	COMPANY POLİCY			
	<u>Document No:</u> PO.1	<u>Release Date:</u> 31.12.2020	<u>Revision No:</u> 00	<u>Revision Date:</u> -

Meke Marine is committed;

- To make quality, environment, occupational health and safety and anti-bribery management systems a top priority for all employees that they agree and create a culture of safety,
- By determining the dangers beforehand, to minimize the risks, share possible incidents and near miss incidents with staff and record these,
- To use natural resources most efficiently and economically,
- By preventing and reducing all kinds of pollution at its source, to conduct its manufacturing and provide its services sensitively and in an environment-friendly manner,
- To train all working personnel and interested parties, increase their awareness of responsibility and competence,
- To increase the quality of services and products consistently,
- To comply with national and international laws, regulations and conventions and other requirements in all fields of activity,
- To meet all customer demands and requirements of customer satisfaction without interruption,
- To enforce an anti-bribery law in all activities in order to prevent and detect corruption and react against it,
- MEKE promises to monitor and develop the Integrated Management System continuously and implement a sustainable system with targets as a result, to state that to customers, subcontractors, suppliers, third parties and authorities in suitable communication way and to help them to understand MEKE's values and services easier.

M. Hakan Çiner
General Manager



GIFTS AND ENTERTAINMENT POLICY

Document number:
PO.2

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1. OBJECTIVE AND SCOPE

This here present policy has been regulated to depict the procedures and principles pertaining to the legitimate framework of the gifts that are accepted or given for the purpose of strengthening business relations of our employees with customers, suppliers and other third parties and also participation in representation / hospitality activities organized by other organizations and finally representation / entertainment activities which will be organized by our company

the legitimate framework of gifts given and/or received to strengthen business relationships and the framework of the entertainment activities organized by the company are described within the scope of this policy. The policy is applied in all locations of the company.

2. DEFINITIONS AND ABBREVIATIONS

- **Gifts:** They are products that are generally given or accepted among people in a business relationship, for commercial courtesy or thanks, and do not require any material or moral compensation.
- **Conflict of Interest:** It refers to the situation where the employee has any kinds of benefits or personal interests that can be measured with money or not, provided to him, his relatives, friends or the person or organizations with whom he has a relationship, while making a decision or performing his duty.
- **Entertainment:** It refers to the situations where at least one of the company employees is hosted or is in the position of host. It covers topics such as hospitality, eating and drinking, cultural or sporting activities.

3. RESPONSIBILITY

The responsibility for the preparation, modification and supervision of this policy belongs to the Ethics and Compliance Committee; the responsibility for the implementation belongs to all company employees and the Board of Directors; and the responsibility for the approval belongs to the top management.

The management of the policy is under the responsibility of the Ethics and Compliance Manager of the Company. However, all company executives are responsible for managing the business processes included in the administrative and commercial functions for which they are responsible, in accordance with the policy.

4. POLICY

Social relations of company employees with individuals with whom they have business relations such as customers, business partners and suppliers are part of the normal course of life. However, it is essential to ensure that these relationships do not cause conflicts of interest. Even when receiving gifts is legal, employees may not receive them in violation of our company rules.

Company employees cannot accept gifts from customers or business partners or suppliers from whom the company purchases goods or services, and cannot make offers to request gifts in any way.

In exceptional cases where the willingness of the employees not to accept the gift is not accepted by the other party and therefore there is a risk of damage to the business relationship, gifts that are suitable for commercial practices and of low material value may be accepted. The basic requirement that should be fulfilled here is the knowledge and permission of the Ethics and Compliance Committee to which the employee is affiliated.

Gifts such as cash gifts, precious metals such as gold or gifts that are easy to exchange in cash are not accepted under any circumstances.

Non-cash offers such as free holidays, discount vouchers, gift vouchers, unusually high discounts are also considered as gifts and benefits and are not accepted.



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Provided that it is not requested by the employee personally, promotions that can be given periodically such as agenda, pen, calendar and have a nominal value rather than monetary value can be accepted.

Gifts with low material value are recorded in the relevant unit/department by indicating some information such as the employee name, date of acceptance, type, amount, and the presenting party. The gift having low material value has been determined by our Ethics and Compliance Committee as **a gift corresponding to 20 US Dollars**.

There is no need to keep records for products with no tangible value.

Accepted gifts should not create the impression that the gift giver has received a priority treatment, or any privilege, or this situation should not damage the image of the company.

The above-mentioned regulations also apply to gifts given to employees' family members within the framework of relationships arising from employees' duties.

Provided that the managers do not propose themselves and only in case of celebrations on special occasions, managers may accept gifts that are not having high material value and that are within the usual limits, given directly or indirectly from their employees or from their managers (giving gifts to the extent that they are accountable to the Ethics and Compliance Committee of the organization).

Company employees may participate in entertainment and catering organizations held for representation and entertainment purposes, provided that they are considered acceptable, reasonable and modest in the business world.

Provided that they are considered acceptable, reasonable and modest in the business world, the entertainment and meals organized by Company employees for representation and entertainment purposes are subject to the **limit determined by the management at the relevant moment. The representation entertainment limit is defined as a limit per person hosted. This limit is 500 TL per person for senior management personnel. This limit is 300 TL for department managers, provided that they can host maximum 4 people from outside the company.**

In cases where higher expenditure is required, the relevant staff should obtain the approval of the top management and should submit the justification after the expenditure. (Expenses can be made to the extent that they can be accountable to the ethics and compliance committee of the organization).

In case of organizations held within the company and organizations that the management will arrange for their employees the limit is determined by the management.

If the company or any party acting on behalf of the company hosts an invitation, travel and accommodation expenses of the guests are borne by the guests. Travel and accommodation expenses incurred by the company employees for invitation and work purposes are paid by the company. In both cases, the invitor may bear all travel and accommodation expenses, if there is a reasonable justification for doing so.

5. AUDIT, REVIEW AND COMPLIANCE

The audit of compliance with the provisions of this policy is carried out every year within the scope of internal audit. In case of an unwanted notification during the year, the Ethics and Compliance Committee takes the necessary actions and decides on the notification.

This policy is reviewed annually under the coordination of the Ethics and Compliance Manager of the Company in terms of compliance with all local and international laws which it refers to.

Other changes and revisions will be prepared by the Ethics and Compliance Committee as a result of the company's evaluations regarding the relevant risks and the justified change and revision proposal will be submitted to the Company's Board of Directors. Upon the approval of the Company's Board of Directors, Ethics and Compliance Manager of the Company puts the change and revision into effect.



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The compliance with this policy can be measured and followed by periodic surveys and audits, compliance assessment and self-assessment tools.

If you have any questions about the content or implementation of these policies, you can contact Ethics and Compliance Manager of the Company at etik@mekemarine.com or by calling **0 544 944 63 53**.

Necessary disciplinary actions, up to the termination of the employment contract, shall be imposed within the framework of the Company's Code of Ethics and Discipline, in case of behaviors that are found to be in breach of the rules of this policy. In case the legal conditions are created, the situation is notified to the judicial authorities.

6. REVISION HISTORY

Revision Number	Revision date	Revision Description
00	31.12.2020	First publication



DONATION AND AID POLICY

Document number:
PO.3

Issue date:
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1. OBJECTIVE AND SCOPE

This here present policy is designed to ensure that donations made by our organization are made in accordance with local laws and our business ethics principles.

This here present policy covers the rules that must be followed in donation or aid activities to be given in our company.

2. DEFINITIONS AND ABBREVIATIONS

- **Donation:** Donation is giving someone something useful or something that will satisfy a need (money, goods, etc.) for kindness and aid purposes.
- **Help:** It is to use one's own strength and possibilities for the good of another person.
- **Incompatibility, Noncompliance, Improper Behavior, Misconduct :** These are acts and attitudes that are against the laws of the Republic of Turkey, local and international agreements, laws, regulations to which the company is subject due to its commercial subject and field of activity or Staff Handbook.

3. RESPONSIBILITY

The responsibility for the preparation, modification and supervision of this here present policy belongs to the Ethics and Compliance Committee; the responsibility for the implementation belongs to all company employees and the Board of Directors; and the responsibility for the approval belongs to the top management.

The management of the policy is under the responsibility of the Ethics and Compliance Manager of the Company. However, all company executives are responsible for managing the business processes included in the administrative and commercial functions for which they are responsible, in accordance with the policy.

4. POLICY

The main purpose of donations and aids is to fulfill our social responsibilities, to create a sense of corporate responsibility among our partners and employees, as well as to meet social and community needs and to provide benefit to the public.

For this purpose, we also support the realization of projects that will contribute to social development.

Social responsibility projects are an important part of our corporate identity. Aids made within the framework of Social Responsibility projects and all other donations and aids are made in accordance with legal regulations, the company's vision, mission, policies and Company Ethical Principles.

The company, with the understanding of corporate social responsibility, can provide aid and donations to persons , non-governmental organizations, associations or foundations beneficial to society and the environment, universities, public institutions and organizations, universities, natural disaster areas, disaster relief committees and similar institutions operating in the fields of education, culture, arts, environment and sports, in a way that does not interfere with its own purpose and subject. (These aids and donations may not be limited to the aforementioned ones).

The upper limit of donations to be made and the validity period of this upper limit have been determined by our Board of Directors.

Donations and aids made by the company for a certain year cannot exceed 100.000 TL in total.

It is not possible to make aids at amounts exceeding the amount determined by the Board of Directors of the Company and the limits determined for the relevant period.



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The amount of donation made during the year is added to the distributable profit base in calculations that are made regarding profit distribution.

Donations made during the year are submitted to the information of the shareholders in the following ordinary board of directors.

It is a prerequisite that the donations to be made do not contradict with the regulations of disguised profit transfer.

Donations and aids cannot be made to any public official, to persons and institutions over which a public official or institution has direct or indirect authority or interest, to persons or organizations whose company customers or suppliers have direct or indirect authority or interest bonds; scholarships cannot be awarded to first degree relatives of these persons.

Aids and donations can be announced to the relevant parties, upon request.

Donations and aids can be made in two ways, i.e. in cash and in kind.

All donations and aids and scholarships given by the company are recorded.

5. AUDIT, REVIEW AND COMPLIANCE

The audit of compliance with the provisions of this here present policy is carried out every year within the scope of internal audit.

All donations, aids and scholarships are recorded in the company's official books and are confidential information.

This here present policy is updated annually from its entry into force, under the coordination of the Ethics and Compliance Manager of the Company, in terms of compliance with all local and international laws which it refers to.

Other changes and revisions will be prepared by the Ethics and Compliance Committee as a result of the company's evaluations regarding the relevant risks; the justified change and revision proposal will be submitted to the Board of Directors of the Company and enter into force with the approval of the Board of Directors of the Company.

The compliance with this policy can be measured and followed by periodic surveys and audits, compliance assessment and self-assessment tools. If you have any questions about the content or implementation of these policies, you can contact the Ethics and Compliance Manager of the Company at etik@mekemarine.com or by calling **0 544 944 63 53**.

Necessary disciplinary actions, up to the termination of the employment contract, shall be imposed within the framework of the Staff Handbook and Disciplinary Regulations., in case of behaviors that are found to be in breach of the rules of this policy. In case the legal conditions are created, the situation is notified to the judicial authorities.

6. REVISION HISTORY

Revision Number	Revision date	Revision Description
00	31.12.2020	First publication



POLICY OF AVOIDANCE OF CONFLICTS OF INTEREST

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PO.4

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1. OBJECTIVE AND SCOPE

This here present policy allows the definition of guidance, support and control functions for company activities and it is aimed to clearly lay down the rules on all matters where company conflicts of interest are likely to occur thereof. In line with this purpose, it is aimed to prevent conflicts of interest that may arise between the legal entity of our company, its partners, employees, managers, persons directly or indirectly related to them and its customers in their relations with customers, or the conflicts of interest that may arise between a customer and another customer, as well as to take necessary measures in this regard.

This here present policy covers the rules to be followed in conflict of interest activities.

2. DEFINITIONS AND ABBREVIATIONS

- **Conflict of interest;** It refers to all kinds of interests measurable or not in monetary terms that do or may affect the employees' ability to perform their duties in an impartial manner and it also refers to the state of having any personal interest regarding these interests.

3. RESPONSIBILITY

The responsibility for the preparation, modification and supervision of this here present policy belongs to the Ethics and Compliance Committee; the responsibility for the implementation belongs to all company employees and the Board of Directors; and the responsibility for the approval belongs to the top management.

The management of this here present policy is under the responsibility of the Company Ethics and Compliance Manager. However, all company executives are responsible for managing the business processes included in the administrative and commercial functions for which they are responsible in accordance with the policy.

4. POLICY

Our company is aware of the importance of complying with the rules regarding conflicts of interest, as well as the legal and reputational risks arising from the lack of rules and organizational controls in this field. Therefore, our main goal is to spread a corporate culture that values avoiding conflicts of interest.

Our company must act fairly and honestly, taking into account the interests of its customers and the integrity of the market while providing a wide range of products and services to its customers.

This here present policy defines practices and procedures to assist employees in identifying and managing conflicts of interest, and it provides general information about the measures taken to detect, manage and record conflicts of interest that are listed here below.

- Conflicts arising from the employee's personal interests,
- Conflicts regarding the provision of investment services and activities,
- Conflicts related to ancillary services and activities,
- Organizational conflicts,
- Conflicts arising from relationships with partners, subsidiaries and affiliates.

Failure to manage conflicts of interest may harm the reputation of our organization by causing negative public impressions. Furthermore, it can result in regulatory measures and sanctions that can be imposed by public institutions or regulatory agencies.

Along with this here present policy, other legal regulations, employment contract, Staff handbook, ethical rules and other policies will guide in any conflict of interest that may arise.



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Notification of Conflict of Interest Violations

In order to protect the reputation of our company, all our employees are individually responsible to report any situation related to the violation of a conflict of interest.

In the event that any employee violates the rules indicated in this here present policy, the relevant notification regarding the conflict of interest is made through communication channels, in line with the application principles defined in the policy.

Reporting or ignoring situations contrary to the conflict of interest, although a conflict of interest is detected or occurred, will also be considered as a violation of the conflict of interest rules.

In the event that our employees encounter an issue that may represent a conflict of interest while performing their work, or if they are not sure how to manage it, or in cases of situation against the legal requirements and regulations in force, they should contact the manager and the Ethics and Compliance Committee.

Matters related to such conflicts of interest are evaluated by the Ethics and Compliance Committee.

Communication channels have been established to report those who violate the principles of practice regarding the conflict of interest policy and the rules specified in this here present policy, or any suspicious situations that may harm the company's reputation and trust.

If you have any questions about the content or implementation of these policies, you can contact the Ethics and Compliance Manager of the Company at etik@mekemarine.com or by calling **0 544 944 63 53**.

Conflict of Interest Violation and Its Consequences

Our managers and all our employees are expected to act in accordance with the rules specified in this here present policy while performing their duties.

It is important for our managers and all our employees to take these rules as reference, to make sure that they act in accordance with what is written in this here present policy and in accordance with the purposes for which it is written, and to fulfill their duties in the most effective and correct way in line with the goals of our organization.

Not knowing the rules that are described in this here present policy is not an excuse for the violation of the mentioned rules.

Various sanctions and disciplinary penalties, including termination of employment and depending on the nature of the incident may come into question in case of violation of this policy.

Role of the Ethics and Compliance Committee

The Ethics and Compliance Committee is responsible for identifying, evaluating, managing and monitoring conflicts of interest. In this context, it works with the relevant administrations to identify conflicts of interest and to determine actions to reduce conflict of interest.

The Committee informs the senior management periodically regarding conflicts of interest.

Conflict of Interest:

Conflicts of interest arise when the personal interests of our employees and the interests of the company affect each other, hinder each other, or when the interests between the parties affect or prevent each other, including but not limited to the following.



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Even if a conflict of interest arises at the end of a situation that is not unethical, the occurrence of such a situation may damage the trust in our company.

The cases that may be subject to conflict of interest include but are not limited to the following examples that are given in order to illustrate possible conflicts of interest that may be encountered.

- **Conflict of interest between a customer and our company:** For example, conflicts of interest in the form of the preparation of research reports, trading transactions, the possibility of an unfair transaction as a result of participation in the public offering, and the financial loss of other customers against the financial gain of some customers.
- **Conflict of interest between a customer and an employee:** For example, (i) an employee has invested substantially in the financial products of a company and at the same time serves clients as investment advisor to the investee company; or (ii) new shares of an investment are allocated to customer/employee accounts or orders for the same financial products are executed from customer and employee accounts.
- **Conflict of interest among different customers:** For example, being employed by two different clients for consultancy services related to the same company within the scope of capital markets consultancy activity.
- **Conflict of interest between our company and the employee.** For example; (i) the employee has a significant amount of shares in a supplier of our company, and also participates in the purchasing decisions of our organization, or (ii) an employee has been employed by a company outside of our organization that is a customer, supplier or competitor of our company,
- **Conflict of interest between our company and an affiliate:** For example, capital markets service or activities are provided to a member of a legal entity.
- **Conflict of interest among the partners:** It is the conflict of interest that may occur between the controlling shareholders of our company or its affiliates and minor partners.
- **Conflicts of interest that may arise due to the different activities of our company:** It should be ensured that an organizational structure that will minimize conflicts of interest and provide the necessary independence due to the different activities carried out by our company or its subsidiaries is established and necessary precautions are taken.

Our company itself, its partners, employees, directors and real and legal persons directly or indirectly related to them;

- Cannot do business or transaction in order to gain financial gain or reduce or eliminate financial losses against the customer
- Cannot do business and transaction to obtain benefit from the service and activity offered to the customer, although the customer does not have an interest,
- Cannot do business or transaction for the purpose of obtaining financial gain other than the standard fee and commission from anyone other than the customer, due to the service and activity provided to the customer, and cannot carry out services or activities for these reasons,

Our company aims to behave fairly and equally when making transactions and making recommendations on behalf of its customers. Especially in standard business relations with customers, when situations or recommendations that affect customer relations are in question, the matters specified within the framework of this policy should be followed in accordance with this policy.

In cases where a conflict of interest cannot be determined clearly within the scope of this policy, it should be avoided by refusing to participate in the proposed transaction/activity and by making the necessary notifications within the scope of this policy.

Within the scope of custody service, the security of the obtained customer information against other service units must be ensured.

Customers should not be given unfounded and misleading information that does not reflect the truth on the authorized subjects, as well as on the provided services.

It is essential to ensure the confidentiality of information belonging to customers and third parties related to the very issue.



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Conflict of Interest Management Model

Our company has adopted the model detailed in this here present policy for the detection and management of conflicts of interest. The model is applied according to our organization's own organizational structure, business environment and legal obligations and consists of the following:

- Defining the types of conflict of interest,
- Defining and implementing effective organizational measures to avoid and minimize the risk of adversely affecting the interests of stakeholders from a defined conflict of interest.
- Identifying situations that require disclosure of conflicts of interest,
- Recording conflicts of interest and
- Ending conflicts of interest.

Our employees at all levels are obliged to know and consider all possible conflicts of interest during their duties and to evaluate potential conflicts of interest that may arise within the framework of their responsibility.

Adoption of Organizational Measures

Our company defines and implements organizational measures to reduce/neutralize various types of potential conflicts of interest.

The effectiveness of organizational measures is evaluated in relation to the following items:

- Separating events by domain,
- Giving clear action rules to employees,
- Defining rules or creating information barriers and separating them
- Conflict control.

Handling Conflicts of Interest

Our company defines the evaluation and management processes for specific conflicts of interest in order to make decisions that can manage conflicts of interest.

Unresolved conflicts of interest are submitted to the function responsible for the management of conflicts of interest - whose name and contact information is included in this policy- in order to be resolved.

Conflicts that should be brought to the responsible function include the following situations:

- Serious or significant conflicts that cannot be agreed upon by functions,
- Situations where the management body/committee should be involved due to laws or regulations,
- Conflicts that involve stakeholders' conflict of interest in different group companies and that cannot be resolved (for example, conflicts between customers of two different group companies) are submitted for resolution to the function responsible for the management of conflicts of interest, whose name and contact information is included in this here present policy.

Conflicts that should be brought to the responsible function include the following situations:

- Serious or significant conflicts that could not be agreed upon by the conflicting functions of the group company,
- Situations in which the governing body/committee should be involved due to law or regulations.

The function responsible for the management of the conflicts submits the conflicts including the above determined situations, which cannot be resolved, to the General Manager when necessary.



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Disclosure of Conflict of Interest

While determining the procedures and measures for the management of potential conflicts of interest, our company, if it cannot provide the issues that will prevent or minimize the risk of damage to the interests of existing customers, affiliates and affiliates discloses all kinds of potential conflicts of interest before starting to work.

Disclosing a conflict of interest to a client does not remove our company's obligation to develop and implement effective organizational and administrative measures.

Disclosures should be made within a sufficient period of time and in a concrete manner, and contain sufficient detail to enable a customer to make an informed decision regarding the service received in the context of a conflict of interest that may arise.

Any statement should be fair, clear and not misleading.

Employees should also consider how a conflict of interest can be managed more appropriately within the framework of their responsibility. Disclosure should be seen as the last option for conflict of interest management.

Recording Conflict of Interest

Conflicts of interest should be monitored and documented. Identified conflicts, adopted actions and steps taken to manage them should be recorded.

Ending Conflicts of Interest

Although conflicts of interest are not permanent, if the situations that lead to the conflict disappear, the conflict ends.

Conflict of Interest Situations

Conflicts Arising from Employee's Personal Interests

Our company does not prevent its employees from engaging in external activities that will not cause them to neglect their internal responsibilities, that will not restrict them to act in accordance with the interests of the organization, and that comply with our ethical rules and working principles.

However, our employees participating in such activities should avoid possible or actual situations that conflict between the company and their interests.

Each of our employees, within the scope of the job under his/her responsibility,

- Refrain from causing situations that may create a conflict of interest or impression in their favor or in favor of their relatives, and do not take part in the decision-making process in matters that concern their own or their relatives' interests.
- Do not enter into any personal financial relations with customers and suppliers, and do not gain personal benefit by using business relationships.
- Do not allow gifts or offers of interest that could affect their own decisions and consent or create a conflict of interest.
- Use the company's assets and resources efficiently only for the benefit and benefit of the institution, they cannot directly or indirectly use their working time and company resources for personal gain and/or political activity and benefit.
- Avoid conflicts of interest that may gain unfair advantage in favor of themselves, their relatives or third parties by making use of their title and authority.
- In the event that the employee and the person who is in the first degree decision-making position regarding the same business in the company in the position of a customer or supplier are first-degree relatives or if it is



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learned that their relatives have a share or financial interest in another company with which they have a business relationship, they inform the manager to which they are affiliated.

- Use their time and effort for the organization, do not undertake any other responsibility that may create a conflict of interest, do not make personal investments that may cost their time and effort and create a conflict of interest, and cannot work with any other natural or legal person outside the company.
- Act in line with the principles of honesty and transparency in their relations with public institutions and organizations, and maintain distance and impartial relations.
- Protect corporate and customer secrets, do not take out information that provides competitive advantage and is proprietary to the company.
- Do not use the information they have obtained as a result of their duties in a way that will cause unfair gain for themselves, their relatives or third parties, or they do not cause damage to the institution or customers. In personal investments to be made, they take care not to fall into a conflict of interest with the current company.
- If the employee and the persons who are in the first degree decision-making position regarding the same business in the company in the position of a customer or supplier are first degree relatives, they inform the manager to which they are affiliated.
- Employees notify their employment in another company, if any, or if they participate in their investments, during their first recruitment, and this issue is particularly questioned during job interviews with candidates. Employees inform their managers of any changes that may occur in their situations and similar issues that may be perceived as conflicts of interest.
- Cannot enter into similar representation relationships with customers by proxy.
- In another company with which they have a commercial relationship, if they learn that their relatives have a share or financial interest, they inform the manager to which they are affiliated.

Conflicts of interest should be monitored in accordance with the applicable laws and regulations and other regulations, policies, circulars, directives and regulations issued by our company along with this policy.

If any employee is not sure about the existence of a conflict of interest or how it will be handled/managed, s/he is obliged to inform his/her senior manager without delay.

In case of continuing uncertainty, the senior manager should notify the relevant person whose contact information is included in the "Review and Communication" section of this policy.

In order to identify, evaluate, manage and report conflicts of interest, our employees must document and keep records of the conflict of interest within the framework of their internal responsibilities.

All of our employees should work and cooperate at the maximum level in order to present a copy of all documents related to the conflict of interest as and when requested.


Leaving Employees' Business with Our Company

It is a very important issue that should be considered that may create negative perceptions if our employees, after leaving their duties, personally establish a company or do business with our company as a partner of a company, in terms of sales, contracting, consultancy, brokerage, representation, dealership or in similar ways.

Before or after such a process, it is necessary to act within the interests of the company, to comply with our moral and ethical rules, and to prevent conflicts of interest before and after the process.

For a supplier in this situation, the relevant manager should contact the company that the supplier has worked for previously and prepare a report that there is no inappropriate situation and should inform the manager to which s/he is affiliated.

If there is an inappropriate situation, a commercial relationship should not be established with the person in subject.

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Such commercial relations are possible with the approval of the General Manager.

External Activities of the Employee

Employees of our company cannot directly or indirectly engage in activities that require them to be considered tradesmen or tradesmen and/or cannot be shareholders or partners. They cannot act as a board member or auditor in companies other than our organization and affiliate companies, and cannot work for a paid or unpaid business in any commercial business of real and legal persons without obtaining written approval.

All of our employees are obliged to act in accordance with the rules regarding their external activities pursuant to the Code of Ethics and Staff Handbook which is published by the institution.

Confidential Information, Insider Information and Information Barriers

Employees should treat carefully the confidential information and internal information; such information should only be used for the specific purpose or action for which it was disclosed, and should only be disclosed when necessary for the recipient to complete the tasks that are assigned to him/her and in compliance with the relevant clauses within any confidentiality agreement and legislation governing the institution. When such information is provided, the recipient must be clearly informed of this nature.

In addition, anyone having in possession internal information should not use the information for personal gain or when consulting on financial products or advising others to deal with those products, or should not disclose it to third parties.

Information Barriers help prevent and monitor the spread of confidential and insider information, as well as manage existing and potential conflicts of interest.

Incentives and Gifts

Our employees cannot demand, obtain or accept any goods / services or cash, checks and similar benefits regardless of their value that exceed the symbolic value **(Equivalent to \$ 20 USD)** (See PO.2 Gifts and Hospitality Policy) or may give the impression that they are given for the purpose of encouraging the realization of any business or transaction.

Priority of Customer Interests and Relations with Customers

Interests of the customers are considered a priority in all the activities of the company. The contracts signed with customers do not include provisions that may harm their rights and interests in violation of the rules of good faith. Customer interests are protected by ensuring that the products and services offered to customers are of high quality.

The company has adopted the transparency principle in relations with customers and has provided access to information regarding all transactions carried out by the customer. A clear language is adopted while providing information to customers and no information is given in an exaggerated manner or in a manner that may lead to misunderstandings.

Organizational Structure

The interests of its customers take precedence in the decisions taken by our company. Customers' priority is prioritized to the interests of the group in all decisions, including those that arise due to group relationships and are related to the customer's business or internal interests of our organization.

Employees of our company must always be impartial and objective while performing their duties and responsibilities.

The tasks of approving, implementing, recording and controlling activities and financial decisions and transactions in order to reduce the risks of errors, omissions, inaccuracies, irregularities and corruption are shared among the



POLICY OF AVOIDANCE OF CONFLICTS OF INTEREST

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employees. In order to implement this principle, the approval, implementation, recording and control of each activity, financial decision or transaction are assigned to different persons; and the authorities and responsibilities granted for different functions are separated from each other; and it is ensured that they are not collected in the same persons.

The company sees any violation of any article of this policy as a serious breach of the employees' obligations and punishes them with harsh disciplinary actions, including termination of employment.

Ignoring or not reporting conflict of interest when they are detected is also considered as a conflict of interest by the company.

Compliance with the policy will be considered within the scope of violation of the accounting records, financial and operational policy.

The Company's Policy for Preventing Conflicts of Interest is compulsory for the managers and employees of departments such as human resources management, trade, operations, and contracts department. However, all employees are encouraged to receive this training due to the importance the company attaches to the subject.

5. AUDIT, REVIEW AND COMPLIANCE

The audit of compliance with the provisions of this here present policy is carried out every year within the scope of internal audit.

This here present policy is reviewed periodically by the Ethics Committee according to changing conditions and all changes are announced to the employees after the approval of the Board of Directors. Regarding conflict of interest issues, you can consult the Regulatory Compliance Department using below information.

This here present policy is updated annually from its entry into force, under the coordination of the Ethics and Compliance Manager of the Company, in terms of compliance with all local and international laws which it refers to.

Other changes and revisions will be prepared by the Ethics and Compliance Committee as a result of the company's evaluations regarding the relevant risks; justified change and revision proposal will be submitted to the Board of Directors of the Company and enter into force with the approval of the Board of Directors of the Company.

The compliance with this here present policy can be measured and followed by periodic surveys and audits, compliance assessment and self-assessment tools. If you have any questions about the content or implementation of these policies, you can contact the Ethics and Compliance Manager of the Company at etik@mekemarine.com or by calling **0 544 944 63 53**.

Necessary disciplinary actions, up to the termination of the employment contract, shall be imposed within the framework of the Company's Code of Ethics and Disciplinary Regulations, in case of behaviors that are found to be in breach of the rules of this here present policy. In case the legal conditions are created, the situation is notified to the judicial authorities.

6. REVISION HISTORY

Revision Number	Revision date	Revision Description
00	31.12.2020	First publication



NOTIFICATION, ADVICE AND DENUNCIATION POLICY

Document number:
PO.5

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00

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1. OBJECTIVE AND SCOPE

The purpose of this here present policy is to explain to our employees the processes of reporting unacceptable behaviors they observe within the organization.

This here present policy covers unacceptable behaviors and the processes for reporting these behaviors.

2. DEFINITIONS AND ABBREVIATIONS

- **Advice:** It is the situation where an employee or supplier applies for obtaining information and evaluation of the Ethics and Compliance Manager in cases when such employee or supplier needs additional information about whether a business decision to be made is in compliance with the Company's Business Ethics Guide and related policies.
- **Notification:** Notification is when an employee realizes the risk of occurrence of situations that conflict with the Company's Business Ethics Guide and related policies during the natural course of the work, and when it reports such risk to the Ethics and Compliance Manager.
- **Notice:** This is the case when the employee's doubts about non-compliance with the Company's Business Ethics Guidelines and related policies, especially on issues such as misconduct, abuse or corruption within the company increase and when the employee expresses such doubt.
- **Notice Line:** It is a communication method that can be used by those who suspect or witness a non-compliance, corruption, conflict of interest or abuse, to report the incident securely.
- **Abuse:** It is the situation of deliberately making unlawful statements considering personal interests or the use of company resources by an employee for personal gain.

3. RESPONSIBILITY

The responsibility for the preparation, modification and supervision of this policy belongs to the Ethics and Compliance Committee; the responsibility for the implementation belongs to all company employees and the board of directors; and the responsibility for the approval belongs to the top management.

The management of the policy is under the responsibility of the Ethics and Compliance Manager of the Company. However, all company executives are responsible for managing the business processes included in the administrative and commercial functions for which they are responsible, in accordance with the policy.


4. POLICY

This here present policy has been put into practice to allow the employees to transmit to our company in an anonymous manner, all matters that cause them concern and suspicion and to warn all stakeholders and especially suppliers about all the existing or potential ethical risks of the company.

All whistleblowers are protected under the Company's Anti-Retaliation Policy. This protection is valid even if the claim arising from the notice cannot be verified. The aim is to ensure the continuity and security of communication and to establish the trust of all employees in the hotline.

Detection or increase in unfounded notices can only be resolved by measures such as constructive warnings and by increasing relevant training. The whistleblower will not be subject to any retaliation or punishment. However, to prevent the formation of the opinion such as that there are no sanctions applied in return for the notices, the person making subject of the notice is favored, under the condition to pay due diligence to the principle of confidentiality, ethical reports are issued by appropriate periods to ensure the confidence of all personnel in the functioning of the system.

This here present policy is designed to address concerns regarding specific issues of the public interest, which are detailed here below. Notification means a notification by an employee, supplier or contractor, internal or external

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person or organization in a reasonable manner that the following matters are currently happening, have occurred in the past or may occur in the future. The list of examples related to the aforementioned events is as follows:

- Corruption,
- Abuse,
- Conflict of Interest,
- Failure to comply with a legal obligation (suspicion of fraud, abuse of office, breach of an employment contract or failure to comply with a general legal obligation),
- Threat to the health or safety of any person,
- Harm to the environment,
- Deliberate concealment of information pointing to any of the above examples.

It may not always be comfortable to raise concerns within the company due to the possible sensitivity of the situation. If employees notice any inappropriate situation, they should report this situation to their manager.

If the non-compliance is related to the employee's senior manager, or if the senior manager has not taken any action within a reasonable time, the notification or warning is made directly to the Ethics and Compliance Manager of the Company.

Our employees may choose to make any notification or warning directly to the Ethics and Compliance Manager of the Company for any reason. In such a case, the Company's Anti-Retaliation Policy is the assurance that they will not be subject to any retaliation, pressure or sanction by their managers.

Every employee has the right to request to know the result of the notification or warning s/he has made. Even if s/he does not make this request, written information about the research result is given to the whistleblower that made the notification or the warning.

The company is obliged to protect the rights, interests and reputation of the whistleblower as well as to protect the interests and reputation of the company. All research should be conducted confidentially, taking into account this basic principle.

4.1. Unacceptable Behaviors

Unacceptable behaviors can be described as actions that may be harmful to the mission or reputation of our company or our employees, and that may arise due to the violations of the issues covered in the internal regulations, policies, circulars, directives and norms.


These behaviors include but are not limited to the following topics.

- Behaviors contrary to the Code of Ethics and Working Principles,
- Practices contrary to the Anti-Corruption Policy rules,
- Abuse and corruption reports,
- Behaviors that violate legal or regulatory obligations while performing their duties,
- Violations of the policies and procedures regarding sanctions regulations, situations that do not comply with the rules and regulations of the institution.

Reporting Unacceptable Behaviors

In order to protect the reputation of our company, all our employees are individually responsible to report any situation regarding the above-mentioned violations.

When our employees are not sure about which situations are unacceptable or not, they can report the case confidentially and anonymously to their managers or to the communication channels specified in this document. The

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confidentiality of all notifications sent to our communication channels is essential, and anonymous notifications are also taken into account in this context. The situations, in which notices and notifications are made, are evaluated according to their content and nature. As a result of this assessment, if the reported situation is subject to investigation, examination and similar actions, or in cases of operational error, risk and similar situations, reported situation is owned by the relevant administrations, is examined on the basis of confidentiality and feedback is provided.

Detection of false and/or libelous deliberate notifications or cases of not reporting or ignoring unacceptable behavior despite noticing may also be considered as a violation of the rules, and in this case, disciplinary penalties that may lead to the termination of the employment contract may be raised.

The communication channels established to report unacceptable behaviors, violations or suspicious situations that may damage the reputation of the institution stated in this here present policy are as follows:

Ethics Hotline: 0 544 944 63 53

Ethics notification e-mail address: Etik@mekemarine.com

If reporting makes the whistleblower feel disturbed, or if there are doubts about how these tools are applied to the whistleblower case, you should contact eti@mekemarine.com or call 0 544 944 63 53 or contact the Company Ethics and Compliance Manager directly.

The notifications about the Ethics and Compliance Manager of the Company or one or more of the members of the Ethics and Compliance Committee are directly forwarded to the General Manager.

Confidentiality especially in terms of identity of the whistleblowers is the basic principle in case of any consultation, notification or warning.


Information to search for in the report

The notifying or warning party should share the following information where possible:

- Summary of the detected or suspected misconduct, the identity of the parties involved,
- Details of when, where and how this misconduct occurred,
- Names of persons suspected of being involved in this misconduct (company personnel and non-company personnel),
- List of names of persons who may have relevant information,
- How information about suspected behaviors is obtained,
- Estimation of damages incurred by the company or other third parties, if any and possible,
- The place of the breach that occurred or the disruption of concern within the internal control, principle and processes,
- Suggestion regarding the actions to be taken (this article assumes that the whistleblowers making the notification or warning may also have business knowledge and technical infrastructure to make suggestions for prevention),
- Name and contact information of the whistleblower (It is reasonable and legitimate that the person who makes the notification does not want to share this information or it is possible that the notification is made unanimously. None of our personnel or stakeholders can be obliged to declare their identity),
- Preparation date and time of the notification report,

Conclusion of Unacceptable Behaviors

All necessary steps should be taken to ensure that the investigation process is fair and impartial. These steps mean obtaining written explanations of persons under evaluation about the allegations and offering opportunities to defend themselves. The person conducting the investigation process should be able to conclude the report as soon as

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possible, prioritizing the confidentiality of the person to whom the notification is made and the persons affected by the transmitted situation.

Protection of the Whistleblower

There will be no change in the seniority or titles of our employees as a result of their refusal to participate in unacceptable behavior, or as the result of notification or report of their concerns; similarly they will not be exposed to any negative situation (disciplinary punishment, dismissal, etc.) and will not be put in a disadvantaged position.

Our organization undertakes to protect the confidentiality of our whistleblowers, except in cases that require disclosure of the following situations.

- Situations where disclosure is required by law,
- Situations that require disclosure to prevent or mitigate a serious threat to a person's health or safety.

Post-Notice Process

Upon receipt of the notification or warning, the relevant process is started immediately. This process, which will proceed under the leadership and coordination of the Ethics and Compliance Manager of the Company, should be initiated within three business days, or as soon as reasonable if a preliminary preparation is deemed necessary.

As part of this process, if the whistleblower is to attend any meeting, he should be advised to be accompanied by a colleague or an authorized legal expert. The same should be done for the party against whom the notification is made. The person conducting the meeting can report the incident to other internal departments. For example, if the suspected incident is an abuse, the Human Resources Department will be informed of this incident.

Utmost care will be taken to protect confidentiality and the reputation of the parties in the management of all processes until the completion of the research. It should not be forgotten that the person to whom the notification is made is not guilty until proven otherwise due to the presumption of innocence.

Where appropriate, the whistleblower will be regularly informed about the progress of the investigation and the actions to be taken.

The purpose of the investigation;

- To determine whether a misconduct has occurred and, if so, to what extent,
- To reduce the risk of further misconduct occurring, to prevent further loss of resources and reputation, and to protect all evidence.

It is not possible to give a time limit about when the investigation will end, because the variety of possible reports makes this impossible. Most of the investigations will be conducted within the company. However, if deemed necessary, an external investigator or investigation team may be appointed.

Any personnel found to be involved in misconduct will be investigated using a disciplinary process. If the person is self-employed, temporary staff or contractor, the employment contract may be terminated. Where any crime is believed to have taken place, the incident should be reported to the judicial authorities. Investigation of the allegations is the duty of the Ethics and Compliance Manager of the Company. The manager may ask for the support of the managers and teams of departments such as internal audit, internal control, law, human resources for the effective execution of this task.

The Ethics and Compliance Manager of the Company will have the following responsibilities towards the notifying employee or party (whistleblower):



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- (Unless the notification is anonymous) To organize an official meeting with the whistleblower to discuss the incident,
- To inform the whistleblower about the right to be accompanied by a legal counselor and/or colleague in the interview,
- Informing the employee about the developments and agreeing on the timing of the steps to be taken,
- To inform the whistleblower about the outcome of the investigation, including how the situation will be resolved and whether they should attend an investigation interview,
- To provide details on current employee support mechanisms.

The Ethics and Compliance Manager of the Company will have the following responsibilities towards the whistleblower:

- To take all necessary measures to protect the privacy, personal rights and reputation of the person or persons about whom a report is made,
- To notify the person or persons about whom a report has been made in writing,
- To inform about the seriousness of the allegations and to provide supporting evidence,
- To advise in writing on the process to be followed,
- To provide the person with the opportunity to defend himself in writing and verbal manner about the allegations made and to collect and evaluate the relevant evidence,
- To inform about the right to be accompanied by a legal counselor and/or colleague in the interview,
- To provide details on current employee support mechanisms.

The Ethics and Compliance Manager of the Company may be summoned as a witness in the disciplinary meeting that follows the investigation, if necessary. When necessary, the company can provide support, consultancy or mediation services to individuals or teams subject to investigation so that business relationships can continue in the most effective way.

Data Protection and Confidentiality

All investigation and research information will be kept confidential. The identity of the whistleblower may need to be disclosed, due to the nature of the evidence, statement or explanation. In such cases, the necessary information will be given to the whistleblower before the name is announced.

If the whistleblower is required to be involved in an investigation (for example, to provide evidence), the information of the whistleblower will now be kept confidential to the extent possible, and necessary steps will be taken to prevent him or her from becoming a victim of reprisal or wrongdoing as the result of reporting.

5. AUDIT, REVIEW AND COMPLIANCE

The audit of compliance with the provisions of this here present policy is carried out every year within the scope of internal audit. In case of an unwanted notification during the year, the Ethics and Compliance Committee takes the necessary actions and decides on the notification.

This here present policy is reviewed annually under the coordination of the Ethics and Compliance Manager of the Company in terms of compliance with all local and international laws which it refers to. Other changes and revisions will be prepared by the Ethics and Compliance Committee as a result of the company's evaluations regarding the relevant risks; the justified change and revision proposal will be submitted to the top management, and the revised version will enter into force with the approval of the top management.

The compliance with this here present policy can be measured and followed by periodic surveys and audits, compliance assessment and self-assessment tools.



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If you have any questions about the content or implementation of these policies, you can contact the Ethics and Compliance Manager of the Company at etik@mekemarine.com or by calling **0 544 944 63 53**.

Necessary disciplinary actions, up to the termination of the employment contract, shall be imposed within the framework of the Disciplinary Regulations., in case of behaviors that are found to be in breach of the rules of this policy. In case the legal conditions are created, the situation is notified to the judicial authorities.

6. REVISION HISTORY

Revision Number	Revision date	Revision Description
00	31.12.2020	First publication

	POLICY ON THE PREVENTION OF RETALIATION			
	<u>Document number:</u> PO.6	<u>Issue date:</u> 31.12.2020	<u>Revision No:</u> 00	<u>Revision Date:</u> -

1. OBJECTIVE AND SCOPE

The purpose of this here present policy is to define and prevent material or moral grievances that may occur after the notification of any situation of concern that might violate our company's Code of Business Ethics.

This here present policy is applied in all offices and representation points of our company; Companies that supply goods or services are also requested to act in compliance with it.

2. DEFINITIONS AND ABBREVIATIONS

- **Retaliation:** Retaliation is the damage incurred following a whistleblower report. This retaliation may result in material or moral grievance for the whistleblower. The company tries to prevent all kinds of grievances arising from retaliation and undertakes to take necessary criminal actions in case of such behavior.

3. RESPONSIBILITY

The responsibility for the preparation, modification and supervision of this here present policy belongs to the Ethics and Compliance Committee; the responsibility for the implementation belongs to all company employees and the board of directors; and the responsibility for the approval belongs to the top management.

The management of the policy is under the responsibility of the Ethics and Compliance Manager of the Company. However, all company executives are responsible for managing the business processes included in the administrative and commercial functions for which they are responsible, in accordance with the policy.

All company employees and parties acting on behalf of the company must comply with this here present policy.

4. POLICY

Our company sets out mechanisms that prevent persons who report a corruption, an abuse, non-compliance or an irregularity from suffering material or moral damage due to such notification. Our company does not approve the retaliation for any reason.

This here present policy is a commitment to take the disciplinary action stipulated in the Disciplinary Procedure when an incident of retaliation occurs.


This here present policy is also an integral part of the Company's Business Ethics Principles.

This here present policy also serves as a guide for all persons, institutions and organizations (suppliers) with which our company has a relationship of supplying goods or services.

This here present policy states that ;

- It will ensure that all employees feel supported to report on matters of concern in an anonymous manner, and to report incidents suspected to be inaccurate, unethical or inappropriate.
- It will provide assurance that all reports will be examined, that the confidentiality will be considered with importance and that the possibility of retaliation will be reduced.
- If there is retaliation, the whistleblower will be compensated.
- The employee who retaliates will be subject to necessary punishment.

In its Notification and Denunciation Policy, the Company makes a commitment to keep confidential the identity of all whistleblower as long as possible. This principle of confidentiality is a measure taken to protect the whistleblower against the possibility of retaliation. At the same time, it undertakes that the whistleblower will not be subject to any penalty for the report and will protect the whistleblower against any reprisals that may be made due to the report.

	POLICY ON THE PREVENTION OF RETALIATION		
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4.1. Confidentiality of the Whistleblower's Identity

Considering that the notifications made within the scope of the Consultation, Notification and Denunciation Policy may be related to highly confidential and sensitive issues, it may be preferable to keep the names anonymous in the reports made for this purpose. In such a case, all facilities will be used to investigate the whistleblower's suspicions, but the completion of the investigation may be interrupted if no further information is available from the whistleblower. Hiding the identity of the whistleblower is a decision taken to prevent the occurrence of retaliation. Even if a whistleblower makes a report without hiding his/her identity; our company will keep this identity confidential as long as possible.

If the report is not anonymous and a statement from the whistleblower is required during the investigation, the whistleblower is informed about the right to be accompanied by an external advisor (attorney or trade union official) during the interview. This legal advisor can also assist the whistleblower if s/he encounters retaliation.

4.2 Protection of the Whistleblower during the Post-Notice Investigation Process

Our company undertakes that the whistleblowers will not be harmed in any way within the scope of the Consultation, Notification and Denunciation Policy.

4.3. What to Do in Case of Retaliation

If the whistleblower believes that s/he has suffered a victimization or damage by a person within the company due to giving a clear notice or supporting an investigation carried out under this here present policy; s/he should immediately inform the Ethics and Compliance Manager. In this case, the company will take necessary measures to protect him/her from any retaliation.

The employee will be protected and an investigation will be initiated concerning the possibility of retaliation. During the investigation; if the victimization is moral (e.g. worsening the work environment) necessary corrective measures will be taken. If the victimized employee is unfairly dismissed, the company will recall this employee to resume his/her work as soon as retaliation suspicion is indicated.

Employees who are proven to have retaliated will be subjected to disciplinary action pursuant to the Staff Handbook.

5. AUDIT, REVIEW AND COMPLIANCE

The audit of compliance with the provisions of this here present policy is carried out on yearly basis under the scope of an internal audit. In case an unwanted notification occurs during the year, the Ethics and Compliance Committee takes the necessary actions in order to decide about the notification.

This here present policy is reviewed once a year, under the coordination of the Ethics and Compliance Manager of the Company, with regards to its compliance with all national and international laws which it refers to. Other changes and revisions will be issued by the Ethics and Compliance Committee as a consequence of company's evaluations regarding relevant risks; justified change and revision proposal will be presented to the top management, and the revised version will enter into force following the approval of the top management.

The compliance with this here present policy can be measured and followed by periodical surveys and audits, compliance assessment and self-assessment tools.

If you have any questions about the content or implementation of these here present policies, you can contact the Ethics and Compliance Manager of the Company at etik@mekemarine.com or by calling **0 544 944 63 53**.

Necessary disciplinary actions, up to the termination of the employment contract, shall be imposed within the framework of the Disciplinary Regulations., in case of behaviors that are deemed to be in breach of the rules of this here present policy. In case the legal conditions are created, the situation is notified to the judicial authorities.



POLICY ON THE PREVENTION OF RETALIATION

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6. REVISION HISTORY

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	CHILD LABOR, FORCED LABOR AND YOUTH EMPLOYMENT POLICY			
	<u>Document number:</u> PO.7	<u>Issue date:</u> 31.12.2020	<u>Revision No:</u> 00	<u>Revision Date:</u> -

1. OBJECTIVE AND SCOPE

The purpose of this here present policy is to clearly and exactly state the principles, commitments, demands and attitude of our company on the prevention of child labor, prevention of forced labor and promotion of youth employment.

This here present policy covers the legitimate framework to be respected in terms of preventing child labor, preventing forced labor and promotion of youth employment as well as work rules for child labor and the expectations of suppliers and subcontractors all around the world. The policy is applied in all locations of the company.

2. DEFINITIONS AND ABBREVIATIONS

- **Child worker:** A person who has completed the age of fourteen but has not completed the age of fifteen and has completed his/her primary school education.
- **Young worker:** A person who has completed the age of fifteen but has not completed the age of eighteen.

3. RESPONSIBILITY

The responsibility for the preparation, modification and supervision of this here present policy belongs to the Ethics and Compliance Committee; the responsibility for the implementation belongs to our company and other companies that have business relations with us; and the responsibility for its approval and follow-up belongs to the top management.

The management of the here present policy is under the responsibility of our Sales team, Purchasing team and Ethics and Compliance Manager of the Company.

4. POLICY


Our company develops procedures and practices in accordance with all local laws, United Nations International Labor Organization standards and international agreements on child labor, forced labor and youth employment, either in Turkey or in all other countries where it does business, is represented or it directs operations.

If a country's local laws fall below ILO standards or the principles set out by this here present policy, the principles set out in the ILO or Company Child Labor, Forced Labor and Youth Employment Policy will apply.

None of the clauses of the policy conflict with the relevant laws that the company is subject to and does not alleviate the liability of the employee who is involved in the corruption and causes the corruption.

Labor legislation has also regulated the working conditions of children and young workers in order to ensure the health and safety, physical, mental, moral and social development of children and young workers, to allow them to continue their education and to prevent their economic abuse.

- In any country where the company conducts business operations, the principles and conditions of this policy are applied even if the young worker age is less than fifteen, which is the age set in this here present policy.
- In any country where the company conducts business operations, if the age of young workers is above fifteen, which is the age set in this here present policy, and/or if the working conditions and standards for young labor demand more requirements and higher standards than this here present policy, the standards that are ordered by local law are applied.
- Light job, based on its structure and nature and according to the special conditions endured during its performance;
 - Is a job that does not contain the possibility of detrimental effects on the development or health and safety of young people.


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- Is a job that does not prevent school attendance, vocational training, or participation in and benefit from the training program that is approved by competent authorities.
- Daily working hours of young workers are applied in a twenty-four-hour period, taking into consideration uninterrupted resting period of fourteen-hour.
- Young workers cannot be employed under any circumstances, if the executed work falls under "dangerous job" class.
- Dangerous jobs are jobs for which no one under the age of eighteen cannot work and which involve following risks:
 - Jobs that are at risk of physical, psychological or sexual abuse of the employee,
 - Jobs performed underground, under water, at dangerous heights or in narrow and confined spaces,
 - Jobs requiring the use of dangerous machinery and vehicles,
 - Jobs requiring heavy load and material transportation,
 - Jobs that are open to substances that may be hazardous to health,
 - Jobs exposed to high vibration, heat or sound.
- Forced labor is a situation where a person is deprived of his/her legal rights without his/her consent, in return for a penalty, and without being recorded. The fact that a certain amount of compensation is paid does not affect the definition of the forced labor.
- Examples of forced labor situations:
 - Employment by burden of debt,
 - Creating situations where the person does not have the right to refuse to work,
 - It covers cases where the contrary is not determined by a court decision and where prisoners or convicts are employed without being under the special supervision of a public authority.

The basic principles of our company's Child Labor, Forced Labor and Youth Employment Policy are as follows:

- Our company develops procedures and practices in accordance with all local laws, United Nations International Labor Organization standards and international agreements on child labor, forced labor and youth employment, either in Turkey or in all other countries where it does business, is represented, or it directs operations.
- Our company does not allow child labor and forced labor, and does not tolerate such practices by its suppliers.
- Our company allows the employment of young people provided that their working hours do not exceed the hours determined for working hours of young people, that they work part-time or full-time, in light-duty jobs that will support the professional development of the young worker.
- Young workers or trainees working for the company or its suppliers must be duly registered as required by local law.
- It is obligatory to allow the young worker a break of thirty minutes for jobs lasting more than two hours and less than four hours, and one hour in the middle of the working period for jobs from four hours to seven and a half hours.
- All our suppliers employing young workers are required to comply with the standards specified in this here present policy.
- In case of any practices contrary to the principles and standards of this here present policy, business relationship with the supplier in subject shall be terminated.
- The company expects its suppliers to apply the principles and standards set forth in this here present Policy while selecting and working with their suppliers.

Our company requests its suppliers and subcontractors all over the world to comply with the principles, terms and standards of this here present policy and to develop procedures in line with this here present policy. Accordingly, all

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current and future commercial contracts between suppliers and subcontractors and our Company will contain articles and commitments of the following principles:

- Child labor and forced labor are strictly prohibited, and the contract is terminated upon detection of such labor.
- The supplier or subcontractor undertakes that it understands the principles, standards and conditions of the "Company Child Labor, Forced Labor and Youth Employment Policy", that it will not employ child labor, will not use forced labor and will comply with the existing national legislation and the principles of this here present policy in youth employment.
- While the supplier or subcontractor company produces goods or services to our company, in the actual situation or in the future, it undertakes that it will not employ child labor and young workers will not be employed in jobs that are classified as dangerous work, whether they are registered or not on their payroll or a supplier's, subcontractor's payroll.
- While the supplier or subcontractor company produces goods or services to our company, in the actual situation or in the future, will not employ persons, employed in conditions defined as "forced labor" situation in the local and international law in the Company Child Labor, Forced Labor and Youth Employment Policy, such as convicts and victims of human trafficking, who are or are not registered on their own payroll or the payroll of a supplier or a subcontractor.
- The supplier or subcontractor acknowledges that these commitments are mandatory terms for a mutual employment contract.
- The supplier or subcontractor agrees to ensure that our company is not harmed and compensated for possible damages from legal liabilities that occur as a result of the violation of the relevant laws and regulations or the breach of company policies by the suppliers of goods and services.
- The supplier or subcontractor will be warned by our company if the violation of the relevant laws and regulations or our company's policies and principles is determined by our company, and in this case, the violation in subject must be terminated. Our company may terminate the existing contract immediately if it determines that the supplier or subcontractor has not terminated the violation.

5. AUDIT, REVIEW AND COMPLIANCE

The audit of compliance with the provisions of this here present policy is carried out on yearly basis within the scope of internal audit. In case of an unwanted notification during the year, the Ethics and Compliance Committee takes the necessary actions and decides on the notification.

This policy is reviewed once a year under the coordination of the **Ethics and Compliance Manager of the Company** with regards to its compliance with all national and international laws which it refers to. Other changes and revisions will be issued by the Ethics and Compliance Committee as a consequence of company's evaluations regarding relevant risks; justified change and revision proposal will be presented to the top management, and the revised version will enter into force following the approval of the top management.

The compliance with this here present policy can be measured and followed by periodical surveys and audits, compliance assessment and self-assessment tools.

If you have any questions about the content or implementation of these here present policies, you can contact the Ethics and Compliance Manager of the Company at etik@mekemarine.com or by calling **0 544 944 63 53**.

Necessary disciplinary actions, up to the termination of the employment contract, shall be imposed within the framework of the Disciplinary Regulations., in case of behaviors that are found to be in breach of the rules of this policy. In case the legal conditions are created, the situation is notified to the judicial authorities.

6. REVISION HISTORY

Revision Number	Revision date	Revision Description
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CHILD LABOR, FORCED LABOR AND YOUTH EMPLOYMENT POLICY

Document number:
PO.7

Issue date:
31.12.2020

Revision No.:
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Revision Date:
-

00	31.12.2020	First publication



FITNESS FOR DUTY AND ALCOHOL ABUSE POLICY

Document No:
PO.8

Release Date:
31.12.2020

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00

Revision Date:
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1. OBJECTIVE AND SCOPE

The objective of this policy is to ensure employees are fit to perform their assigned tasks safely and reliably.

This policy applies to the company operations for all employees when they are at work, traveling to and from sites or locations, conducting business on behalf of or representing the employer, and/or attending employer-sponsored events, regardless of the location.

2. DEFINITIONS AND ABBREVIATIONS

- **Fatigue:** Is more than feeling tired or drowsy. It is an acute and/or ongoing state of tiredness that leads to mental or physical exhaustion and prevents people from functioning within normal boundaries.
- **OHS:** Occupational Health and Safety

3. RESPONSIBILITY

The responsibility for preparation and revision of this policy belongs to human resources, the responsibility for implementation of this belongs to human resources and all our personnel and the responsibility for supervision and approval of this belongs to senior management.

4. PRACTICE

Alcohol, drugs and medications, personal problems and extreme fatigue can limit the ability of employees to perform their work in a safe and productive manner and can have serious negative effects on the health and safety of the employee and others. These negative effects can be identified as follows:

- Mental impairment problems (poor hand-eye coordination, loss of judgment, imagination, and creativity)
- Security and safety problems (breakage, thefts, injury to self and others)
- Human resource problems (absenteeism, high turnover rate, premature disability, and increased ill time)
- Public relations problems (impaired consumer image, demoralization of the work force)

This policy is prepared to decrease these problems and to provide an environment that is safe and with few risks. The fitness for duty policy stipulates that all employees assume responsibility to report to work in a fit condition and perform their jobs without increasing risk to themselves and others.

Fitness for duty may be questioned through observations of an employee's behaviours or physical symptoms, or through self-disclosure. As a result, the individual may be subject to appropriate medical examination and testing, which shall include, but not be limited to, drug and alcohol screening. If a supervisor reasonably suspects that a particular employee is unfit for duty, that supervisor must consult with Human Resources or if needed, the nearest healthcare organization prior to sending the employee for any testing.

Observations may include but are not limited to the following:

- That the individual is or may be unable to perform his or her duties or responsibilities.
- Inappropriate behaviour that may diminish co-workers' confidence in the individual's ability to perform his or her job satisfactorily.
- Behaviour generally associated with impairment including: appearance of confusion, uncontrollable outbursts, threatening gestures or speech, boisterous speech, drowsiness, staggering, dilated pupils, etc. and can include an odour of alcohol (Note: These may be symptoms of a non-intoxicated condition and should be evaluated with caution.)
- Listed below are examples of such behaviour and performance that may provide a basis for fitness for duty testing; however, they are not to be considered as all-inclusive:

- × Confusion regarding duties or work schedule



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- * Inability to complete coherent written documents or reports
- * Changing or irregular work habits
- * Documentation errors or missing documentation related to controlled substances
- * Failure to comply with and document related policies and procedures
- * Difficulty understanding or remembering directions
- * A pattern of employee complaints regarding behaviour or performance
- * Verbal or physical threats
- * Involvement in the unauthorized use, sale, possession, diversion or delivery of a drug while on or off duty.
- * Arrest or criminal charges of possession, sale, use or delivery of a drug, or of consumption of alcohol.
- * Involvement in an accident, safety-related incident or a poor work related accident record when reviewed with regard to type, frequency, and severity.
- * Direct observation of alcohol or drug use
- * Evidence that an employee has tampered with a previous drug test
- * Other information that upon review and investigation creates reasonable suspicion.

Even if there is no doubtful observation on employees, employee health checks are carried by workplace doctor in MEKE every year, regularly.

4.1. Observation and Process Management

A supervisor, who personally observes behaviour possibly indicating a lack of fitness for duty or reasonable suspicion, should immediately find another reliable witness such as another supervisor or manager to observe/witness the behaviour. A “supervisor” is an employee with supervisory or managerial responsibilities who assigns work and contributes to hiring, dismissal and performance appraisal. In cases of imminent danger, the supervisor should send for such witnesses while immediately seeking out the involved employee.

A non-supervisory employee observing behaviour indicating a possible lack of fitness for duty (defined above) on the part of a company employee on work areas must report it immediately to:

- The supervisor in the area of the facility where the incident occurred
- The supervisor of the person who appears to be evidencing unfit behaviour
- The observer’s supervisor, whoever seems most appropriate and expedient

When there are objective signs as assessed by the supervisor or manager that he/she may not be fitness for duty, the supervisor or manager then approaches the employee, escorts the employee to a quiet confidential area, and discusses the observed behaviour and the need for him or her to be further evaluated. This interview should take place as soon as possible after observing the questionable behaviour. It is important to act decisively. If it is determined that an employee is not fitness for duty, employee will not be permitted to work and will be sent home without pay for the duration of his or her shift. In such a case, a manager or supervisor will ensure that the employee leaves the work site and has a safe method of transportation. The supervisor or manager is to contact Human Resources as soon as possible

The employer reserves the right to require an employee submit to a medical assessment, which may include alcohol and/or drug testing by an approved and accredited third party medical and testing authority. The contract of employment is terminated for the employee who do not accept alcohol and drug testing. In addition, where an employee has been deemed not fitness for duty, the employer may require a medical assessment by a treating physician satisfactory to the employer prior to returning the employee to the workplace.

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4.2. Self-Disclosure

When an employee voluntarily self-discloses, firstly the supervisor or manager observes whether or not the employee appears to be currently unfit for duty. If employee appears to be unfit, proceed with the standard fitness for duty testing process.

If employee does not appear to be unfit or cannot be observed (because he/she is not on duty), the employee must be referred to healthcare organization for assessment and referral for treatment and is not permitted to return to work until released by a treating provider. In all cases the supervisor is to contact Human Resources as soon as possible.

4.3. Alcohol and Drug Abuse

The following rules are applied to prevent effects of alcohol and drug abuse on working life.

- It is not permitted for employee to drink or be under the influence of alcohol whilst on duty.
- It is not permitted for employee to drink alcohol in a public place whilst wearing a MEKE identification badge or uniform.
- All members of employee should note that drinking alcohol before work and during meal breaks can impair performance. The supervisor is asked to note that there is a perceived link between the smell of alcohol on the breath of employee and incompetence. Such perceptions can damage customer confidence in company services. It is therefore advisable that employee should not consume alcohol before coming on duty.
- If an employee consumes alcohol and acts contrary to this policy in the workplace, Occupational Health and Safety advice may be sought to assess the individuals' fitness for duty. Non-compliance with the referral may lead to disciplinary action.
- If an employee is intoxicated, under the influence of drugs, or showing behaviour that indicates they will be placing themselves and others at risk at work they will be sent home immediately. The supervisor or manager should ensure that the employee will be able to reach home safely and where required should arrange a lift. In addition, the possession of illegal drugs with the intention to use and trading is illegal and should be reported to the police.
- Employee is also reminded that alcohol consumption and drug use outside of work leading to hangovers can also be detrimental to performance at work.
- Employee who are required to drive as part of their duties or required to drive clients/service users as part of their duties should not consume alcohol before coming on duty or while on duty. Employee is reminded that the traffic laws makes it illegal for any person to drive or attempt to drive a motor vehicle while unfit to drive through the use of a substance (this includes prescribed and over-the counter medication, as well as illegal drugs and alcohol); and this is likely to result in the involvement of the police.
- Furthermore, if an employee is subject to a driving ban and has their driving licence revoked due to drink driving offence, even if this occurred outside of work, then they could be subject to the disciplinary procedure and are not guaranteed temporary redeployment.
- Occupational Health and Safety will see employee who have been referred by their supervisor or manager and will normally liaise with organization which should arrange treatments as necessary, involving specialists in the management of alcohol or drug misuse.
- Occupational Health and Safety will monitor the individual's progress whilst they are off sick and liaise with the supervisor or manager and a human resources advisor to facilitate their return to work.

4.3.1. Types of testing

All employees, contractors and suppliers are required to undertake drug and/or alcohol testing in line with this policy and the below types of testing.



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Tests	Explanation
Alcohol	Breath testing may be conducted by trained specialists using suitably calibrated devices.
Drug	Initial saliva drug testing and confirmation tests may be conducted by a third party provider determined by company.
Reasonable Cause	If a colleague, health and safety representative, supervisor/manager or other employee suspects that someone may be impaired as a result of drugs and/or alcohol then the relevant representative should use the impairment assessment checklist (Appendix 1) and process flow chart below to ascertain whether it is reasonable to undertake a drug and/or alcohol test.
Post Incident and Near Miss	Any incident that is reportable to company may result in the person/s involved in this incident being subject to drug and/or alcohol testing.
Voluntary	If an individual is concerned that they may be impaired and unable undertake their duties due to being under the influence of drugs and/or alcohol they should alert their supervisor/manager. That person may be provided access to the testing program to ascertain their fitness for work. Alternatively, employees may consult with their treating doctor to obtain a fitness assessment; in the event that the employee chooses to meet with their treating doctor they will not be paid for this time or may use their personal leave.
Rehabilitation	Individuals who return a confirmed positive test, in excess of the prescribed levels may be subject to an increased frequency of testing. This increased frequency applies once the employee returns to work and has provided a negative test result. Up to 3 additional tests may occur for a period of up to 6 months post any return to work in order to support their rehabilitation and successful return. Such tests would be scheduled randomly during this period and undertaken in line with alcohol and/or drug testing types specified above.
Pre-Employment	Some candidates may be required to undertake pre-employment drug and/or alcohol testing as a part of the recruitment process. The decision on which roles this applies to is at the sole discretion of company management. Factors when deciding which roles to test may include but not be limited to the level of responsibility of the role and the amount of high risk work which is undertaken in the role.

4.3.2. Witness during testing or assessment

Employees, suppliers or contractors cannot be reasonably refused a request to have a witness present when being subject to either a drug/alcohol test and/or impairment assessment. Employees, suppliers or contractors cannot reasonably refuse a request for the person undertaking the testing to have a witness present when undertaking a drug/alcohol test and/or impairment assessment.

4.3.3. Investigations and disciplinary action

The focus of this policy is the wellbeing of all employees. However, where breaches of this policy are suspected matters may be investigated. Employees found in breach of the policy may be subject to disciplinary action up to and including the termination of employment.

Factors that may be taken into consideration when deciding on the level of disciplinary action may include but not be limited to;

- The behaviour and conduct of the employee (both at the time of the incident and during any subsequent investigation and meetings)
- The level of intoxication and/or refusal to be tested
- The severity of the hazard or risk of the incident
- The level of disclosure of the employee
- The employee's willingness to engage in rehabilitation
- Previous breaches of the policy.



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Employees will not be permitted to return to work until a medical clearance (i.e. negative drug and/or alcohol test result) is provided. Employees will be stood down on unpaid leave until such clearance is provided or they agree to and provide a negative test result.


A meeting may then be arranged between the person and the relevant manager and/or OHS representative to discuss the matter and reach an outcome in terms of any disciplinary action that may occur.

5. ANNEXES

- F.25.17 Impairment Assessment Checklist Form

6. REVISION HISTORY

Revision Number	Revision Date	Revision Description
00	31.12.2020	First Release

	KPI POLICY		
	<u>Document No:</u> PO.9	<u>Date Issued:</u> 31.12.2020	<u>Revision No:</u> 00

1. PURPOSE AND SCOPE

The purpose of this document is to establish the policy and procedures to be followed by MEKE in management reporting to ensure that contractual requirements are achieved, and to implement a proactive internal and external management reporting system and to identify the Key Performance Indicators (KPI's) to be used to monitor performance.

This document covers the requirements associated with the reporting issues and Key Performance Indicators.

2. DEFINITIONS AND ABBREVIATIONS

- **Incident:** An event that resulted in the injury or illness of a person requiring lost time, medical treatment, first aid or non-treatment.
- **Near Miss:** An event that, while not causing harm, has the potential to cause injury or ill health.
- **Fatal:** Work-related death.
- **Remedial Action:** A remedial action is intended to correct something that is wrong or to improve a bad situation.
- **Toolbox Talk:** A toolbox talk is an informal safety meeting that is part of an organization's overall safety program.
- **Lost time:** Any work-related injury or illness that results in a fatality, permanent disability or time lost from work of one day/shift or more, as prescribed by a medical practitioner.
- **DAFWC:** DAFWC is the abbreviation of days away from work cases.
- **HSE:** HSE is the abbreviation of health, safety and environment.

3. RESPONSIBILITY

The responsibility for preparation and revision of this policy belongs to human resources, the responsibility for implementation of this belongs to human resources and all our personnel and the responsibility for supervision and approval of this belongs to senior management.

4. REPORTING

It is a MEKE requirement that all personnel regardless of position will be responsible for reporting both pre-determined parameters and any exceptional items such as safety or environmental issues.

4.1 INTERNAL REPORTING


There is a clear reporting structure to the Deputy Managers along with and upward to the Superintendent where appropriate. Employees are formally informed of this during their induction briefing and through their specific job description.

Weekly Operational Reports

The Deputy Manager provides a weekly report to the General Manager. The Weekly Report is in two parts, first part is being a review of the previous week and second part is being a work plan for the upcoming week. The work plan is to be submitted by close of routine business on each Friday. In addition to this routine reporting, the Deputy Manager is to submit Accident, Near Miss or System Improvement reports as and when they are prepared.

Monthly Operational Reports

In addition to the weekly reports, the Deputy Manager provides a Monthly Report to the General Manager. This report is a roll up of the previous weekly reports and is required to enable the General Manager to prepare the monthly

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client report in addition to an internal evaluation of performance. The Monthly Report is to be submitted by close of routine business on the last working day of each month.

4.2. CLIENT REPORTING

MEKE reports to client on a regular basis in accordance with the contract requirements. The report is in a monthly, quarterly and annual basis.

4.2.1. MONTHLY REPORTS

The MEKE General Manager submits a monthly report to the client. The monthly report covers activities in the subject month and also where appropriate contain a running total to date. MEKE submits the report to client by the close of business on the fifth working day of the following month. The format of this report is the same as that completed by each Deputy Manager.

4.2.1.1 REPORT COMPONENTS

The primary components of this monthly reporting system are shown below.

HSE Performance report


- Executive summary.
- Number of days worked.
- Number of fatalities (KPI).
- Number of recordable injuries (KPI).
- Number of days away from work (DAFWC).
- Number of near miss incidents.
- Number of road accidents.
- Number of kilometers driven.
- Number of hydrocarbon spills (KPI).
- Number of toolbox talks (KPI)
- HSE issues.
- HSE theme for month.

Quality report

- The number of System Improvement Requests (KPI) with a brief narrative of the request.
- The number of Customer Complaints (KPI) along with a brief narrative of the complaint.
- A summary of audit work undertaken (KPI).
- A summary of any remedial actions.

Operations report

- The number of times personnel were called out and the number of occasions when this was out with the contracted response time (KPI).
- The number of times equipment was mobilized and the number of occasions when this was out-with the contracted mobilization time (KPI).
- Status of oil spill response depots, equipment, boats and vehicles, repairs, items out of service and maintenance completed.
- The number of incidents complete with a brief synopsis of the incident and the lessons learned. In the event of an incident occurring then a separate Incident Report Form will be completed and attached to

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the monthly report. This includes details of the incident, response personnel utilized, equipment utilized and lessons learned.

- The number of exercises complete with a brief synopsis of the exercise and the lessons learned. A separate Exercise Report Form will be completed and attached to the monthly report. This includes details of the exercise scenario, objectives, participants and the lessons learned.
- The number of days spent on training (KPI) complete with a brief synopsis of the training, themes, topics covered and participants.

Forward Planning Summary

- This report includes the details of forthcoming significant events and includes planned exercises, training, vacation and or departing MEKE and any other significant diary event

4.2.2. QUARTERLY REPORTS

MEKE prepares an enhanced report for each quarter which i which covers the activities of quarter and a cumulative report of figures to date. The Quarterly Report replaces the Monthly Report and be submitted to client by the close of business of the tenth working day of the following month.

The primary components of this quarterly reporting system are as follows.

HSE Performance Report


- Executive Summary
- Number of days worked
- Number of fatalities (KPI)
- Number of recordable injuries (KPI)
- Number of days away from work (DAFWC)
- Number of near miss incidents
- Number of road accidents
- Number of kilometers driven
- Number of hydrocarbon spills (KPI)
- Summary of number of toolbox talks (KPI)
- HSE Issues
- HSE theme for month

Quality Report

- The number of System Improvement Requests (KPI) with a brief narrative of the request.
- The number of Customer Complaints (KPI) along with a brief narrative of the complaint.
- A summary of audit work undertaken (KPI).
- A summary of any remedial actions.

Operations Report

- The number of times personnel were called out and the number of occasions when this was out with the contracted response time (KPI)
- The number of times equipment was mobilized and the number of occasions when this was out-with the contracted mobilization time (KPI).
- Status of personnel/ manning levels, oil spill response depots, equipment, boats and vehicles, repairs, items out of service and maintenance completed.

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- The number of incidents complete with a brief synopsis of the incident and the lessons learned. In the event of an incident occurring then a separate Incident Report Form will be completed and attached to the monthly report. This includes details on the incident, response personnel utilized, equipment utilized and lessons learned.
- The number of exercises complete with a brief synopsis of the exercise and the lessons learned. A separate Exercise Report Form will be completed and attached to the monthly report. This will detail the exercise scenario, objectives, participants and the lessons learned.
- The number of days spent on training (KPI) complete with a brief synopsis of the training, themes, topics covered and participants.

4.2.3. ANNUAL REPORTS


MEKE prepares an annual summary report prior to the end of each annual review period. This report is the base document for the annual contract review. The report includes all of the pertinent information from the previous twelve months. This summary document replaces the quarterly report for that period and MEKE submits it to client by the close of business on the tenth working day of the following month.

5. ANNEXES

- F.25.20 Quarterly KPI Report Form

6. REVISION HISTORY

Revision Number	Revision Date	Reason for Revision
00	20.06.2020	First publishing

	SAFE DRIVING POLICY			
	<u>Document No:</u> PO.10	<u>Release Date:</u> 31.12.2020	<u>Revision No:</u> 00	<u>Revision Date:</u> -

1. PURPOSE AND SCOPE

The purpose of this document is to specify the requirements for safe land transport in all operations of Meke.

This document includes responsibilities of staff involved in land transport operations, standards and other relevant general procedures of land transport.

2. ABBREVIATIONS

- **ETA:** Estimated time of arrival.
- **ETD:** Estimated time of departure.
- **MPV:** Multi purpose vehicle
- **JMP:** Journey management plan.

3. RESPONSIBILITY

The responsibility for preparation and revision of this policy belongs to human resources, the responsibility for implementation of this belongs to human resources and all our personnel and the responsibility for supervision and approval of this belongs to senior management.

4. EMPLOYEE RESPONSIBILITIES

All employees are required to follow all applicable laws, policies, and regulations. The responsibility for successful journey management is shared between MEKE management and the journey participants. The responsibilities are as follows.

4.1 AUTHORIZED MANAGER

The Authorized Manager is the Operations Manager at main office and highest level manager at worksites and bases. He / she maintains overall responsibility for the execution of the journey management plan.

The following specific responsibilities are the primary functions performed by the Authorized Manager:


- Provide sufficient resources to ensure implementation of this procedure and monitor outcomes
- Solicit feedback on the effectiveness of the plan and ensure that any concerns are identified and resolved.
- Provides verbal approval for all Journey Management Plans prior to implementation.
- Ensure that the drivers are competent.
- Ensure that the driver's hours of work are not exceeded.
- Ensure that the driver informs the destination of their journey inclusive of the ETA and reports back to the point of origin upon destination arrival.
- Acts as or designates a supervisor as the dispatcher and monitors the journey through its completion.
- Initiation of Lost Man procedures as necessary.
- Maintaining necessary journey management records and documentation.

4.2. DRIVER(S)

The drivers are responsible for the completion of the Journey Management Plan, its execution, and the safety of themselves, their passenger(s), loads and their vehicle. The driver must comply with all requirements of this policy and exercise good judgment and care while driving. Only authorized, trained and qualified employees will operate a motor vehicle.

Prepared by Human Resources Manager	Checked by Integrated Management Representative	Approved by General Manager	Page 1 / 13
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The following specific responsibilities are carried out by the driver:

- Obtain approval for the journey and the associated Journey Management Plan (JMP).
- Contact passengers to confirm journey details.
- Contact the destination (if another MEKE business) and ensure a copy of the Journey Management Plan is forwarded and received.
- Perform a Vehicle Safety Check and fill out the “Vehicle Safety Check Form” (see appendix 1).
- Ensure the safety equipment is on-board and functional.
- Drivers must wear seat belts at all times when driving and they must ensure that all other vehicle occupants are also wearing their seat belts prior to vehicle movement. Seatbelts must be worn in a fashion consistent with the original design.
- Ensure communications equipment is working properly.
- Ensure a copy of the JMP is in the vehicle along with an up-to-date map and directions.
- If available install the navigator system and ensure it is working properly.
- Follow only the authorized route and timing.
- Observe speed limits and other road signs.
- Reporting to the designated dispatcher every two (2) hours as to the status of the journey and passengers with the check call.
- Appropriate rests according to section 6.3 “Hours Of Driving” should be given to walk around, stretch, and check the vehicle and load if applicable.
- Be physically and mentally fit, paying particular attention to past hours worked, past amounts of sleep, time of the day, position in the natural alertness cycle, food intake, etc.
- Driving a vehicle while under the influence of alcohol, drugs, or narcotics, is strictly prohibited and subject to disciplinary action including termination of employment.
- The use of a cell phone without a hands free device or vehicle’s audio’s bluetooth system while driving is strictly forbidden.
- Driving above the posted speed limit is prohibited.
- Reporting to the dispatcher and destination of any necessary deviations in the planned journey.
- Drivers are responsible for ensuring that their training, certifications and licences (both internal and external) are up to date.
- Ensure vehicle is parked in stable condition.
- Contacting the journey origin dispatcher upon arrival at the destination.
- Reporting to appropriate management of defective equipment, vehicle or road conditions, or behavior of the passenger(s) that caused or could have caused problems during the journey.

4.3 PASSENGER(S)

Passengers also have a responsibility for vehicle safety and a safe journey. They are not merely passengers, also supporters of the driver and participants in the journey. The passenger’s behavior encourages the driver to drive safely or can adversely affect the driver’s performance.

Before starting a journey, passenger(s) must:

- Be on time to avoid rushing the driver.
- Ensure that the vehicle has received a pre-use inspection.
- Confirm that the safety equipment is in place.
- Confirm that the driver has a Journey Management plan that includes rest breaks.

During the course of the journey, passenger(s) must:

- Always fasten seat belts.



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- Always secure cargo.
- Do not distract the driver.
- Do not sit on the middle of the back seat.
- Do not smoke in the vehicle.
- Provide clear directions to the driver if required.
- Assist the driver when parking and maneuvering in hazardous locations.
- Stay alert during entire trip and support driver to ensure driving safety. Passengers also have the responsibility to correct the driver should they drive in an unsafe manner Warn the driver if he/she is traveling too fast for road/weather conditions or demonstrates non-compliance with the “Specific Procedures” described in Section 6.
- Passengers should also report any defective equipment, vehicle or road conditions, or behavior of the driver outside the “Specific Procedures” described in Section 6 to the responsible manager.
- Must acquire proper credentials for travel (Government identification, valid driver’s license or passport)

5. STANDARTS


5.1. REGULATORY STANDARTS

As Meke located in Turkey, MEKE’s Safe Driving Policy is developed to comply totally with Turkish Highway Code (Law number 2918, dated 13/10/1983).

In case of business associations outside Turkey, related nation’s Highway Code should be adapted and those codes have higher priority than MEKE’s Safe Driving Policy..

5.2 DRIVER STANDARTS

- All drivers must have undertaken a government approved driving test and possess a legitimate vehicle driving license for the type of vehicles to be used.
- All drivers must have an annual medical assessment in accordance with Turkish Driver Medical Standard.
- All drivers must undergo defensive driving training by an approved instructor before driving a company owned or leased vehicle. They must pass the assessment to be allowed to drive a MEKE owned or leased vehicle.
- All employees who are required to drive on MEKE business must complete an advanced driver training course in addition to the defensive driving course prior to driving on MEKE business.
- All professional drivers hired by MEKE must have a minimum of three (3) years of driving experience in a professional driving capacity and have a pre-employment driving assessment.
- In case of transport contractors are hired, contractors must have a pool of qualified drivers for rotation so that each driver can get sufficient rest and take annual leave.

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5.3 VEHICLE STANDARTS

MEKE has business associations requiring different types of vehicle to be used according to business or project needs. The vehicle definitions and standards are grouped as follows;

Light vehicles

Any vehicle in the segment of compact car and MPVs that has an unloaded weight of less than three and half (3.5) tones. Mostly intended to passenger transportation.

The following minimum standards should be applied when purchasing or leasing light vehicles:

- Anti-lock Breaking System (ABS),
- Air bags (including passenger side),
- Safety belts for all seats fat ront and back. Retrofitted belts should be the same type supplied by the vehicle manufacturer.
- Head restraints fitted to all seats,
- All windows (doors, windscreen, rear of cabin) will be fitted with non-splintering safety glass that provides unimpaired vision i.e. no cracks etc.,
- All pedals i.e. clutch and brake shall be fitted with rubber pads to prevent slippage,
- Doors and locks shall be fully operable,
- All vehicles to carry snow chain in winter season,
- All vehicles to carry a first aid kit and torch,
- All vehicles must be fitted with a dry powder fire extinguisher,
- All vehicles must be equipped with winter and summer type of tyres and should be replaced according to the season.

Minibuses and Buses

There are minibuses of various capacities, some with twenty four (24) seats, and large buses available that are equipped with safety equipment including seat belts fitted to all seats. When purchasing, hiring or leasing these types of vehicles they should meet the standards for light vehicles where possible with the exception of air bags. ABS should be fitted wherever possible. Selection of lease or hire contractors for minibuses and buses should be assessed for their standards of safety, maintenance and management.

Off-road vehicles

Any vehicle in the segment of 4WD and SUVs. Mostly intended to site work. Off-road type vehicles are not recommended for normal road and highway use, as their handling characteristics require special training for drivers. They should only be used where there is a requirement for off-road use or where the road surface conditions require a vehicle of this type.

Heavy vehicles

Any vehicle greater than 3.5 tones of fixed chassis or articulated trailer including trucks and special purpose construction vehicles. These vehicles are intended for stand-by or response operations. Drivers of special purpose vehicle should have their operators licenses other than the standard Governmental License.

The following are subject to all types of vehicles;

- Vehicles must be suitable for the intended purpose
- Registration and insurance details are kept on file in the office.



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- All vehicles must have comprehensive insurance to cover third party as well as MEKE employees and families.
- All vehicles will meet the emission standards of Turkey
- All vehicles will meet the licensing requirements of Turkey
- Tires must be suitable for the duty that the vehicle is normally used to perform
- The same type and manufacturer of tire should be fitted to all wheels.

Hiring cars and taxis

In case of requirement to use taxis or other hire cars, a minimum of below items must be complied:

- Properly maintained vehicles according to the manufacturer's specification
- Safety belts for all seats.
- Tires with a minimum tread depth of 1.5 mm over the whole tread pattern

5.4. VEHICLE MAINTENANCE STANDARDS

- All company vehicles shall be maintained in a roadworthy condition in accordance with local legal requirements and manufacturer's recommended schedules at all times.
- Vehicles must only be maintained or repaired by approved contractors.
- Maintenance and repair contractors shall be assessed and selected on the following basis; availability of competent, qualified staff, ability to supply genuine, quality spare parts when required, quality of workshops and equipment, management standards and work practices financial stability.
- Vehicle replacement frequency is affected by several factors. As a general rule vehicles should be renewed every three (3) years as reliability often starts to decrease and more expensive repairs and maintenance are likely to occur. This is a management decision and can be influenced by the ability to renew vehicles. It may be easier to renew vehicles more often if they are leased rather than owned where capital constraints or depreciation prevent three (3) yearly renewals.

6. SPECIFIC PROCEDURES

6.1. VEHICLE SAFETY CHECK

Drivers shall conduct a visual and physical pre-check of vehicles prior to driving each day by performing a walk-around of the vehicle.

- Check for apparent problems with the vehicle, such as improper tire inflation and excessive tire wear; broken, dirty, or missing lights, lenses, mirrors, wiper blades; or dirty or excessively pitted or cracked windows.
- Check for any damage to the vehicle. If damage is found during the walk-around inspection, immediately report it to the supervisor or vehicle owner/agent.
- Verify that the fuel tank is properly capped.
- Check for any conditions that could cause damage to the vehicle during operation of the vehicle.
- Verify the presence of appropriate communication equipment (cell phone, satellite phone radio, etc.), that it is functional and that all passengers know how to use it.
- Verify that the vehicle heater, defrosters, headlights, taillights, and windshield wipers are in good working order.
- Verify that all mirrors are adjusted properly.
- Verify that seat belts are functional.

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- Verify that the following is carried in all vehicles; first aid kit, fire extinguisher, spare tire, tire tool, jack and emergency reflectors.
- Check engine oil and water.

“Vehicle Safety Check Form” should be filled daily and the records should be delivered to Authorized Manager at the end of week.

6.2. SAFETY BELT USE

Seat belts provide impact protection, they absorb crash forces, and they keep you from being thrown out of the vehicle. Wearing safety belts while travelling in any company vehicle or in vehicles leased or hired is mandatory for all occupants and is a condition of employment for staff and contractors. Research clearly indicates that the use of safety belts has a significant effect in reducing the number of deaths and the severity of injuries resulting from traffic accidents. Safety belt usage assures maximum operator and passenger safety, thus minimizes the possibility of death or injury as a result of motor vehicle accidents.

The following procedure should be complied:

- Employees shall use the safety belts, properly adjusted and securely fastened when operating or riding in any vehicle so equipped. Belts must be adjusted so that they fit firmly around the body.
- The driver of the vehicle is responsible for ensuring compliance by all occupants of the vehicle they are operating. Employees are responsible for ensuring that their visitors travelling in the vehicle use the seat belts.
- No person shall operate a work related vehicle in which any safety belt in the drivers seating position is inoperable.
- No person shall be transported in a seating position in which the safety belt is inoperable.
- No person shall modify, remove, deactivate or otherwise tamper with the vehicle safety belts except for vehicle maintenance and repair.
- Employees who discover an inoperable safety belt shall report the defect to the appropriate supervisor. Prompt action will be taken to replace or repair the system.
- If a vehicle does not have seat belts in the rear seat then the front passenger seat should be used where there is a seat belt fitted.
- Seat belts must be worn in a fashion consistent with the original design.

It is strongly recommended that safety belts be utilized by all employees and their families at all times in non work related vehicles to further reduce the risk of death or injury.

Where it is necessary to use vehicles without safety belts, the following actions should be taken:

- Sit in the back seat behind the driver or front passenger seat.
- Do not sit in the middle of the back seat
- Instruct the driver to drive slowly.

6.3. HOURS OF DRIVING

Drivers should not drive for more than eight (8) hours total and four (4) hours uninterrupted for twenty four (24) hours period.

It is advice to have rests and avoid uninterrupted driving. The rest periods according to vehicle type given below:

- Light Vehicles: Fifteen (15) minutes rest for each two (2) hours of driving.

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- Heavy Vehicles: An hour driving for each four (4) hours of driving.

Regardless of driving hour for twentyfour (24) hours of period below mentioned rules should also be obeyed:

- All drivers are to be made aware of the need to stop for breaks to ensure that they do not suffer symptoms of fatigue caused by heat, difficult driving conditions such as terrain weather, traffic etc., medical / medicinal related issues, dietary factors.
- A minimum of eight (8) hours uninterrupted rest shall be taken between shifts.
- Rest must not be taken in the cab of a vehicle unless that vehicle has a cab bunk.
- Drivers should have at least one day off work each week.

6.4 DRUG AND ALCOHOL USE

Drivers are required to comply with legal requirements as well as MEKE requirements at all times and must not drive whilst under the influence of alcohol or prescription medicines if they are likely to impair driving performance. Drivers are to establish the possible side effects of all medicines prior to driving.

6.5 USE OF MOBILE PHONES IN VEHICLES


There is strong evidence to suggest that the use of mobile phones while driving dramatically increases the risk of a road accident. The increased risk is attributed to drivers taking their eyes off the road, reducing concentration and reaction time caused by the distraction associated with picking up or holding the phone, dialing numbers and being involved in long conversations. Similar risks are likely to exist even if a “hands-free” set is provided. Using mobile phones, including those with “hands-free” kit, in moving vehicles must be kept to an absolute minimum such that the driver’s attention to the road is not compromised.

- Hand held mobile phones must not be used when driving.
- Mobile phones may only be switched on whilst driving if attached to a “hands-free” kit or phone must be connected to car’s audio system via bluetooth of the phone. If a “hands-free” kit is not fitted the mobile phone must be switched off or have the calls diverted to a suitable alternative phone. A “hands-free” kit is permanent voice activated equipment installed in the vehicle. It is not an earpiece connected to the phone. Approved “hands-free” kits will be provided and installed by suppliers for all vehicles. All other functions including video calls, texting and e-mailing are prohibited. If driver decides to pull over to take a call the vehicle should be well off the road in a safe place.
- Drivers must not make outgoing calls whilst their vehicle is in motion (even if a “hands-free” kit is fitted). If outgoing calls need to be made the vehicle should be stopped and correctly parked in a safe area.
- Incoming calls should only be answered if it is safe to do so and if they can be accepted “hands-free”. Any conversation must be kept as short as possible. Ideally, the caller should be told they will be called back at a later time e.g. when the vehicle is stationary.

6.6 DRIVING OFF-ROAD

Site visits or field work located at rural areas should be complete only with off-road capable vehicles and below issues should be considered:

- Use dim headlights at all times; day and night (except as needed for safe visibility).
- After wet or snowy weather ascertain road conditions before starting a journey.
- If lost, stay with the vehicle. The Lost Man Procedure will be activated and you will be located.

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6.7. DRIVING AT NIGHT

Hours of darkness are considered as one-half hour before sunset until one-half hour after sunset. Night driving should be limited where possible. In such circumstances, the teams should preferably stay at the location for the night or return to the nearest settlement. MEKE employees and contractor personnel are not permitted to drive during the hours of darkness except as follows:

- In response to an emergency (including business related operations such as oil spill response).
- For urgent operational purposes with prior approval by the Authorized Manager subject to a journey-specific risk assessment.
- Journeys undertaken as routine routes to and from work which result in the journey being either started or completed during the hours of darkness.
- Any other journey deemed necessary and approved by the Authorized Manager subject to a journey-specific risk assessment.

In circumstances of night driving, professional drivers who have had sufficient rest and are alert will be used. Following precautionary measures/controls are mandatory for driving during the hours of twilight and complete darkness:

- The driver must be reminded of elevated risks of driving during nighttime.
- Condition of the vehicle must be re-inspected
- Physical fitness and alertness of the driver must be re-confirmed.
- Maximum speed limits according to Turkish Highway Code should be reduced by 15 km/h as a precaution.

6.8. TOWING

Non-emergency towing must be by vehicles with approved rigid towing equipment and subject to the following:


- Equipment being towed must have its own independent braking system with the exception of the following specific equipment: Small boats with appropriate trailers, Light towers, Light-duty trailers, Generators (towable), Reel Packs (6x6 and 8x8 sizes only), other equipment as approved by the Depot Manager.
- Towing must be confined to local areas except when involved in training or exercises where specific equipment must be towed to the training or exercise site subject to a journey-specific risk assessment.
- Maximum towing speed is fifty (50) km/h.
- Towed equipment which exceeds the width of the towing vehicle must be equipped with flashing indicators and brake lights powered by the towing vehicle.
- Towed equipment must not exceed the towing capacity specified by the towing vehicle manufacturer.

6.9. VEHICLE LOADING

- Vehicle loads must not exceed the load capacity as specified by the vehicle manufacturer.
- Vehicle loads must not extend beyond the sides of the vehicle.
- Loads which exceed the rear of the vehicle up to one meter must be fitted with a red indicator flag positioned at the furthest extent of the load in full view of a following vehicle.
- Loads which exceed the rear of the vehicle by more than one meter must be fitted with a red indicator flag and a red light positioned at the furthest extent of the load in full view of a following vehicle.
- Vehicle loads must be properly secured.
- Loose tools or equipment may not be carried in the passenger compartment.

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- Fuel containers (approved metal construction and design) must be carried on the outside of the vehicle passenger compartment and properly secured.
- The following color code must be used for all liquid containers, specifically fuels, water and lubricants:
 - Gasoline: Red
 - Diesel: Yellow
 - Water: White
 - Lubricating Oils: Green
 - All other Liquids: Complete label on container

6.10. CONVOY DRIVING

All MEKE vehicle convoy movements must be properly organized to satisfy the following requirements:

- Reporting time (for vehicles and drivers) and location must be confirmed forty-eight (48) hours in advance of the estimated time of departure (ETD).
- The convoy supervisor shall perform on-site vehicle checks; and prepare and supervise a Journey Management Plan for all vehicles.

6.11. LOST MAN PROCEDURE

The purpose of this procedure is to ensure successful rescue of drivers and passengers should they become stranded or lost. This procedure is initiated by failure of the driver to make the necessary check calls or failure to reach the destination by the ETA as identified within the specific Journey Management Plan. This is an essential and critical element of the Journey Management process and the basic principles are as follows:

- The Lost Man Procedure should default to over-reaction, not under-reaction. Immediate notification of the Authorized Manager is required.
- A full-scale search shall be initiated in the event a driver is two (2) hours late in making their check call or arrival at their destination as identified by the ETA.
- Response team shall be activated from the nearest known office.
- Assumptions are prohibited and there shall be no retribution for over-reaction.
- Searches shall use all appropriate and necessary means of rescue including air and local emergency services.
- Senior person at the departure and arrival destinations shall personally coordinate and carry out the rescue and investigation of the applicable Journey Management Plan.
- Lost man incidents are considered as serious near miss incidents and a thorough investigation is required.

6.12. HEAVY / HARSH WEATHER CONDITIONS

MEKE operates in different geographic locations which might have heavy/harsh weather conditions. Any trip that is to be taken during times of poor weather must be assessed to determine if the trip can be rescheduled or cancelled. Before the trip begins, it must be confirmed that weather conditions are safe for driving and that the vehicle being used is adequate for the weather conditions. In addition, all emergency supplies must be accounted for and any weather specific aides must be brought along, such as snow chains or extra clothing. The driver of the vehicle must carry a cell phone in case of emergency as well as a list of local emergency response numbers for the area being traveled. As always, if possible, consider canceling or rescheduling the trip.

Below issues should be considered under extreme weather conditions:

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Extreme Hot Weather

- If it is essential for a driver to wait in a parked car then the air conditioning may be used if the outside air temperature is more than twenty five degrees Celsius (25^oC).
- When driving in hot weather it is particularly important to keep an eye on the lights and gauges. If your temperature gauge moves up, turn off your air conditioner and turn on the heater to its highest and hottest setting. It will be uncomfortable, but it will help draw some of the heat away from the engine.
- If you are stopped in traffic put the car in "park" and lightly step on the gas to help circulate coolant.
- If the temperature light goes on or if the gauge enters the red zone, immediately pull off the road to a safe spot, well away from traffic. Do not drive any further, not even to the next exit. Driving with an overheated engine can cause serious damage to the engine.
- Do not attempt to remove the radiator cap itself. The hot pressurized coolant will spray out with great force. Do not pour water over the radiator or engine, since a dramatic change in temperature could cause damage. After the engine cools, add a fifty fifty mix of coolant and water to the reservoir to bring it up to its proper level.

Heavy rain

- To Improve visibility turn on your lights and defroster.
- Avoid sudden moves, try to drive in the tracks of the car ahead, reduce your speed, allow for additional stopping distance.
- Hydroplaning occurs when the tires of your car lose contact with the road and ride up on a wedge of water. Make sure your tires have proper treads and are properly inflated. If you do hydroplane, keep the steering wheel straight, take your foot off the gas. Don't hit your brakes or try to steer. As you slow, the weight of the car will cause it to settle down onto the road again.
- Be very cautious in light rain or mist.
- Remember, puddles can hide potentially damaging potholes.

Flood


- Do not attempt to drive through flood waters. The water may be deeper than it looks.
- If you happen to drive into an area where water is running swiftly, the force of the current may pull your car to one side. If this happens ease off the gas pedal, but don't touch the brakes. Then steer away from the swift water.
- If your car is caught in a flash flood, get out of your car immediately and move to higher ground.

Winter storm

- Before driving, thoroughly clean ice and snow off all windows, the hood and the trunk.
- Utilize snow tires and chains if necessary.
- Drive slowly. Depending on the weight of your vehicle, you will need three (3) to twelve (12) times more stopping distance on icy roads than on dry surfaces.
- Use low gears to keep traction, especially on hills.
- Brake gently to avoid skidding. If your wheels start to lock up, ease off the brake.
- Remember, bridges and overpasses usually freeze first, slow down when approaching them.
- If caught in a blizzard, stay in your car. Leave a window partially open. Clear the snow away from your tailpipe. Run the engine and heater for about 10 minutes every hour to stay warm.
- Don't pass snow plows and sanding trucks. The drivers have limited visibility, and you're likely to find the road in front of them worse than the road behind.
- Don't assume your vehicle can handle all conditions. Even four-wheel and front-wheel drive vehicles can encounter trouble on winter roads.

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Fog

- If you see a patch of fog ahead, slow down before you reach it.
- Turn on your low beam headlights or fog lights.
- Turn on your defroster and windshield wipers.
- Be alert for slow moving vehicles and traffic stopped ahead.
- In heavy fog, roll all your windows down. You may actually hear other cars before you see them.

6.13 THREAT OF HIJACKING OR TERRORISM

If any portion of the route falls in sensitive security zones, where additional measures need to be taken, night drive is strictly forbidden for MEKE employees, contractors, families or visitors. Only in day time the site visits can be made if the support of police, gendarmerie and/or public security is provided.

6.14 EXPATRIATE STAFF DRIVING

For special projects MEKE can employ expatriate staff. Expatriate staff have the option of driving when the following conditions are achieved:

- Expatriate staff who drive must be under long term contract exceeding a year.
- Anyone who drives must be a competent Turkish speaker.
- A Turkish driving license must be obtained or equivalent valid abroad license must be approved by Turkish authorities.
- A defensive driving course by an approved instructor must be undertaken prior to start driving.
- If the car is leased, approval must be obtained from the lease company for expatriates to drive the car.
- The car must be insured for the expatriate driver.
- Expatriates will only drive their allocated car.

6.15 ACCIDENT REPORTING

Accidents without injuries or fatalities, damage only to vehicle or load belonging to MEKE must be reported to the Authorized Manager within twenty four (24) hours.

Accident involving the below issues should be notified immediately to Authorized Manager,


- Damage to public property,
- Damage to 3rd party property,
- Injury or Fatality,
- Alcohol or drug use during or before driving.

The following steps should be taken if faced with a vehicle accident on a public road:

- Stop and activate emergency hazard lights.
- Protect injured personnel from further harm (i.e. turn engine off, stop fuel leaks).
- If there are injuries or fatalities call 121 for medical assistance and 155 for security assistance, give all details and remain in contact with emergency personnel.
- Secure the area to prevent public harm.
- Render assistance to the casualties.
- Record all details of the accident.

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Accident recording should managed by filling out “Accident Reporting Form” (appendix 2) , accidents resulted without any injury or fatality. Injuries and fatalities have priority than damage to property and should be handled instantly. In such cases the “Accident Reporting Form” should be filled after the emergency ended.

7. JOURNEY MANAGEMENT PLANNING GUIDELINE

This Journey Management Plan reflects the critical importance placed by MEKE on effective journey management of all personnel in order to meet our overall goals of no accidents, no harm to people, and no damage to the environment.

All road journeys undertaken by any MEKE employee in excess of 25 km must be managed to ensure that action is taken to mitigate risks.

Preparing a Journey Management Plan for every driving activity is impractical. This guidance applies to all heavy vehicle and regular light vehicle road journeys in the conduct of MEKE business except for local travel less than twenty five (25) km/h.

For repetitive, short duration journeys in excess of twenty five (25) km/h of head and main offices, worksites, depots or inside a facility with fixed boundaries (e.g. wire fence, walls etc.) including facilities of client’s , preparing a journey management plan is not effective as the journey are very frequent and total journey times are very limited.

Journey management principles will guide the application of controls as follows:

- A journey by road must be necessary and business-related.
- Driver driver must be fully fit, rested and sober.
- Driver must complete the Vehicle Safety Check Form (Appendix 1).
- Driver must complete a written Journey Management Plan form based on the type of journey.
- A Lost Man Procedure must be activated if the driver is a hour overdue of Estimated Time of Arrival (ETA).

7.1. STANDARDIZED JMP

The journeys inside the settlement vicinities in excess of two (2) hours of driving are subject to a standardized JMP. Within those limitations the length of journey complies with the driving-rest periods (see section 6.3 for driving hours) so that for all type of vehicles the driving period is not exceeded. Also these types of journeys are within settlement borders on public roads where the road condition are always checked and necessary maintenance actions are taken. Also, in case of emergencies, all facilities are close by.

A Standardized Journey management plan includes the information of;


- Driver’s name and mobile telephone number.
- Passenger’s name(s) and mobile telephone number(s).
- Vehicle registration number.
- Destination
- Start time (estimated) ETD.
- Arrival time (estimated) ETA.

And do not include the information of;

- Check call time(s) and location(s)
- Planned rest stop(s)

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- Alternative Route selection

If no arrival report within one hour of the ETA, a check shall be made with the destination point. In case of a negative result, the 'Man Lost' procedure shall be initiated.

7.2 CASE SPECIFIC JMP

Below mentioned cases needs a specific JMP to be prepared;

- More than two (2) hours of driving on public roads
- Journeys to rural areas, remote locations outside public roads (regardless of driving hours)
- Journeys includes night driving necessity (regardless of driving hours or settlement vicinities)
- Journey necessity under extreme weather conditions (regardless of driving hours or settlement vicinities)

This type of JMP includes the information of

- Driver's name and mobile telephone number.
- Passenger's name(s) and mobile telephone number(s).
- Vehicle registration number.
- Route description
- Destination
- Start time (estimated) ETD.
- Arrival time (estimated) ETA.
- Check call time(s) and location(s) .
- Pre-planned rest / stop areas;
- Alternative Route selection
- Night driving (if included)
- Weather conditions readiness (if the journey is taking place under heavy weather conditions)


Where journeys are of more than one day's duration, a separate Journey Management Plan Form is to be filed for each day of the trip.

8. ANNEXES

- F.25.18 Accident Reporting Form
- F.25.19 Vehicle Safety Check Form
- PL.25.2 Journey Management Plan

9. REVISION HISTORY

Revision Number	Revision Date	Reason for Revision
00	20.06.2020	First publishing

	CODE OF CONDUCT FOR BUSINESS PARTNERS		
	<u>Document number:</u> PO.11	<u>Issue date:</u> 31.12.2020	<u>Revision No.:</u> 00

1. PURPOSE AND SCOPE

The purpose of this here present policy is to explain the behaviors we expect from our business partners in order to make the basic principles of ethical and moral values of our company, linked to the ISO 37001: 2016 YMYS standard, sustainable.

This here present policy covers the demands and principles regarding integrity, as well as compliance with ethical standards and applicable laws in our joint work with our business partners.

2. DEFINITIONS AND ABBREVIATIONS

- **Ethics and Compliance Committee** A group of people selected from our departments within the company to make decisions in case of non-compliance with ethical values
- **EYS Team:** Integrated Management System Team (ISO 9001, ISO 14001, ISO 45001, ISO 37001, ISO 22301)

3. RESPONSIBILITY

The responsibility for the preparation, modification and supervision of this here present policy belongs to the Ethics and Compliance Committee; the responsibility for the implementation belongs to the Ethics and Compliance Committee; and the responsibility for its approval and follow-up belongs to the top management.

4. POLICY

Our company only cares about quality, reliability, price and added value in its services and product purchases. We look for business partners who work in accordance with the ethics and working principles of our company in all our works. We organize all partnerships in accordance with the laws and rules, as well as with contracts that have been reviewed by the Ethics and Compliance Manager. We regularly audit business partners' compliance with laws and rules.

The need to comply with ethical standards and applicable laws in our joint work with our business partners, as well as the demands and principles regarding the integrity issue are determined in these codes of conduct that are prepared for our business partners. Our business partners are all establishments that do not belong to our company, but provide goods and services to our company. For example; Suppliers, consultants, representatives, other persons and businesses that provide goods and services, etc., may be included to this context. Our company expects its business partners to implement in all business areas the principles that are designed for them and stated here below. One of these expectations is that business partners perform their business activities honestly and ethically, and especially they comply with the applicable laws (human rights, anti-corruption, data protection, competition, monopoly, environmental law, etc.) that are applicable to them.

Our business partners are expected to ensure that their business partners comply with the principles set forth in this code of conduct, and encourage them to act honestly, responsibly and fairly, as required.

Social Responsibility


We believe that taking social responsibility is an important factor for sustainable success of a company and is therefore an indispensable part of a value-oriented company management.

Human rights

Our business partners must respect generally accepted human rights.

Child Labor and Forced Labor

Our business partners must strictly reject child labor and comply with applicable regulations prohibiting child labor. Furthermore, our business partners should not overlook any form of forced labor.

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Equality of Chance

Our business partners must encourage business diversity and must not tolerate any kind of discrimination in hiring and employment.

Freedom of Meeting

Our business partners must adopt the laws in force on freedom of assembly and the formation of interest groups, and declare that they will protect the rights of their workers in their businesses as guaranteed by these laws.

Security

The safety of people is always a top priority and constitutes one of the core values of our business partners. Our business partners together with their employees must provide a safe working environment and important competencies in terms of safety, as well as the safety of their products and services.

Work and Health Safety

Our business partners must prevent people from being exposed to danger through consistent and preventive occupational safety and must support their employees to stay healthy by providing appropriate working conditions. Employee safety is an essential requirement of operator's actions for our business partners.

Environmental Protection

Our business partners must comply with the applicable environmental standards and dedicate themselves to sustainable management and environmental protection principles as an operating value.

Work and Working Conditions

Our business partners must comply with the relevant laws in force and their agreements with their social partners. Our business partners must pay their employees adequately, on time and appropriately.

Data Protection

Our business partners must comply with all applicable laws in particular must protect the personal information of their employees, business partners and customers.

Anti-Corruption

Our company does not tolerate any form of corruption and other unfair business practices. Transparency and openness are essential requirements for our company in order to ensure trust and credibility in trade and in our relations with our business partners.

Corruption

Our business partners cannot tolerate any form of corruption and bribery.

Consultants/Agents/Intermediaries

Payments to consultants, agents, brokers and/or other intermediaries must not provide unfair advantage to business partners, customers and other third parties. Accordingly, our business partners should carefully select their consultants, agents, brokers and other intermediaries by applying appropriate selection criteria.

Avoiding Conflict of Interest

Our business partners should avoid conflicts of interest that could lead to corruption risks.

Invitations and Gifts

Our business partners, within the scope of our company-related activities, only accept or make invitations that do not violate the laws in force (especially those related to corruption), for which preferential treatment and benefits are not expected in return. The same applies to accepting and giving gifts, other matters or any kind of benefit.



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Behaviors against Public Officials

Our business partners cannot tolerate any offer of financial or moral benefits to public officials or persons who occupy equivalent positions. (Whether or not these offers are made directly, indirectly, or by third parties.)

Political Parties

Business partners cannot in any way tolerate providing material or moral benefits to any political party, its representatives or officials or candidates of political institutions.

Donations/Sponsorships

Donations are made only voluntarily by our business partners and no benefits can be expected in return. Sponsorships to individuals, groups and institutions should not be made to gain any commercial interest.

Money Laundering

Our business partners should take the necessary measures to prevent money laundering in their businesses.

The Competitive Behavior of Our Business Partners

Our company always pays utmost care to act as a responsible market participant and expects its business partners to act in the same way.

Competition and Cartel Laws

Our business partners carry out their activities in compliance with all relevant laws. Especially, they do not make arrangements and agreements that will affect prices, conditions, strategy and customer relations, and for instance during participation in bidding processes. The same rules apply also to the exchange of information that is sensitive to competition or practices that may restrict competition illegally.

Export and Import Controls/Fight against Terrorism

Our business partners are obliged to comply, particularly in terms of global events, with all applicable laws regarding the import and export of products and services and regarding international anti-terrorism.

Compliance with the Code of Conduct for Business Partners

Our business partners are obliged to ensure compliance with the principles that are depicted in this here present code of conduct for its business partners.

Notification to Our Company

Our business partners should notify our company of the crimes that will affect our company and that are committed during their commercial activities with our company .

Protection of Whistleblower

Our business partners will not tolerate any discrimination against those who report violations of the principles depicted in this here present code of conduct for its business partners.

Supply chain

Our business partners will carefully select their suppliers with which they cooperate in their activities with our company and will inform them about the principles stated in the code of conduct or equivalent principles for their business partners and will ensure compliance with these principles.

Our company encourages cooperation with its business partners in its activities. In case of minor violations of this code of conduct that is depicted for business partners, if the business partner that committed the violation will express its willing and sincere effort to correct the mistake, the partner in subject will be given the opportunity to compensate the violation in a reasonable time and to take necessary preventive actions. In case of serious violations (especially those that constitute a crime), our company reserves the right to apply all legal sanctions, including the immediate



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termination of business relations with the business partner who committed the violation, and the claim for damages and other rights.

If you have any questions about the content or implementation of these policies, you can contact the Ethics and Compliance Manager of the Company at etik@mekemarine.com or by calling **0544 944 63 53**.

5. REVISION HISTORY

Revision Number	Revision date	Revision Reason
00	31.12.2020	First publication