

# GLOBAL PORTS HOLDING PLC

## ENVIRONMENTAL POLICY

<b>Revision</b>	<b>Date of Publication</b>
V.1	April 2017

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### 1. PURPOSE AND SCOPE

#### INTRODUCTION AND PURPOSE

The purpose of this Environmental Policy ("Policy") is to explicitly state Global Ports Holding PLC ("GPH PLC" or the "Company"), Global Ports Holding A.S. ("GPH AS") and their respective affiliated companies (unless stated otherwise, "Group" or "GPH" covers GPH PLC, GPH AS and all of their respective affiliates (subsidiaries, jointly controlled entities and associates)) approach to environmental awareness and practices. With this Policy, our Group aims to ensure compliance with environment-related laws and regulations, international regulations, and the legal regulations and ethical principles in the countries where it operates, as well as to determine relevant responsibilities and rules.

#### SCOPE

The Group expects all its affiliates and joint ventures to act in accordance with this Policy.

This Environmental Policy covers the following individuals and organizations:

- The Group's Board Members,
- The Group's executives and employees,
- The Group's subsidiaries, jointly controlled entities and affiliates including their 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.

### 2. DEFINITIONS

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

**Employee:** The Group's employees.

**GPH AS:** Global Ports Holding A.S.

**GPH PLC:** Global Ports Holding PLC.

**Group:** Global Ports Holding PLC, Global Ports Holding AS and their respective affiliates (subsidiaries, jointly controlled entities, associates).

**Senior Management:** The Group's Board Members and executives.

**Service Provider:** Companies (suppliers, subcontractors, 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 for approving the Policy, along with supervising the determining and operating notifications, examinations, and enforcement mechanisms for non-compliance with rules and regulations.

#### Senior Management

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Senior Management is responsible for implementing the Policy.

Senior Management is also responsible for enforcing and auditing policy-related practices, as well as for taking necessary measures to ensure the compliance of employees and external service providers with this document, and reporting infractions to the Compliance and Internal Auditing Department for inspection.

Senior Management consists of the Chief Executive Officer and other C level officers of the Group as indicated in the organizational chart.

### **Legal Department**

The Legal Department evaluates the policy with regard to its relevance and areas requiring improvement, and submits suggestions to Senior Management.

### **Employee**

Employees are responsible for:

- Adherence to and compliance with the Group's policies, regulations and procedures,
- Working in compliance with the current legislation,
- Notifying the Compliance and Internal Audit Department in cases where conduct, activities or practices that are in breach of the Policy are encountered.

### **External Service Providers and Joint Ventures**

It is mandatory for external service providers, suppliers and joint ventures to ensure compliance with the principles set out in this Environmental Policy, and other relevant regulations.

### **Corporate Communications Department**

This Policy is published on the corporate portal. The Corporate Communications Department is responsible for its publication.

### **Human Resources Department**

The Policy set out herein is distributed to the entire staff; the Human Resources Department is responsible for its distribution.

### **Investor Relations Department**

The Investor Relations Department is responsible under this policy for the organization of the Group's relationships with institutional investors, portfolio managers, analysts, and current and potential shareholders; and undertaking public disclosure practices for all interested parties in a simultaneous and transparent manner. The Investor Relations Department is responsible for publishing this Policy on the Company website.

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### 4. OUR COMMITMENTS

#### **The Group:**

- Abides by the principles and guidance of the European Bank of Reconstruction and Development with respect to Environmental and Social Policy, as published from time to time, insofar as the same are compatible with the operations of a public listed company.
- Carries out its port activities in accordance with the environmental legislations and international standards.
- Is committed to managing and reducing the environmental impacts of its business activities and continuously improving its environmental performance.
- Aims to reduce its greenhouse gas emissions to minimize its impact on climate change.
- Carries out activities to reduce its air emissions.
- Aims to lower the water consumption and use of natural resources while using them in the most efficient way in all its operations. The Group will treat and discharge water emissions (wastewater) in accordance with legal obligations.
- Conducts activities to assess, reduce and recycle waste resulting from our activities at the source, and dispose of them as required by relevant legislation.
- Conducts activities to reduce energy use and increase energy efficiency in all stages of its operations.
- Is aware of the importance of its stakeholders, adopts the principle of informing all stakeholders of our environmental policy, approach and performance through reports and announcements. The Group will organize training to raise awareness among our employees and suppliers.
- Monitors and audits its environmental performance through the Environmental Management System. The Group will continuously monitor our operations, identify areas for improvement, and set targets.
- Ensures stakeholder participation, by consistently enhancing its environmental performance through feedback shared at annual meetings or current communication channels regarding environmental policy and activities.
- Discloses its environmental performance on the website in an explicit and transparent manner.
- Works in accordance with best practices in the industries in which the Group operates.

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### 5. NOTIFICATION OF NON-COMPLIANCE, FEEDBACK AND SUGGESTIONS

To communicate your reports, opinions and suggestions on this Environmental Policy, kindly email [surdurulebilirlik@global.com.tr](mailto:surdurulebilirlik@global.com.tr). You may also use the communication channels listed in the CONTACT POINTS section of this policy.

### 6. MONITORING, AUDIT AND IMPROVEMENT PROCESS

This Policy is regularly reviewed by the Remuneration Committee while the practices are continuously monitored, and relevant assessments are reported annually.

### 7. ENFORCEMENT

This Policy was adopted by the Board of Directors resolution on.....April 2017.

### 8. CONTACT POINTS

#### **Legal Department:**

Uğur Aydın

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E-Mail: ugura@global.com.tr

#### **Compliance and Internal Audit Department:**

Menduh Atan

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#### **Human Resources Department:**

Göknil Akça

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