

HEALTH, SAFETY, ENVIRONMENT, QUALITY AND SUSTAINABILITY INTEGRATED MANAGEMENT SYSTEMS POLICY

Our organization operates within the maritime logistics ecosystem by providing international ocean freight coordination, Ro-Ro transportation, vessel chartering, and related operational support services through its activities in Türkiye and the UAE.

As a responsible logistics coordinator, we recognize that the continuity, reliability, safety, environmental performance, and ethical governance of our services are essential to our customers, business partners, employees, and all stakeholders involved in the supply chain. Our purpose is to maintain a safe, legally compliant, environmentally responsible, customer-focused, and continuously improving logistics network across all areas within our operational scope.

In line with the context, strategic direction, and compliance obligations of our organization, we adopt the following commitments as the foundation of our Integrated Management System, covering ISO 9001, ISO 14001, ISO 45001, and our corporate sustainability principles.

2.1. QUALITY MANAGEMENT SYSTEM (ISO 9001) POLICY

Our organization aims to provide reliable, transparent, and high-performing logistics coordination services in international maritime transportation, Ro-Ro operations, and chartering processes. We recognize that service quality in Ro-Ro transportation depends not only on timely delivery, but also on cargo integrity, operational planning, documentation accuracy, contractual compliance, and effective communication with customers and business partners.

In line with this approach, we commit to:

- Meeting customer requirements and contractual obligations in accordance with applicable maritime trade rules, international logistics practices, and agreed service conditions,
- Ensuring timely, damage-free, and traceable transportation coordination by applying structured planning, voyage monitoring, cargo follow-up, and operational control mechanisms,
- Fulfilling applicable legal requirements, customer specifications, INCOTERMS rules, charter party requirements, BIMCO standards where applicable, and other binding contractual obligations,
- Securing our service processes, including freight coordination, chartering, voyage management, documentation, and customer communication, through a risk-based thinking approach,
- Applying the zero-defect principle in transportation planning, documentation management, stakeholder communication, and operational follow-up,
- Improving customer satisfaction by ensuring accurate information flow, timely response to operational changes, and effective resolution of service-related issues,
- Continually improving our Quality Management System in line with market expectations, customer needs, technological developments, digitalization, e-documentation, and e-bill of lading applications,
- Governing the deployment of digital platforms and AI-assisted tools within our operations in a responsible manner, ensuring that data quality standards are upheld and that technology-generated outputs are subject to appropriate human review before informing critical operational decisions.

2.2. ENVIRONMENTAL MANAGEMENT SYSTEM (ISO 14001) POLICY

As a maritime transportation and Ro-Ro logistics coordinator, we recognize that our environmental responsibilities include both the direct impacts of our office and port-related activities and the indirect impacts associated with the vessels we charter, the cargo flows we coordinate, and the business partners we engage.

Although we are not a vessel-owning company, we acknowledge our role in influencing more responsible maritime logistics practices through supplier selection, chartering decisions, operational monitoring, and customer communication.

In line with our environmental protection vision, we commit to:

- Protecting the environment and preventing pollution at source in relation to our office activities, port interfaces, operational coordination, and business processes,
- Identifying, evaluating, and managing the environmental aspects and impacts associated with our activities, services, suppliers, chartering processes, and logistics coordination responsibilities,
- Applying a life-cycle perspective in our supply chain and chartering processes by working with shipowners and service providers that comply with applicable MARPOL requirements and support the protection of the marine ecosystem,
- Prioritizing environmentally responsible chartering and procurement practices by considering vessel performance, regulatory compliance, fuel efficiency, emission performance, and environmental risk factors where operationally and commercially feasible,
- Fully complying with the environmental legislation of the countries in which we operate, applicable international conventions, port regulations, customer requirements, and other compliance obligations,
- Supporting the prevention of marine pollution by working with suppliers and shipowners that manage ballast water, bilge, waste, sludge, and other vessel-generated residues in accordance with lawful and responsible disposal practices,
- Establishing environmental objectives and targets, monitoring environmental performance, and continually improving our Environmental Management System,
- Implementing structured digital monitoring to measure, record, and report our transportation-related emissions with verifiable accuracy, and tracking voyage-level emission data as a standard operational obligation,
- Supporting customer supply-chain transparency by improving the accuracy, availability, and reliability of environmental data related to the transportation services we coordinate.

2.3. OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM (ISO 45001) POLICY

The protection of human life, health, and well-being takes precedence over all commercial and operational objectives. We are committed to providing safe and healthy working conditions for our employees, subcontractors, visitors, and relevant operational partners within the scope of our activities.

We recognize that Ro-Ro transportation and maritime logistics involve dynamic operational interfaces, including port areas, vehicle movement, vessel access, cargo coordination, emergency communication, documentation

processes, and third-party service providers. Therefore, our occupational health and safety approach is based on prevention, consultation, risk reduction, operational discipline, and continual improvement.

In line with this approach, we commit to:

- Providing safe and healthy working conditions appropriate to the size of our organization, the nature of our services, and the OH&S risks associated with our activities,
- Preventing work-related injury and ill health by identifying hazards, assessing risks, and implementing appropriate control measures across our office, port-related, and operational coordination environments,
- Eliminating hazards and systematically reducing OH&S risks related to our activities, including those arising from subcontracted services, port interfaces, vehicle logistics, emergency situations, and operational communication gaps,
- Fully complying with applicable OH&S legislation, labor laws, port safety requirements, contractual obligations, and other relevant requirements in Türkiye, the UAE, and all jurisdictions where our services are performed,
- Encouraging the active participation and consultation of employees and employee representatives in OH&S processes, risk identification, incident reporting, and improvement activities,
- Promoting a safety-first culture among employees, subcontractors, suppliers, and business partners by maintaining clear responsibilities, effective communication, and awareness of operational risks,
- Continually improving our OH&S Management System through proactive monitoring, incident analysis, preventive actions, training, and performance review,
- Ensuring the continuity of critical operational processes, including those reliant on digital infrastructure, through established backup procedures and recovery plans; thereby ensuring that disruptions do not jeopardize the safety and working conditions of our staff or the integrity of port operations.

2.4. CORPORATE SUSTAINABILITY AND CLIMATE ACTION POLICY (ESG)

Leaving a clean ecosystem, a safe workplace, and a fair business environment to future generations is one of our fundamental responsibilities. As a maritime logistics coordinator operating within global supply chains, we recognize that sustainability must be embedded into our operational decisions, supplier relationships, customer commitments, governance structure, and long-term business strategy.

In line with our corporate sustainability and climate action principles, we commit to:

Climate Action and Decarbonization

- Supporting the transition to lower-carbon maritime logistics by considering vessel efficiency, emission performance, CII ratings, fuel performance, and regulatory compliance in chartering and supplier selection processes where feasible,
- Measuring, monitoring, and transparently reporting relevant indirect transportation emissions, including Scope 3 emissions associated with the services we coordinate,
- Supporting compliance with applicable climate-related regulations, including EU ETS and other emerging maritime emission requirements relevant to our operations, customers, and business partners,

- Improving the accuracy, traceability, and consistency of voyage-level emission data to support customer reporting, internal decision-making, and long-term climate performance monitoring.

Protection of the Marine Environment

- Working with shipowners, subcontractors, and service providers that comply with applicable marine environmental regulations, including MARPOL requirements, ballast water management obligations, and pollution prevention standards,
- Avoiding commercial relationships with suppliers that demonstrate repeated or serious non-compliance with marine pollution prevention, waste disposal, spill prevention, or environmental protection obligations,
- Encouraging responsible waste management, lawful disposal of vessel-generated waste, and prevention of pollution across the maritime logistics chain.

Social Responsibility, Human Rights and Fair Working Conditions

- Refraining from entering into or continuing commercial relationships with shipowners, subcontractors, or business partners that violate the Maritime Labour Convention, tolerate forced labor, modern slavery, child labor, discrimination, harassment, or human rights violations,
- Promoting fair, respectful, inclusive, and safe working conditions for our employees and encouraging the same standards across our business partner network,
- Supporting employee consultation, ethical reporting, and accessible communication mechanisms to ensure that concerns related to safety, working conditions, ethics, or compliance can be raised without fear of retaliation.

Corporate Governance, Ethics and Compliance

- Maintaining clear accountability structures at all management levels and ensuring that responsibilities related to quality, safety, environmental management, sustainability, and compliance are clearly defined,
- Conducting appropriate due diligence on shipowners, subcontractors, suppliers, and other business partners in relation to legal compliance, ethical conduct, environmental performance, and human rights expectations,
- Enforcing a zero-tolerance policy against bribery, corruption, fraud, conflicts of interest, anti-competitive behavior, and unethical business practices,
- Ensuring full compliance with the laws, regulations, contractual obligations, and ethical standards applicable in all jurisdictions where the organization operates, including Türkiye and the UAE,
- Providing customer satisfaction surveys and accessible reporting channels that enable employees, customers, suppliers, and business partners to raise concerns regarding ethical conduct, compliance violations, service quality, or sustainability-related matters,
- Continually improving our governance and sustainability performance through monitoring, reporting, management review, corrective actions, and stakeholder feedback.

TOLGA EMRAH GEZGİN

CEO