adopt internationally recognized standards to comply with both the letter and the spirit of the law. We expect our business partners to uphold similar levels of best business practices.

1. CORE ETHICAL PRINCIPLES

- 1.1. **Anti-Bribery & Corruption:** Zero tolerance for bribery, corruption, facilitation payments, or extortion. Business partners must ensure compliance with anti-corruption regulations.
- 1.2. **Gifts & Hospitality:** Must remain appropriate, transparent, and never intended to secure unfair advantage.
- 1.3. **Anti-Money Laundering & Financial Integrity:** No involvement in money laundering, terrorist financing, or fraudulent transactions.
- 1.4. **Sanctions & Trade Compliance:** Full adherence to international sanctions regulations.
- 1.5. **Market & Competition Conduct:** Business practices must reflect genuine economic activity and fair competition.
- 1.6. **Conflicts of Interest** : Any potential or actual conflicts of interest must be disclosed immediately.

2. RESPONSIBILITY TO PEOPLE & SOCIETY

- 2.1. **Health, Safety, and Environment (HSE):** Safety is a top priority in rail transport and logistics. Business partners must protect employees, contractors, customers, and the environment.
- 2.2. **Human Rights & Labor Standards:** Respect for fundamental rights. No forced labor, child labor, or discrimination.
- 2.3. **Communities & Sustainability:** Operations should minimize environmental impact. ANAPET encourages sustainable practices.

3. WORKPLACE CULTURE

- 3.1. **Dignity & Respect:** Equal opportunity and inclusion must be upheld. Harassment or discrimination is unacceptable.
- 3.2. **Fair Employment & Professional Conduct:** Treat all employees with fairness and professionalism. Recognition based on merit.

Concerns must be reported to the Compliance Department: info@anapet.net. ANAPET enforces a strict no-retaliation policy. Violations may result in suspension or termination of business relationships.

By working with ANAPET, all business partners acknowledge their responsibility to uphold these principles and commit to continuous improvement in ethics and sustainability.