

## Code of Conduct

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Scope	Definitions
<p>D Marin is committed to act with integrity.</p> <p>The Code of Conduct outlines expectations from every individual or legal entity working for and with D Marin.</p> <p>It also outlines our responsibilities and promises to our employees, our customers and our shareholders.</p> <p>The objective is a globally applicable unified document for avoiding activities and decisions that are not in line with D Marin commitment.</p>	<p><b>D Marin:</b> the group of companies comprising the D Marin Group, defined as any company which is a direct or indirect subsidiary of Venilia Investments SA.rl and any entities in which any D Marin company either owns a majority interest or manages operations (all of the above are referred to throughout this Code individually and collectively as D Marin or D Marin Group)</p> <p><b>This policy applies to:</b></p> <p><b>D Marin employees:</b> That includes every full-time or part-time employee and executive at every level of D-Marin, irrespective of location and position.</p> <p><b>Suppliers/Consultants:</b> Anyone providing services or goods to D Marin or related to D Marin by any type of contractual relationship (including but not limited to suppliers, consultants and other business partners). This document will be an integral part of any agreement or contract signed by D Marin.</p>

Content of this document	<b>1. D Marin Code of Conduct</b>
	<b>2. Values and Code of Conduct Principles in D Marin</b>
	<b>2.1</b> Honesty, righteousness and transparency
	<b>2.2</b> Behavior Expected from Group Employees
	<b>2.3</b> Behavior expected from Executives
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**Roles and responsibilities**

Policy owner

Group CFO and Group HR Director are ultimately accountable for making sure a policy is drafted, approved, implemented, maintained and monitored.

Executive Committee

Executive Committee members are responsible for compliance for all employees within their functions, wherever they are based.

Local HR teams

Local HR teams are accountable for managing relevant communications in their market, in line with D Marin standards and report any case that is mentioned to them or they become aware of.

Code of Conduct Committee

The committee consisting of Group CFO, Group HR Director and Head of Legal is responsible to assess and evaluate any incident reported to them and assign competent employees to investigate further the incident, prior to the committee reaching any disciplinary decision.

**1. D MARIN CODE OF CONDUCT**

Our Code of Conduct sets out the expectations regarding the basic ethical principles and work rules that must be applied by every single person working for and with D Marin during the execution of their duties.

Our purpose in the creation of our Code of Conduct is to provide clarity, reinforce trust and underline our commitment to employees, customers, partners, suppliers and shareholders.

The Code of Conduct Code serves as a guideline for our informed decisions and for our mode of business conduct.

This Code must be evaluated in conjunction and in partnership with D Marin Group's every other policy and procedure.

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## 2. OUR VALUES AND CODE OF CONDUCT PRINCIPLES IN D MARIN

D Marin:

- Conducts business with its customers, suppliers and other business partners in an honest, fair and lawful manner to ensure satisfaction of its customers' needs.
- Ensures that its employees work in a motivating and supporting social culture and conducts business in a healthy and secure environment.
- Respects the environment, complies with environmental standards, and makes the maximum effort to minimize energy consumption.
- Endeavors for constant development in its work for the benefit of all its shareholders.
- Embraces the responsibilities and duties it has towards its customer and uses all kinds of resources available for the best effective solution.
- Provides all Health & Safety measures for employees, partners and customers to ensure the highest safety standards.

In the event of a possible dispute or conflict of interest, D Marin will carry out an evaluation from the perspective of the customer without prejudice.

D Marin's Code of Conduct advocates the implementation of anti-corruption measures in all locations where D Marin operates. By its strong commitment to anti-corruption principles, D Marin increases the reliability in the business environment.

### 2.1 Honesty, Righteousness and Transparency

Honesty, righteousness, and transparency are the most fundamental principles of D Marin.

D Marin protects and reflects its image, reputation and respectability in all fields where it operates in the best manner with strict commitment to these principles.

Information announced by D Marin must be complete and accurate. Notifications made within the corporation, outside the corporation and to the public must be in accordance with the principles of righteousness and honesty. D Marin adopts the virtues of honesty, righteousness, transparency, and proper business conduct in all its activities and notifications, inside or outside the Group and avoids any conduct which may damage mutual trust.

D Marin expects its business partners (i.e suppliers, consultants, contractors etc) to have the same values and act in line with the D Marin Code of Conduct. D Marin builds its business affairs on the principle of mutual trust.

In any of its business relations, if such an environment of trust is damaged or fails and cannot be recovered, D Marin reserves the right to terminate its relationships with the relevant parties.

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### 2.2 Behavior Expected from Employees

D Marin Group employees are expected to understand the Code of Conduct and behave in compliance with its provisions and the law at all times. They are required to make good use of their reasoning and speak up in circumstances that may seem improper.

In order for our employees to be able to assist management to build a high integrity culture and environment within the D Marin Group, they are expected to understand the Code of Conduct, reflect it in their jobs and endeavor to always do the “right” thing. If they are unsure of what to do with respect to a matter, they should not be hesitant to ask their hierarchical manager or Human Resources.

### 2.3 Behaviors Expected from Executives

Though the Code of Conduct applies to everybody working for and with D Marin, Executives play an integral role to the creation of an ethical behavior culture.

Executives must always act as a role model for the correct behavior and create the conditions to:

- ensure that all employees in their team understand their responsibilities, which are within the framework of the Code of Conduct and other group policies.
- create opportunities for the Code of Conduct to be discussed and talk to employees on the significance of a business Code of Conduct and compliance.
- create an environment where employees can express their opinions easily without hesitation.
- consider the Code and other group policies when evaluating employees' performances.
- Encourage employees to make decisions and engage in actions that consistently uphold ethical management principles, codes of conduct, and legal regulations, while discouraging any behaviors that may compromise them.
- hold employees accountable for complying with the Code of Conduct.
- discipline employees within the team who violate the Code of Conduct or laws.

### 2.4 Behavior Expected from third parties

Anyone who works with D Marin (including but not limited to suppliers, consultants and other business partners) must share our commitment to integrity by following the principles of our Code of Conduct when providing goods and services to D Marin or acting on our behalf.

Suppliers, as a condition of working with us, must comply with our Code of Conduct.

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### 3. CONSEQUENCES OF NOT COMPLYING

Failure to act with integrity and in line with the Code of Conduct, will lead to disciplinary action, dismissal or termination of contract in case of third parties.

#### *Review Acts and Consult*

In circumstances where you are in doubt with respect to your conduct, ask yourselves:

- Is the situation in compliance with the Code of Conduct?
- Does it seem ethical?
- Is it legal?
- Will this situation reflect on my company, our Group and me positively?
- Would I be proud to tell others about my actions?
- Would I want to read about it in the newspaper?

If the reply to any one of these questions is «No», do not commit such act.

All D Marin employees and partnered companies/ suppliers must evaluate whether their own and/or colleagues' behavior follow the Code of Conduct. If any difficulty is faced in making such evaluation or if it is thought that the conduct is not ethical, the opinion of the Code of Conduct Committee of D Marin must be obtained. Reporting decisions and conducts that are observed as not being compliant with business Code of Conduct is the common responsibility of each D Marin employee and supplier.

#### 3.1. Implementation of Code of Conduct - Code of Conduct Committee

The Code of Conduct Committee is responsible for investigating and resolving complaints and notifications regarding breach of the Code of Conduct. The Code of Conduct Committee which operates in affiliation with the Board of Directors of D Marin Global is composed of persons in the following posts:

- Chairman of the Code of Conduct Committee: D Marin Group CFO (D Marin Global Services)
- Member of the Code of Conduct Committee: D Marin Group Legal Director (D Marin Global Services)
- Secretary and Member of the Code of Conduct Committee: D Marin Group HR Director (D Marin Global Services)
- Alternate Member of the Code of Conduct Committee: D Marin Group CEO (D Marin Global Services), to participate in the committee ad hoc if required by severity of case or conflict of interest of one of the other members

It is recommended to our employees to contact and consult with the following senior executives (in the below order) prior to contacting the Code of Conduct Committee Line (if applicable):

- Related department's manager
- Local HR manager

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- Marina general manager / Head for the Country.

Notifications of D Marin Group employees' and third parties to the Code of Conduct Committee are kept in strict confidence. All examinations and investigations are conducted in confidentiality. Any event of reprisal against an employee or external partner, who has raised a problem in an honest manner, means a breach of the Code of Conduct.

Members of the Code of Conduct Committee may be contacted directly through the following portal which is designated for queries and notifications. When required, any person may write the issue in his/her native language and send it through the following external portal:

<https://dmaringlobal.ethicspoint.eu/>

All notifications made to the Code of Conduct hotline, will be replied in 24 hours.

## 4. INDIVIDUAL CONDUCT

### 4.1. Bribery

The direct or indirect offer, payment, solicitation or acceptance of bribes in any form for retaining or obtaining business or to influence a decision made within the company, or towards public officials or for any other reason is illegal and unacceptable. Any approach made to a D Marin employee or supplier for an inappropriate payment should be reported immediately.

A bribe is defined as

- Any facilitation in payment
- Giving or accepting gifts and hospitality might also be considered bribery in certain situations

D Marin takes a zero-tolerance approach in giving or receiving of bribes or improper payments in any form and will uphold all provisions of the law relevant to countering bribery and corruption in all the jurisdictions in which it operates.

### 4.2. Conflict of Interest

All persons in the scope of this policy (employees, suppliers etc) are obliged to prevent any kind of conflict of interest between D Marin and their individual activities.

Our employees are expected to act in the best interests of D Marin and to not provide benefits to themselves, their families, relatives, suppliers, customers, other employees, partners, competitors or with whom they have business relationships with, through taking advantage of their current positions; arrange their relationships in such a manner not to impair the reputation of the Group.

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Our suppliers/contractors cannot seek approvals for invoices or agreements from people in D Marin that they have a direct conflict of interest with (family members). In D Marin, conflict of company benefits and personal interests, obtaining inappropriate personal advantages or providing benefits to relatives or third parties using their positions are not permitted under any circumstances.

In case any involved party is in a situation where personal and business interests might potentially come into conflict, are requested to declare these conflicts and obtain approval.

Examples of potential conflicts of interest:

- Any employment, including a non-executive or advisory role for a company which is a competitor of, or supplier to, D Marin
- Having a partner or close relative who also works in D Marin
- Holding a senior role whilst your spouse or partner holds a similarly senior position at a competitor.
- Any type of debtor/creditor, tenant/lessor, surety, and similar relationships of benefit with their subordinates or superiors.

Conflicts of Interests should be registered through the local HR at the time of hiring or before initiation of a partnership in the case of suppliers, or whenever they occur.

### 4.3. Gifts and Hospitality

Corporate gifts or hospitality must only be offered/accepted when it is reasonable, transparent, infrequent and for the purpose of building business relationships. D Marin understands and supports reasonable and proportionate giving and receiving gifts and hospitality as part of normal business relations. However, it is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive any influence. For this reason, employees who play a significant role in decision making processes for suppliers, should in principle reject or return all gifts other than low-value, branded items or low-value consumable gifts, such as chocolates.

The same holds for our suppliers/ consultants, who should not offer any gifts or hospitality to D Marin employees, especially during a contract negotiation process, or accept any from D Marin employees.

#### Accepting Gifts

- Gifts may in no way be of cash nature (gift cheque, gold, treasury bonds, and share certificates).
- The annual total amount of gifts received per person from the same entity or third parties may not exceed €50 (fifty euro). However, if the limits for giving/receiving gifts determined in the local legislation of the country of operation are lower than such amount, such limits shall be applicable.
- Receiving gifts or benefits which are clearly meant for achieving a favor or preferential treatment is prohibited.
- Receiving bribes and/or commissions may not be accepted under any condition.

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- D Marin employees may accept gifts which are given for reasons such as sale campaigns and promotional activities and which do not exceed EUR 50 in value. It is essential that gifts are sent to the business addresses. Same holds for suppliers accepting gifts from D Marin entities.
- All gifts received by D Marin involved parties should be recorded by the Human resources department. All recipients of gifts are obliged to notify and seek approval with an email from their line manager while copying HR Department, stating company/name of person that has offered the gift, estimated value and type of gift. HR department then maintains a list with all gifts received and offered.
- All gifts that are not eligible with these policies should be returned to the sender.
- D Marin Employees may participate in meals/training/lunch and meetings which may not be regarded as gifts and which may be acceptable in the business world and are of a reasonable standard, upon approval of their department managers.
- D Marin employees may participate in events sponsored by sub-employers, suppliers, consultants, banks, competitors or customers and affiliated entities of such persons, ensured that there are no conditions which may affect their impartiality and decisions. For all employees and executives at all levels, status of participation in all such events are shared with and recorded by the local Human Resources department.
- D Marin suppliers should not accept gifts from employees no matter their status in the company above the above stated limits. Neither can they offer third parties gifts and hospitality on behalf of D Marin.
- In exceptional circumstances where local cultural values in our operations require mutual exchange of gifts above the limits determined by the company policy; gifts may only be accepted on behalf of the Group and upon approval of the Group's CFO
- Local Human Resources departments report to the HR Director and the Code of Conduct Committee once a year regarding all gift records.

### Giving Gifts

- D Marin employees or suppliers/contractors are prohibited from giving money on loan or otherwise to sub-employers, suppliers, consultants, competitors or customers and public officials.
- D Marin may bear the travel costs, event expenses of employers, sub-employers, suppliers, consultants, banks, competitors or customers and affiliated entities of such persons and similar payments only upon approval of the D Marin Global Services management team (C-suite) of the relevant function. All such expenses are shared with and recorded by the Human Resources department.
- Value of gifts may not exceed EUR 50 per person. Exceptions can be approved by upper management and must be recorded. (The maximum values of the gifts may not exceed the thresholds determined by the related country's Regulations)
- Giving or offering gifts or benefits which are clearly meant for a favor is strictly prohibited.

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- Giving/offering bribe and/or commissions is not accepted under any condition.

D Marin involved parties (employees / suppliers etc) may give gifts which are given for reasons such as sale campaigns, promotional activities and which do not exceed EUR 50 in value. Exceptions can be approved by upper management and must be registered.

### 4.4. Travel and Expenses

There are rules set out regarding travel and expenses that can be claimed for business reasons.

When travelling, it is important to find the right balance between company's business need, environment impact, financial cost and personal health & safety.

Travelling should always occur through the local assigned travel agency. Permission for travelling should be gained prior to any booking.

Regular travelling from and into your place of work cannot be reclaimed.

Travelling for business with partners, family members or friends though not prohibited, cannot be reclaimed in terms of expenses.

### 4.5. Confidentiality of information

Information on D Marin cost structures, pricing and sales, etc. are vital for our business and provide us an advantage over our competitors. This is the reason all business secrets must be kept confidential and safe. Similarly, we respect the business secrets of our competitors, business partners and other third parties.

To protect D Marin secrets, we must also prevent unauthorized access to our IT systems.

Employees should lock devices when away from their desk, not share passwords with anyone and not leave documents that contain sensitive information unattended.

Never click on links or download without knowing who it comes from and report any suspicious behavior to our IT department.

Protect your devices from loss or theft and inform the IT immediately in such an instance.

Do not use personal accounts to store confidential information.

## 5. COMPLIANCE WITH LOCAL LEGISLATION

All D Marin Group companies and their employees as well as suppliers are obliged to act in compliance with the local and international rules and regulations. The D Marin Group companies are obliged to submit accurate, complete and comprehensive information to government agencies and institutions in a timely manner.

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The persons/entities covered under this policy are not permitted to commit illegal acts for the sake of gaining commercial or personal interests.

It is essential that the financial and commercial records are correct and in compliance with the law.

Transactions carried out with governmental authorities are determined by special legal rules and differ from affairs conducted with the private sector. Company employees are responsible for knowing and understanding such rules. In case of doubt, it is essential to consult the Company's Legal Counsel or the Code of Conduct Committee.

### 5.1. Competition Laws

D Marin believes in free and fair competition. We expect our employees at all levels to act in accordance with relevant legislation that forbids arrangements with competition that affect trading in the markets.

D Marin employees and suppliers of services or products should never discuss confidential information of D Marin with competitors or be engaged in discussions that might hinder the principles of free competition.

- Honest and ethical competition is aimed to be achieved within the framework of competition laws and ethical rules, whereas unfair competition is avoided. Competition is carried out only on lawful and ethical grounds.
- In relation to any kind of activities initiated with the representatives of other companies, special sensitivity is paid to ensure that such shall not amount to an infringement and competition rules are all the time well-respected.
- Attempts to restrict or limit competition are not supported.
- Intentional slander and defamation of competitors are not accepted. Any undertaking regarding any services that D Marin cannot provide shall be avoided.
- Since the rules are complex and differ from one country to another, employees should consult the legal department to request explanations and information when necessary.

### 5.2. Sanctions

D Marin and partner companies must comply with sanctions laws in multiple countries. These laws prevent D Marin dealing with certain people, companies, countries and regions.

There may be extra requirements and restrictions for US citizens and US stakeholders, please consult with Group legal or finance team for details.

## 6. FINANCIAL INTEGRITY

D Marin and its employees should only spend company funds where there is a legitimate business need and where the cost justifies the benefit.

Managers and C-Suite employees have an additional duty to ensure that their teams manage budgets well and spend company resources with caution. The following elements should be taken into consideration when assessing the benefit

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of an expenditure: cost, quality, reliability, sustainability, compliance with the Code of Conduct and commitment to its terms and conditions.

### 6.1. Principles of Saving

It is D Marin Group's principle to prevent waste and to promote savings in its use of resources within its activities and during projects it conducts. These principles are taken into consideration in decision making processes with respect to business and internal audits.

### 6.2. Using company's assets

D Marin Group not only protects its own rights but also respects others' assets and rights. D Marin Group endeavors not to work with parties which may damage the Group's virtues and assets, do not comply with the Code of Conduct and/or do not behave in accordance with the environment and health of society. They ensure that D Marin's assets/resources are used efficiently during working hours for business purposes only.

### 6.3. Committing to contracts and expenditure

D Marin employees should not commit the company to a contract or expense without ensuring the appropriate authorization first. D Marin suppliers, consultants and collaborating parties should get approvals of contracts and invoices only through the officially authorized members in each country.

Delegation of authority applies to all approvals for contracts, the document details the level of authority required to commit the company and its resources.

For any contractual commitments or expenses on behalf of the company, there must be relevant approval.

## 7. PUBLIC COMMUNICATIONS

### 7.1 Speaking on Behalf of D Marin

D Marin commits to communicate openly and transparently to all stakeholders within the boundaries of commercial confidentiality. All confidential information needs to be protected from improper disclosure that might endanger D Marin's reputation or ethical trading.

Only people that are authorized by delegation of authorities with the related subject may represent D Marin before the public within the scope of the conditions and matters of the subject that they are authorized for.

### 7.2 Privacy

D Marin values privacy. D Marin commits to processing personal data of employees and customers with integrity and in line with applicable laws.

Confidential information may be defined as; financial, strategic, technical, commercial, personnel rights, matters within the scope of confidentiality agreements executed with third parties and similar information; which belongs to D Marin

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Group not known by third parties and if known, may cause loss for the Group and/or its stakeholders or may benefit others.

The following information which is not announced or made available to the public by the Group is considered confidential information:

- Employee information, inventions, agreements, strategic and business plans, significant changes in management, new products launched in the market, mergers and acquisitions, technical specifications, pricings, offers, financial data, costs, information, transactions, computer software, technical information, materials, records, files, documents, programs, reports, notices, announcements, analysis, data, customer lists, commercial secrets and similar information belonging to D Marin and third parties with whom business affairs are conducted and which are not available to the public are considered confidential information.

All D Marin employees and those suppliers/consultants that are legally delegated to have access to any of the above information are expected to protect them and use them for D Marin purposes only.

All above mentioned parties need to show diligence for the protection of information belonging to the D Marin and all its stakeholders.

Our employees maintain and keep the information and professional secrets they obtain during the performance of their duties in accordance with the confidentiality policy; and share such information with the relevant persons within designated authorities only.

Employees leaving the company are not allowed to share confidential information with third parties. They are required to submit all confidential documents and/or electronic copy documents of the company that they obtained during the term of their employment.

D Marin consultants need to demonstrate the same diligence in maintaining and sharing information as employees.

The company respects the use of employee information according to the local laws in place.

All employees through appropriate training need to:

- understand the principles that apply to their respective roles
- base their day-to-day decisions on the confidentiality principles
- incorporate the privacy principles in the design and delivery or any potential service
- ensure appropriate data management practices

## 8 EMPLOYEES

### 8.1 Human Rights

D Marin Group believes in and supports human rights absolutely in all places and environments it operates.

D Marin Group complies with the "International Labor Rules". In this respect, it adopts to the «minimum age for employment» in line with the local law anywhere it operates.

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Also, in this respect, our group makes no discrimination with respect to ethnic origin, gender, color, race, nationality, economic status, disability, age, religion and other beliefs. This is also applicable for recruitment and promotion; working conditions; and all relationships with customers, suppliers, and partners.

D Marin employees have the freedom to have a role and act as volunteers in non-governmental organizations and public interest services and other associations/organizations, by considering the working hours, sense of duty and responsibility. Additionally, everyone has freedom of right to assembly.

We expect that our suppliers/ consultants show the same respect and diligence with the human rights of their employees.

### 8.2 Our HR Practice

We aim to create an inclusive environment where everyone feels respected and valued and can truly belong.

To ensure human resources management of high standards, the fundamental principles of D Marin Group are summarized below:

- For the enhancement of the working environment, D Marin supports its employees to freely express themselves and undertakes the development of a relationship of mutual trust at all levels. All employees are entitled to work in a healthy; harassment-free environment per the legal regulations.
- In recruiting and promoting its employees, D Marin considers the qualifications and skills required by the job and the performance of the person; as the fundamental tenet.
- It complies with the relevant rules and regulations in respect to employment of the disabled and arranges supporting activities for their employment.

### 8.3 Diversity and Inclusion

D Marin pursues equality of opportunity and inclusion for all employees through our employment policies and practices.

At D Marin we recognize and celebrate the importance of diversity in our workspaces so that we are as diverse as the customers we serve. We will not tolerate any form of discrimination especially related to but not limited to age, gender, race, disability, gender identity, sexual orientation, cultural background, or belief. We base relationships with and between employees as well as suppliers/consultants on respect for individuals and their human rights. We will not tolerate any form of child labor.

D Marin urges the challenge of discriminatory behavior when it is seen. We want everyone to feel able to raise any concerns.

- Act fairly and show respect towards others in all your dealings
- Challenge discriminatory behavior

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- Raise any concerns through your local HR team or the Speak up process
- Base any employment decision you make purely on merit.

### 8.4 Harassment and bullying

At D Marin we want everyone to feel able to raise any concerns and challenge discriminatory behavior when it is witnessed.

Even if there is no superior-subordinate relationship, D Marin absolutely prohibits all kinds of sexual or moral harassment, all acts classified in the International Labor Organization's report under "Violence at Work" and actions deemed as "mobbing" – details at [International Labor Organization \(ilo.org\)](https://www.ilo.org)

#### 12.1.1.1 8.5 Working outside the Company

D Marin employees may not accept any public or private, permanent or temporary, paid/unpaid duty outside the company when working in a second job whether or not it creates conflict of interest, or the third party is in competition with D Marin.

To ensure that working in a second job does not cause any ethical misconduct, it is obligatory for the employees to inform the Human Resources Department with written notification to prevent any potential damages.

Additionally, if the second job is of different nature or industry in which employee is running in D Marin, the employee is permitted to work, provided that the following conditions are satisfied concurrently:

- It shall be evaluated and approved in writing by the management if working in the second job creates a conflict of interest.
- Opinion of the supervisor of the employee and the Human Resources to the effect that there is no decrease in the performance in the current situation,
- The person is not engaging in any activity with respect to the second job during working hours.

Employees may take offices in educational institutions to share their professional experiences provided that the above-listed conditions are satisfied.

Employees may take offices as volunteers in philanthropic and non-profit organizations so long as it does not hinder their duties within D Marin Group.

## 9. HEALTH, SAFETY AND ENVIRONMENT

### 9.1 Key elements

D Marin is a socially responsible corporation that respects the environment, complies with environmental standards and rules, and constantly intends to reduce energy consumption and carbon dioxide emissions.

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Considering the principles of «Occupational Safety First» and «Respect for the Environment and Future Generations» in line with our aims and targets, we, as D Marin;

- Identify health, safety and environmental risks in our activities; take precautions; and control their effectiveness in order to prevent health deterioration, occupational accidents and environmental pollution.
- Comply with the relevant legislations regarding the environment, health, and safety; and abide by the requests made by the relevant parties.

Train and inform everyone who is affected by D Marin's health, safety and environment policies and procedures; and verify that they understand all.

None of the individuals or executives within our Group has the authority to behave in an inconsistent manner with the environmental protection policy, to permit any such behavior, to give instructions for such effect or to tolerate the same. We expect our suppliers and contractors/consultants to abide to the principles of Health and Safety and apply them in diligence.

### 9.2 Drugs and Alcohol

Any use, sale or distribution of alcohol and illegal substances while working will be treated extremely seriously. Please support your colleagues by reporting any breaches of this code to your local HR team. D Marin commits to provide support to those affected by problems with alcohol or drugs.

## 10. COMMUNITIES

D Marin Group's high performance, productivity and profitability in fields of its activity are not only the Group's commercial success, but also its substantial contribution to the economies of countries in which it operates.

D Marin Group has chosen to work in a manner committed to the principles of social responsibility and "sustainability". In addition to the above, the concept of Sustainable Development also includes the principles of productive and profitable work and planning for the company's future. D Marin plans its responsibilities towards the society within the principles of "sustainability" and contributes to the society with a sense of social responsibility.

## 11. SUPPORTING DOCUMENTS

- Gifts and Hospitality Registry

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### 12. KEY PERFORMANCE INDICATORS

KPI	Measurement	Target
Number of informed employees	% of employees that have attended the Code of Conduct training	100%
Number of reported concerns	# of cases reported in speak up line	
	% of substantiated cases	
	% of cases that resulted in Disciplinary action	

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### ANNEX

#### A. Relationships with Customers Within D Marin Group;

- Customer information is protected with the same sensitivity as if it were D Marin's own information.
- Customers are approached with customer satisfaction point of view. All customers are treated with care, honesty and fairness that will generate the highest level of customer satisfaction loyalty.
- Customers' requests and expectations are taken into account and customer-oriented processes, products and services are structured accordingly.
- Customers' requests are approached proactively in accordance with the agreed terms. It is aimed to meet requests in a timely and accurate manner by constantly improving product and service quality based on the customer's needs.
- Products and services offered are under D Marin Group's assurance and guarantee.
- All customers are approached on the same grounds and are not treated preferentially. Customers are not provided with any tangible or intangible benefits such as unfair promotional and marketing allowance, gifts, etc.

#### B. Relationships with Suppliers at D Marin Group;

- It is believed that the goods and services provided by suppliers directly affect the quality of the goods and services of D Marin. In this respect, suppliers are selected among the entities operating at the desired quality and standards. For this reason, suppliers are considered as business partners.
- Supplier selection process is transparent and impartial.
- Current suppliers and suppliers that may be considered as potential vendors are treated in a fair and respectful manner. Necessary care is taken to meet the obligations on a timely fashion.
- Confidential information of suppliers with whom business is conducted with is protected with care.
- No business is conducted with suppliers that are identified as having violated laws and not having behaved in accordance with business Code of Conduct.
- Suppliers, brokers, sub-contractors may not be used to commit an act which is contrary to laws or Code of Conduct. It is unacceptable for employees to receive commission payments and any tangible or intangible benefits of similar nature from suppliers.
- Employees are not permitted to accept gifts which may adversely affect their objectivity on making decisions.
- While conducting their relationships with suppliers; employees act in a manner to avoid any impressions that may cause third parties to think that there is a relationship based on interest.

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### C. Relationships with Shareholders at D Marin Group,

- Shareholder relations are based on principles of trust and transparency.
- The primary purpose of the company management is the creation of perpetual value for shareholders.
- Financial data or all kinds of information necessary for decision-making must be communicated in an accurate and complete manner. People preparing such information are responsible for the information they prepare and must ensure that the related principles are complied with.
- It is essential to ensure that all business and finance records of the company are accurate and in compliance with D Marin policies and procedures as well as laws and regulations. Such principles are applicable not only for financial accounting records, but also quality reports, timing records, expense reports, claim forms and curriculum vitae and all other similar records.
- All kinds of information or events (lawsuits, etc.) that may have a financial impact must be promptly notified to the Finance and Legal Department.
- No record, under any circumstances, may be distorted and fictitious records may not be entered in the books. No asset or property that is not registered in the name of D Marin may be kept.
- Shareholder's expectations from the top management, instructions, decisions taken and implementations regarding such decisions are stated mutually in writing.