

CODE OF CONDUCT

GHS Lojistik Global Relocations | Ethics, Compliance and Responsible Business Principles

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CONTROLLED TRANSLATION NOTICE

This document is the controlled English translation of IMS-QMS-POL-02_TR. In the event of any discrepancy, inconsistency or difference in interpretation between the Turkish and English versions, the Turkish version shall prevail and be considered the official controlled version.

1. PURPOSE AND MANAGEMENT COMMITMENT

This Code of Conduct establishes the principles of integrity, legal compliance, safety, respect, fair competition, confidentiality and professional responsibility that govern all activities of GHS Lojistik Global Relocations. Top Management is committed to supporting implementation of this Code, providing appropriate resources and maintaining a culture in which ethical conduct is never compromised.

This document supports the company's FAIM/FIDI compliance approach and shall be applied together with the FIDI Anti-Bribery & Anti-Corruption Charter (ABC) and Anti-Trust Charter (ATC).

2. SCOPE

This Code applies to management, all employees, temporary personnel, packing crews, drivers, subcontractors, agents, suppliers and other third parties providing services on behalf of GHS. Business partners are expected to act in accordance with the spirit of this Code and all applicable contractual and legal obligations.

3. ROLES AND RESPONSIBILITIES

- Top Management: Promotes an ethical and compliant culture, reviews critical breaches and provides necessary resources.
- FAIM Coordinator / Document Owner: Coordinates controlled maintenance of this Code, annual review, communication and supporting evidence.
- Department Managers: Apply the Code within their teams, escalate concerns promptly and support corrective actions.
- All Employees: Comply with the Code, report suspected misconduct and provide accurate information during reviews or investigations.
- Partners and Subcontractors: Comply with communicated ethics, ABC, ATC, privacy, HSE and operational obligations.

4. LEGAL COMPLIANCE AND PROFESSIONAL INTEGRITY

- All activities shall comply with applicable national and international laws, customs and transport requirements, contracts and company procedures.
- False, misleading or incomplete records shall not be created; quotations, invoices, inventories, customs and operational records must accurately reflect the facts.
- Communication with customers, suppliers, public authorities and business partners shall be honest, transparent and professional.
- No commercial objective justifies a breach of legal or ethical obligations.

5. ANTI-BRIBERY AND ANTI-CORRUPTION - FIDI ABC

GHS Lojistik applies zero tolerance to bribery, kickbacks, facilitation payments, unlawful benefits and any payment or advantage intended to improperly influence a decision.

- Improper cash payments, cash equivalents or other benefits shall not be offered, requested, given or accepted.
- Payments shall not be made to public officials, customs officials, customers, suppliers or other third parties to expedite a process or improperly influence a decision.
- Gifts and hospitality must be reasonable, infrequent, transparent, appropriate to the business relationship and must not influence business decisions.
- Any suspicious payment request or corruption risk shall be reported immediately to Management / the FAIM Coordinator.
- The FIDI ABC Charter shall be kept accessible to employees and relevant business partners and communicated where required.

6. FAIR COMPETITION AND ANTI-TRUST - FIDI ATC

- Prices, quotations and commercial decisions shall be determined independently by GHS.
- Price fixing, market or customer allocation, bid rigging and other anti-competitive arrangements with competitors are prohibited.
- Confidential competitor pricing, cost, customer or strategic information shall not be requested or shared through improper means.
- If an inappropriate competition-related topic is raised during a meeting or discussion, employees shall not participate, shall leave the discussion where appropriate and shall report the matter to Management.
- The FIDI ATC Charter shall be kept accessible to relevant employees and business partners.

7. CONFLICTS OF INTEREST

- Personal, family or financial interests that may affect company decisions must not be concealed.
- Employees shall disclose any potential conflict involving a supplier, customer, competitor or other party connected to themselves or close family members.
- Company assets and information shall not be misused for personal gain.
- Where a conflict exists or may reasonably be perceived, the individual may be removed from the decision or other controls may be applied by Management.

8. GIFTS, HOSPITALITY AND REPRESENTATION

- Gifts or hospitality must not influence a business decision, create an expectation of return or create an appearance of impropriety.
- Cash, gift cards or cash-equivalent benefits shall not be accepted.
- Unusual, suspicious or high-value gifts or hospitality shall not be accepted without management approval.
- Where local law, customer policy or contract requirements are stricter, the stricter rule shall apply.

9. CONFIDENTIALITY, PERSONAL DATA AND INFORMATION SECURITY

- Customer, employee, supplier and company information shall only be used for legitimate business purposes and on a need-to-know basis.
- Passports, identity documents, addresses, contact details, financial and operational information shall not be disclosed to unauthorised persons.
- Personal data shall be handled in accordance with the GHS Privacy Notice and the Data Security and Information Management Procedure.
- Passwords, access credentials and confidential documents shall be protected; incorrect disclosure, data loss or suspicious access shall be reported immediately.
- Confidentiality obligations continue after termination of the employment or business relationship.

10. HEALTH, SAFETY AND SAFE WORKING

- Employees and field teams shall comply with HSE rules, PPE requirements and safe working instructions.
- Unsafe, hazardous or unauthorised working methods shall not be used; work may be stopped where a serious risk is identified and the responsible person shall be informed.
- Accidents, injuries, near misses, damage and security incidents shall be reported without delay.
- Working under the influence of alcohol or drugs, violence, threats or conduct that endangers workplace safety is prohibited.
- The same safety and respectful conduct standards apply at customer residences, warehouses, vehicles and third-party premises.

11. RESPECT, EQUALITY, NON-DISCRIMINATION AND HARASSMENT PREVENTION

GHS Lojistik supports a respectful, inclusive and safe workplace. Discrimination, harassment, sexual harassment, bullying, degrading conduct, threats and retaliation are not tolerated.

- Recruitment, assignment, training and development decisions shall be based on job requirements and competence.
- Employees, customers and business partners shall be treated with dignity and fairness.
- Persons who experience or witness inappropriate conduct may raise a concern through the reporting channels described in this Code.

12. HUMAN RIGHTS AND FAIR LABOUR

- Forced labour, child labour, human trafficking and similar forms of exploitation are not accepted.
- Working conditions shall comply with applicable labour legislation and fundamental human rights principles.
- Suppliers and subcontractors are expected to maintain equivalent fundamental standards.

13. CUSTOMER PROPERTY, CUSTOMER RELATIONS AND SERVICE INTEGRITY

- Customers' household goods and personal effects shall be handled carefully, securely and in a traceable manner.
- Unauthorised use, opening, removal or misuse of customer property is prohibited.
- Damage, loss, delay or service failure shall not be concealed and shall be recorded and managed under the relevant procedures.
- Information provided to customers regarding price, scope and operational status should be clear, accurate and verifiable wherever reasonably possible.

14. SUPPLIERS, AGENTS AND SUBCONTRACTORS

- Service quality, legal compliance, reliability, ethical conduct and information security shall be considered when selecting suppliers and partners.
- Critical partners shall receive the necessary operational, privacy, ABC, ATC and other compliance expectations in writing.
- Business with a third party involved in serious ethical or legal misconduct may be suspended or terminated.
- Partner performance and significant non-conformities shall be monitored through the applicable supplier / partner evaluation process.

15. ENVIRONMENTAL AND SOCIAL RESPONSIBILITY

- Practices that reduce unnecessary use of fuel, energy, paper, packing materials and other resources are encouraged.
- Appropriate segregation of waste and use of recycling opportunities are promoted.
- Sustainability objectives and performance indicators are monitored under the GHS Sustainability / ESG Programme.
- Employees are expected to act responsibly toward the environment, customers and the wider community.

16. REPORTING CONCERNS AND ESCALATION

Employees and relevant stakeholders shall report without delay any suspected ethical breach, bribery request, anti-competitive conduct, harassment, discrimination, privacy breach, safety risk, manipulation of records or other conduct believed to be unlawful or contrary to this Code.

- Concerns may be reported to the relevant manager, Human Resources, the FAIM Coordinator or Top Management.
- External stakeholders may use the company website, contact or complaint channels.
- Urgent HSE or security risks shall be escalated immediately without waiting for the normal reporting chain.
- Reports shall be handled as confidentially and objectively as reasonably practicable.

17. NON-RETALIATION

No person who raises a concern in good faith, supports an investigation or refuses an improper request shall be subject to dismissal, threats, pressure, exclusion, adverse assignment or other retaliation. Deliberately false or malicious reports may, however, be reviewed separately.

18. REVIEW, CORRECTIVE ACTION AND DISCIPLINE

- Depending on the nature of the concern, a review may be performed by Management, HR, the FAIM Coordinator or the relevant process owner.
- Where appropriate, CAPA, Incident/Near Miss, complaint, claim or other relevant record processes shall be initiated.
- Depending on severity, actions may include training, corrective action, restriction of access, disciplinary action, termination of a business relationship or legal notification.
- Reviews and actions shall be conducted on a need-to-know basis and with due regard to confidentiality.

19. TRAINING, COMMUNICATION, RECORDS AND REVIEW

- This Code of Conduct shall be communicated to personnel through controlled channels and remain accessible.
- Links or copies of the FIDI ABC and ATC Charters shall be communicated to relevant personnel and business partners where required.
- Ethics and compliance awareness shall be supported through induction and/or periodic training, and participation evidence shall be retained.
- The active Code of Conduct published on the website shall match the current SharePoint / IMS master revision.
- The document shall be reviewed at least annually and when significant legal, organisational or FAIM/FIDI requirement changes occur.
- Communication, training, reporting and review records shall be maintained in the relevant controlled IMS locations.

RELATED DOCUMENTS

- FIDI Anti-Bribery & Anti-Corruption Charter (ABC)
- FIDI Anti-Trust Charter (ATC)
- GHS Privacy Notice
- Data Security and Information Management Procedure
- HSE Procedure / HSE records
- Sustainability / ESG Programme
- CAPA Procedure and relevant incident / complaint records

20. APPROVAL AND REVISION RECORD

PREPARED BY

Simay Dökmeci
FAIM Coordinator

Approval: SharePoint / IMS controlled approval record

APPROVED BY

Hasan Ökten
General Manager

Approval: SharePoint / IMS controlled approval record

Revision History

Rev. 1 | 06.10.2026 | Comprehensive revision and migration to the IMS controlled-document format, superseding the previous standalone Code of Conduct dated 12.11.2025.