

## CODE OF CONDUCT AND BUSINESS ETHICS

United Global Ro-Ro expects all employees to conduct themselves and carry out company business in a manner that reflects the highest standards of ethical behavior and complies with all applicable laws, regulations, and company policies.

This includes avoiding both actual and potential conflicts of interest, as well as protecting the company's confidential and proprietary information.

While it is not possible to define every situation that may constitute a conflict of interest, employees are expected to exercise sound judgment and always act in the best interests of United Global Ro-Ro. If a situation arises where a potential conflict may exist, employees should consult the Human Resources Department for guidance.

Protecting confidential business information and trade secrets is essential to the company's success and reputation. Confidential information includes any non-public information related to the company's operations, customers, employees, suppliers, commercial activities, or business strategies that employees may access during the course of their employment.

Any employee who improperly uses or discloses confidential information or trade secrets will be subject to disciplinary action, up to and including termination of employment and possible legal action, even if the employee does not personally benefit from the disclosed information.

All employees are expected to:

- Conduct themselves in a professional, respectful, and ethical manner
- Treat colleagues, customers, suppliers, and business partners fairly and with integrity
- Understand that behavior considered acceptable by one person may not be acceptable to another
- Recognize the difference between normal workplace disagreements and inappropriate conduct such as harassment, discrimination, or bullying
- Comply with all company policies, procedures, and applicable legal requirements
- Contribute to maintaining a safe, inclusive, and respectful working environment

All employees are responsible for understanding the standards of behavior expected from them and ensuring that their conduct does not result in unethical behavior, misconduct, or violations of company policies.

A detailed United Global Ro-Ro Code of Conduct and Business Ethics Policy is available in the company shared folders and internal communication platforms for employee reference. Employees who have questions regarding acceptable conduct or ethical matters are encouraged to contact the Human Resources Department.

This policy applies to all matters related to the business activities of United Global Ro-Ro and its affiliated and subsidiary companies.

**TOLGA EMRAH GEZGİN**

**CEO**