

GLOBAL PORTS HOLDING

HUMAN RIGHTS POLICY

Revision	Date of Release
V.1	April 2017
V2	September 2019
New updated policy	Ex

GLOBAL PORTS HOLDING

HUMAN RIGHTS POLICY

September 2019 V.2

1. PURPOSE and SCOPE

INTRODUCTION

Global Ports Holding ("GPH" or the "Company"), and its respective affiliated companies (unless indicated otherwise the words "Group" or "GPH" cover GPH and all of its respective affiliates (jointly controlled entities and subsidiaries, comprising employees and all of officers including the Board of Directors) commits to lead all activities in compliance with the Universal Declaration of Human Rights.

According to this declaration; all peoples and all nations, to the end that every individual and every organ of society, will strive for progressive measures in training and education to promote respect for human rights and freedoms and by progressive measures, nationally and internationally, to secure their universal and effective recognition and observance, both among the peoples of UN Member States themselves and among the peoples of territories under their jurisdiction.

The Group works toward minimizing its environmental and social risks in its activities. For this purpose, in accordance with the Guiding Principles on Business and Human Rights framework formed by the United National Human Rights Council, the Group aims to refrain from causing negative impact, to intervene when such impacts occur and to prevent negative impact of its activities, products or services, even if the Group does not directly contribute to such impacts on human rights.

PURPOSE

The purpose of this Human Rights Policy is to declare our respect for the fundamental human rights in our activities as a company, show the value we place on our employees, as well as to explain our commitments and communication channels.

SCOPE

As the Group, we expect all our affiliates and joint ventures to act in compliance with the Human Rights Policy. This Human Rights Policy covers our fundamental principles on human rights.

This Human Rights Policy covers the following:

- The Group's Board Members,
- Group executives and employees
- The third-party service provider companies, consultants, lawyers, persons and institutions working for or with the Group, including external auditors, contractors, agencies and similar parties.

The Human Rights Policy is an integral part of the Group's directives and/or policies that have been approved by the Board of Directors.

GLOBAL PORTS HOLDING

HUMAN RIGHTS POLICY

September 2019 V.2

2. DEFINITIONS

Following are brief definitions for the special terms, phrases and abbreviations used in this Human Rights Policy:

Board Member/s or Directors: the member/s of the Board of Directors

Board of Directors: Board of Directors of GPH

Company: Global Ports Holding

Employees: Employees of the Group

GPH: Global Ports Holding (“Global Ports Holding”)

Senior Management: The Chief Executive Officer of GPH and other C level officers of the Group as indicated in the organizational chart

Service Provider/Business Partners: Companies (suppliers, agencies, contractors, clients etc.) offering services to the Group and/or receiving services from the Group, including their employees

3. RESPONSIBILITIES

Board of Directors

The Board of Directors is responsible of approving and -in case of non-compliance- notifying, reviewing and supervising the determination of sanction mechanisms of the Human Rights Policy.

Senior Management

Senior Management is responsible for preparing, developing, executing and updating the Human Rights Policy. Senior Management reports to the Board of Directors about formation, publication, necessary updates and termination of the Human Rights Policy.

The implementation and supervision of the practices related to the Human Rights Policy is under the liability of the Senior Management. Senior Management is responsible for taking the necessary measures to ensure employee, supplier and contractor compliance and for notifying the Compliance and Internal Audit Department to review issues against this Policy.

Legal Department

The Legal Department evaluates the Human Rights Policy for updates and improvements when deemed necessary and makes recommendations to Senior Management.

Employees

Employees are responsible for

- adhering to and acting in line with the Group’s policies, regulations and procedures,
- working in compliance with the legislation in force,
- notifying the Compliance and Internal Audit Department when facing a behavior, activity or practice contrary to this document.

Suppliers and Business Partners

Suppliers and Business Partners must comply with the principles declared in this Human Rights Policy, as well as other related regulations. Our relations with individuals and institutions that fail to respect these principles will be terminated. Subcontractors, suppliers, clients, joint ventures and other partners are expected to respect to the human rights while doing business. Compliance audits of the implementation of this Human Rights Policy and related legislation are essential.

GLOBAL PORTS HOLDING

HUMAN RIGHTS POLICY

September 2019 V.2

Corporate Communications Department

This Policy is published in the corporate portal and its publication is under the responsibility of the Corporate Communications Department.

Human Resources Department

The Human Resources Department is responsible for distribution of this Policy to all employees within the Group.

Investor Relations Department

Within the framework of this Policy, the Investor Relations Department is responsible for organizing the relations between the Group and corporate investors, portfolio managers, analysts, current and potential shareholders and the simultaneous and transparent public disclosure of practices to all parties concerned. The Investor Relations Department is responsible for the dissemination of the prepared document on the Group's websites.

4. OUR COMMITMENTS

As a Group, we adopt and comply with the human rights regulations defined in the Universal Declaration of Human Rights ("UDHR"), the International Labor Organization's Fundamental Conventions ("ILO"), the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact and the international declarations, fundamental rules, conventions and principles where the United Kingdom and/or Republic of Turkey and/or European Union is a signatory, in all our activities. In this respect, we give importance to respecting the rights of our employees.

As a Group, to support our Human Rights Policy, we develop necessary working methods in order to create a work atmosphere where human rights are respected and complicity in activities that might directly or indirectly violate human rights is prohibited. As a Group, in all of our business processes, we are mindful of implementing compliance to the Universal Human Rights Declaration and legislations of countries where we operate.

For this purpose, as a Group;

- We respect and implement the internationally recognized fundamental human rights defined in the UDHR and in Declaration on Fundamental Principles and Rights at Work by ILO, such as non-discrimination, elimination of child labour and forced labour, freedom of association, and rights to collective bargaining and agreements.
- We signed the United Nations Global Compact and we adhere to all of its principles within our Group.
- We started the documentation process to obtain the SA8000 Social Responsibility Standard.
- We work in compliance with all legal requirements and we respect human rights and dignity of everyone.
- We treat our employees equally and offer them equal opportunities regardless of their religion, language, race, age, skin color, nationality, social background or gender and we do not allow discrimination.
- We perform our human resource selection, recruitment, placement, training and compensation processes by taking into account our employees' qualification, performance, talent and experiences.

GLOBAL PORTS HOLDING

HUMAN RIGHTS POLICY

September 2019 V.2

- We are sensitive about offering equal and competitive compensation aligned with market conditions to our employees.
- We guarantee to provide our employees a secure workplace that is far from any kind of mistreatment, discrimination, harassment, exploitation, abuse and violence.
- We develop a workplace setting in line with all applicable Occupational Health and Safety Legislation and we value raising awareness of our employees.
- We support our employees' freedom of association, meeting, assembly and collective bargaining agreements within legally recognized unions.
- We do not accept forced or compulsory labour.
- We do not allow child labour within the Group. We maintain our activities in compliance with the forced labour and child labour articles of the International Labor Organization's Conventions and according to the strictest legislations in the countries we operate.
- We do not make illegal discriminations and we respect the freedom of expression at the workplace.
- We set preventive rules for protecting the personal information of our employees.
- This Human Rights Policy covering all core labour areas of ILO and the human rights practices laid out in our Code of Ethics are communicated through the Group's internal communication channels and training programs. All of our employees are involved in this communication process globally and participate to the trainings.
- We encourage our contracted suppliers to comply with the principles stated in this policy declaration.
- We respect the rights of local communities that are affected by our activities. We take necessary measures to identify the negative impacts on human rights and to prevent, minimize and/or mitigate them.
- We contact the government authorities in our operation regions or countries, in case the human rights are under risk.
- We respect the rights of the local communities in the regions or countries where we operate.
- We declare that we set target for 100% compliance to our Human Rights Policy.
- In the case that a violation or complaint arises relating to our Human Rights Policy, we will ensure that an internal inspection according to the Disciplinary Code and Compliance and Internal Audit Code is conducted and we will cooperate in internal audit activities.
- Failure to comply with this Human Rights Policy will be submitted to the Disciplinary Code, and may result in disciplinary penalties or penal proceedings.

GLOBAL PORTS HOLDING

HUMAN RIGHTS POLICY

September 2019 V.2

5. MONITORING, AUDIT and IMPROVEMENT PROCESS

This Human Rights Policy is reviewed by the **Remuneration Committee** at least once a year in certain intervals and the practices are regularly monitored. Matters related to human rights are included in the general risk evaluation processes and risk evaluations are conducted annually.

The Human Rights Policy is part of the Compliance and Internal Audit Department's annual programs. The Compliance and Internal Audit Department presents a sample report of the audit results to the Corporate Governance Committee and contributes to the activities of the Remuneration Committee upon its request.

In case there are any gaps and/or risks that arise from the human rights risk and impact evaluations, internal monitoring/control processes or from the stakeholder feedbacks, including the international and local non-governmental organizations, received through open stakeholder dialogue, the Remuneration Committee is responsible for improving the process and reviewing the Human Rights Policy.

E-mail addresses to notify us about issues regarding the Human Rights Policy: compliance@globalportsholding.com. Furthermore, you can reach the contact points listed below.

6. ENFORCEMENT

This Policy was adopted by the Board of Directors in April 2017 and revised Version 2 is adopted by the Company in September 2019.

CONTACT POINTS

Compliance Department:

Banu Kaya

Telephone: 90(212) 244 44 40

E-mail: banuk@global.com.tr

Legal Department:

Dr/ Ece Gursoy

Telephone: 44 21039112311

E-mail: eceg@globalportsholding.com

Human Resources Department:

Pınar Arasan

Telephone: 90(212) 244 44 40

E-mail: Pınara@globalportsholding.com

Internal Audit Department:

Mert Taşpolat

Telephone: 90(212) 244 44 40

E-mail: meritt@global.com.tr