


HUMAN RESOURCES MANAGEMENT

YS.P106 THE CODE OF ETHICS




Document Owner	Human Resources Management
Responsible Person	Yasin ATAK
Title	Human Resources Manager
E-mail Address	yasinatak@mersinport.com.tr
Location of the master document	Hard Copy – HR Management Office Soft Copy – SharePoint – 27_Announcement – HR – YS.P106 The Code of Ethics

**Mersin
International Port**

 MIP <small>OPERATIONAL INTERNATIONAL PORT</small>	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	1 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

CONTENT

1. OBJECTIVE	2
2. SCOPE.....	2
3. REFERENCES.....	2
4. DEFINITIONS	2
5. RESPONSIBILITIES.....	3
5.1 EXECUTION AND DISTRIBUTION.....	3
5.2 USERS	3
5.3 ABROGATION AUTHORITY.....	3
6. GENERAL PROVISIONS.....	3
6.1 APPLICABILITY	3
6.2 COMMITTING TO THE CODE	4
6.3 OUR CORE VALUES AND ETHICAL FOUNDATION	4
6.4 BUSINESS PRINCIPLES.....	5
6.5 ETHICAL DECISION-MAKING.....	5
6.6 OUR RESPONSIBILITY TO ONE ANOTHER	6
6.7 INTEGRITY OF ACCOUNTS	6
6.8 WHISTLEBLOWING	6
6.9 USE AND PROTECTION OF RESOURCES.....	6
6.10 USE OF TIME.....	7
6.11 ALCOHOL AND DRUGS.....	7
6.12 RELATIONS WITH THE CUSTOMER	7
6.13 RELATIONS WITH THE SUBCONTRACTORS AND SUPPLIERS	8
6.14 PREVENTING BRIBERY AND CORRUPTION.....	8
6.15 GIFTS AND HOSPITALITY	8
6.16 RELATIONS WITH PUBLIC INSTITUTIONS AND ESTABLISHMENTS	9
6.17 POLITICAL DONATIONS.....	9
6.18 CHARITABLE DONATIONS/SPONSORSHIP	9
6.19 RELATIONS WITH THE MEDIA AND CSOs	9
6.20 SOCIAL MEDIA	10
6.21 ANTI MONEY LAUNDERING, COUNTER TERRORIST FINANCING AND SANCTIONS.....	10
6.22 RELATIONSHIPS WITH THE COMPETITORS	10
6.23 REFRAINING FROM ACTIVITIES CAUSING UNJUST COMPETITION.....	10
6.24 CONFLICT OF INTERESTS.....	11
6.25 PROHIBITION TO WORKING ANOTHER JOB	11
6.26 RESPECT TOWARDS EMPLOYEES RIGHTS	11
6.27 TEAMWORK.....	12
6.28 PRINCIPLE OF CONFIDENTIALITY OF COMPANY INFORMATION	12
6.29 PRINCIPLE OF CONFIDENTIALITY OF PERSONAL INFORMATION	12
6.30 COMMERCIAL SECRETS	13
6.31 MISUSE OF AUTHORITY	13

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	2 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

6.32	INTERFERING AGAINST THE ILLEGAL CASES OR DEMANDING FOR INTERFERING AGAINST IT	13
6.33	OCCUPATIONAL HEALTH AND SAFETY.....	13
6.34	RESPONSIBILITY TOWARDS THE NATURE AND THE ENVIRONMENT	13
6.35	REPRESENTATION OF THE COMPANY.....	13
6.36	EXERCISE OF AUTHORITY.....	14
7.	DISTRIBUTION AND FILING	14
8.	REVISION HISTORY	14

MERSİN INTERNATIONAL PORT

Prepared by	Checked by	Approved by
 Yasin ATAK Human Resources Manager	 Yüksel Nuri PEKER Head of Corporate – HR & Governmental Relations	 Johan Van DAELE General Manager

1. OBJECTIVE


The principles of right and wrong that guide an individual in making decisions are called “ethics”. Ethical decision-making is essential to the sustainable success of our company. The objective of this procedure is to introduce the relationship between the principles and code of ethics inside the company to the employees working at the workplaces of “Mersin Uluslararası Liman İşletmeciliği A.Ş. - Mersin Denizcilik Faaliyetleri ve Ticaret A.Ş. and Mersin Pilotaj ve Denizcilik Faaliyetleri A.Ş.”, secure development of Code of Ethics inside the company and to ensure that refrainment of the employees from illegal actions.

2. SCOPE

This procedure covers all employees working at the workplaces of Mersin Uluslararası Liman İşletmeciliği A.Ş., Mersin Denizcilik Faaliyetleri ve Ticaret A.Ş. and Mersin Pilotaj ve Denizcilik Faaliyetleri A.Ş.

3. REFERENCES

Labor Law No 4857, Marine Law No 854, Social Security and General Health Insurance Law No 5510 and other legislations about the work life.

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	3 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

4. DEFINITIONS

Workplace: All corporate workplaces included under this procedure.

Personnel: The Employees working under a labor contract who are included under the procedure.

Employer: MIP Mersin Uluslararası Liman İşletmeciliği A.Ş. - Mersin Denizcilik Faaliyetleri ve Ticaret A.Ş. - Mersin Pilotaj ve Denizcilik Faaliyetleri A.Ş.

Senior Management: General Manager, Directors, Group Managers

Manager: Managers and Deputy Managers.

Administrative Personnel: Senior Specialist, Specialist and others who work for a fixed monthly salary.

Applicable Legislation: Laws regulating industrial relations and by laws such as regulations and circulars as well as other regulations and procedures in force under the corporate internal law.

Regulations: Regulations consisting of all procedures put in force subject to approval by the General Manager in the frame of the corporate internal law.

Procedure: Regulations which include ways and methods of carrying out occupational practices in the frame of the applicable legislation and are put in force subject to approval by the General Manager for the purpose of composing the corporate internal law under the Labor Law, article 22 and the Code of Obligations, article 399.

5. RESPONSIBILITIES

5.1 Execution and Distribution

The Human Resources Management shall be responsible for the elaboration, updating whenever required to do so, enforcement and distribution of this procedure in coordination with relevant units. Approval procedures for updated procedures shall be carried out by the General Manager.

5.2 Users


Users of this procedure are all the personnel employed in all workplaces subordinate to the employer.

5.3 Abrogation Authority

This procedure can be altered or abrogated according to the needs or when it needs to be altered should be abrogated. The power of approval in this process is vested in the General Manager.

6. GENERAL PROVISIONS

6.1 Applicability

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	4 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

The Code of Ethics states how business should be conducted and sets out guidance on the standards of behaviour expected of all MIP employees, especially when faced with situations of improper, illegal or unethical conduct.

Under The Code of Ethics, all employees must comply with applicable laws and authorities, always observe properly incurred duties to third parties and act in accordance with the highest standards of ethical, personal and professional conduct. No employee may engage in improper behaviour or any conduct that would otherwise bring MIP into disrepute.

To use The Code of Ethic, first read through the entire manual, then think about how it applies to your job. Be specific and think in terms of how you might handle situations to avoid improper, illegal or unethical actions. Within The Code of Ethics are case studies and questions intended to encourage open discussion and to deepen your understanding of what it means to adhere to The Code of Ethics.

6.2 Committing to the Code

All employees have access to The Code of Ethics in print or soft copy and are responsible for fully understanding its contents.

EVERY EMPLOYEE IS BOUND TO THE CODE AND MUST COMPLY STRICTLY WITH IT AT ALL TIMES.

Violation of The Code will not be tolerated and violators will face disciplinary action, which may include dismissal by MIP. Where local laws are also breached, violators will be reported to the relevant authorities. In cases involving monetary losses, MIP may pursue the recovery of such losses.

If you have an enquiry or clarification to make, please contact Human Resource or Internal Audit and Risk Management. All enquiries will be handled discreetly and every effort will be made to maintain the confidentiality of information within permissible legal limits.

6.3 Our Core Values and Ethical Foundation

The Code of Ethics articulates the ethical standards – the principles of right and wrong – that should guide our business conduct (“how we do business”) in being true to our core values.

Our Core Values

In all our relationships and actions, we choose to demonstrate our steadfast commitment to our corporate values:

COMMITTED TO EXCELLENCE

- We set new standards by continuously improving results and innovating in every aspect of our business.

DEDICATED TO CUSTOMERS

- We help our customers, external and internal, succeed by anticipating and meeting their needs.

FOCUSED ON PEOPLE

- We win as a team by respecting, nurturing and supporting one another.

INTEGRATED GLOBALLY

- We build our strength globally by embracing diversity and optimising operations locally.

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	5 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

6.4 Business Principles

MIP supports free enterprise and a competitive market system. Our business decisions are based on sound economic principles and reliable market research, with a view to long-term profitability and creating sustainable value.

MIP is committed to staying ahead of competition through constant innovation and efficiency enhancements as well as being sensitive and responsive to our customers and partners and their welfare and interests, and with a commitment to safeguarding the environment and communities which we operate in.

It is MIP's policy to comply with all competition and fair trading laws in the jurisdictions in which it operates.

Employees must refrain from any discussion, communication, information sharing or agreement related to strategic information that would violate competition laws including but not limited to the following:

1. Pricing policies, bids, discounts, terms of sale
2. Customer lists
3. Production costs or volumes
4. Marketing plans
5. Risks and investments
6. Technologies and results of research & development programs

6.5 Ethical Decision-Making

The principles of right and wrong that guide an individual in making decisions are called "ethics". Ethical decision-making is essential to the sustainable success of our company. When faced with an ethical dilemma or when uncertainty arises, ask yourself the following questions:

- Would mip's reputation be at stake if the public knew about this?
- Would it be seen as being illegal or unethical?
- How would my family or friends feel if they knew?
- Is it in compliance with the code?

You should use the following three-step checklist as a guide to collecting the relevant information in order to decide upon the ethical course of action in business situations. If still in doubt, you can consult Human Resource Management.

STEP 1. IS THE ACTION ILLEGAL? DOES THE ACTION VIOLATE ANY LAWS?

You must comply with all applicable laws and regulations.

STEP 2. DOES THE ACTION VIOLATE COMPANY OR PROFESSIONAL STANDARDS?

Laws and regulations often set only minimum standards of behaviour. Many businesses and professions and/or company policies and procedures set even higher standards of behaviour. Thus, an action may be legal, yet still violate the standards of the business or profession and/or the company policies and procedures. You must meet your business and professional standards, and MIP's policies and procedures.

"Just because it's legal, doesn't mean it's ethical."

STEP 3. WHO IS AFFECTED, AND HOW, BY THE ACTION?

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	6 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

If an action is legal and complies with business and professional standards, you must rely on your principles of right and wrong to determine if the action is ethical. Determining how the action affects individuals and groups – including the business, employees, owners, customers, the local community and society – will help you decide if an action is ethical.

6.6 Our Responsibility to one Another

As Employees, we expect you to do your utmost to create a respectful workplace culture that is free of accidents, harassment, intimidation, enmity, bias and unlawful discrimination of any kind.

Not only are you not supposed to engage in behaviour detrimental to peace and harmony in the workplace, you have a responsibility for the safety and welfare of your co-workers and should keep watch for them.

6.7 Integrity of Accounts

MIP has the highest regard for truth, completeness, accuracy and timeliness in the recording of business transactions to maintain the integrity of the Company's financial reporting and support internal decision-making.

At all times, financial records must comply with recognised accounting standards and financial transactions must be executed only in accordance with management's authorisation, Finance Policies and all relevant finance directives.

No payment shall be requested, approved or made with the intention that any part of such payment will be used for any purpose other than as described in the document supporting it.

6.8 Whistleblowing

As part of our commitment to uncompromising integrity, MIP has established the whistle blowing channel for its employees, business partners and others to report any concerns they may have regarding compliance with The Code of Ethics, or the laws and regulations that govern MIP's business.

This channel seeks to protect the person reports a misconduct or malpractice within the MIP, from any form of disadvantage and aims to initiate an investigation into misconduct and malpractice.

It is important that the employees communicates the question or concern through available channels which are mentioned below;

Email: ihbar@mersinport.com.tr


Wp or Mobile Phone: 05331552415

Via MIPConnect Intranet, Mail, Notification to the Line Managers

If you have an enquiry or clarification to make, please contact Internal Audit and Risk Management.

6.9 Use and Protection of Resources

The interest of MIP/MMI & MMP shall be taken into consideration in the use of company resources. The company assets, facilities and employees cannot be used for any purpose other than the company works and company's objective except for the benefit of MIP/MMI & MMP in any way notwithstanding what the benefit is and who benefits from it. Principle of "economy in all subjects" is applied in the form of the superior constituting a model to the subordinate. Vehicles, equipment and fixtures allocated to the use of employees by the company must be used in conformity with the procedure in a careful manner.

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	7 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

Employees cannot endanger work safety deliberately or with its carelessness or neglect. Employees must use the vehicles, goods, cash, materials, tools, devices and other assets located at the workplace, which belong to the company and which are handed over or presented to the use of the concerned employee, in conformity with criteria and instructions (including the safety regulations) of the company for the work, and must exercise due care and refrain from deliberate wastefulness and losses.

Employees shall not be entitled to install licences or non-licensed programs on to the computers allocated to their use without informing and obtaining the consent of the Information Technology Management. Users shall refrain from entering internet sites which are not in conformity with the objective of use of the hardware and software, which are not related with the work, do not have a corporate structure, do not fulfil the security requirement or which may be considered as piracy sites.

6.10 Use of Time

Employees shall use the time in favour of the company during the work hours; and cannot allocate time for personal work during work hours. Managers cannot assign the employees to their personal works.

Employees shall show maximum care towards the defined work hours. In essence, visitors are not to be accepted during working hours, excluding those related with the work. Employees shall be required to conclude the visits of compulsory visits in relation with the subject of the visit and in a reasonable period that does not hinder the work flow.

6.11 Alcohol and Drugs


The use, possession, distribution, purchase or sale of alcohol or drugs (excluding medicine) by any person while on company premises, or while operating company equipment is prohibited.

Alcohol consumption during the events made by company is subject to the approval of the General Manager. Any person under the influence of alcohol or drugs is prohibited from entering company premises, engaging in company business or operating company equipment.

6.12 Relations with the Customers

Employer have adopted ensuring customer satisfaction by securing service quality and fulfilling the customer's needs and expectation as its principle. Employer fulfil its commitments and liabilities under all conditions. Employer shall act with due care of the following issues in its relations with the customers, in line with said principles:

- a) No processes can be realized without the customer being informed even if it is to the benefit of the customer.
- b) Employer cannot benefit from the customer's weaknesses even if it is to the benefit of employer and the customer cannot be misinformed or misguided with a profit motive.
- c) Property and goods belonging to the customer or which are placed in safekeeping by the customer cannot be damaged; the information related with the customer shall be kept confidential in line with the principles of confidentiality.
- d) Relations with the customers shall be realized in strict conformity with principles of courtesy.
- e) Customer complaints shall be evaluated and solved as soon as possible.
- f) Employees receiving a complaint from the customer shall forward the complaint to his/her superior if it cannot be solved in his/her field of authorization.

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	8 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

6.13 Relations with the Subcontractors and Suppliers

Subcontractors, suppliers or third persons and their employees working for MIP/MMI-MMP are obliged to act in conformity with the principles and rules stipulated in this procedure along with MIP's policies.

Provisions of the contract shall be applied to subcontractors or suppliers who do not act in conformity despite the necessary warnings. Those who are determined as not acting in conformity with MIP's policies and principles shall not be assigned to the task again. Including the representatives and consultants, the fees paid for the services realized by the subcontractors, suppliers and third persons must be legal and in conformity with the service provided in a way that can be proven.

MIP/MMI & MMP Employees cannot enter business relationships based on personal interest with the subcontractors and suppliers; and cannot borrow or lend money, goods etc. for personal purposes and cannot lend money or goods to the subcontractors and suppliers. Purchase of goods and services with a price which is excessively lower than its value or free of charge from the subcontractor or suppliers for personal purposes or receiving bribes from subcontractor and supplier firms or third persons in order to provide advantages to said firms shall be considered as gaining benefit and shall require the penalty of termination of the employment.

6.14 Preventing Bribery and Corruption

Employees are strictly prohibited from offering or providing any payment of any value, or any advantage of any kind, to any person with the intention of influencing that person to act improperly in connection with MIP, MMI and MMP business, or in order to reward a person for having acted improperly.

Employees are strictly prohibited from asking for or receiving any payment of any value, or any advantage of any kind, with the intention of carrying out an activity improperly, or as a reward for having acted improperly in connection with MIP/MMI and MMP business.

Acting improperly includes performing a task that is within the scope of the Personnel's duties, more quickly or in some other way more favourably towards the other person than would otherwise be the case.

Employees must familiarise themselves with, and comply with, the Anti-Bribery and Corruption Policy.

6.15 Gifts and Hospitality

a) Gifts and hospitality from subcontractors or suppliers

Employees are prohibited from asking for or receiving any gifts of any kind, or hospitality, from MIP's subcontractors or suppliers, unless they fall within an exception set out in the Anti-Bribery and Corruption Policy.

Detailed information can be found in Anti-Bribery and Corruption Procedure.

b) Gifts and hospitality from customers

Employees are prohibited from asking for or receiving any gifts of any kind, or hospitality, from customers, unless they fall within an exception set out in the Anti-Bribery and Corruption Policy. Please refer to the Anti-Bribery and Corruption Policy for more details.

Hospitality may be received from customers if it is of low value, and directly related to a business meeting (e.g. coffee / sandwiches provided at the customer's premises during a meeting).

Detailed information can be found in Anti-Bribery and Corruption Procedure.

Kurum İçi / Kişisel Veri İçermez | Internal / No Personal Information

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	9 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

c) Offering gifts and hospitality

Employees are prohibited from offering or giving any gift or hospitality to any person who is a government or public official (including, without limitation, customs staff, local or national politicians, civil servants, police or judicial staff) without prior approval from the Government Relations Committee. Employees must never offer or give any gift or hospitality to any person with the intention of inducing a person to act improperly in connection with MIP's business, or to reward a person for having acted improperly.

Employees who are offered, or who offer, gifts or hospitality must fully comply with MIP's policy on gifts and hospitality, which is set out in more detail in the Anti-Bribery and Corruption Policy.

6.16 Relations with Public Institutions and Establishments

Employer acts in line with the principles of honesty and transparency in its relations with the public institutions and establishments. MIP acts in strict conformity with the laws, keeps all related records in conformity with the procedure and presents these to the legal establishments when required. When a situation in breach with the laws is observed by any MIP personnel during the company operations and processes, this shall be notified to the senior management as soon as possible.

In order to avoid even the perception of impropriety, employees should avoid meeting with a government or public official on MIP related business without being accompanied by another member of employees, ideally a member of the Government Relations Committee.

Employees interacting with government or public officials must fully comply with MIP's policy on interactions with government or public officials, which is set out in the Anti-Bribery and Corruption Policy.

6.17 Political Donations

MIP is an independent business organisation, has no political affiliations and does not make political donations. Employees are prohibited from offering or providing any payment, or other advantage (such as the use of MIP facilities or labour) to any political party, party official or political candidate, whether national or local, using employer funds, or on behalf of employer.

6.18 Charitable Donations / Sponsorship


Charitable donations, or sponsorship of events, by MIP must never be used as a conduit for paying bribes, or making corrupt payments, in order to influence either a public official or another person to act improperly.

Employees must fully comply with MIP's policy on charitable donations and sponsorship, which is set out in the Anti-Bribery and Corruption Policy.

6.19 Relations with the Media and the Civil Society Organizations

Making a statement, accepting and interview with any broadcasting establishment, attending seminars, conferences etc. to deliver a speech and determining whether are fee shall be received for this purpose shall be subject to the approval of General Manager.

Employees may give tangible or intangible assistance, make donations to third persons and may accept personal awards given providing that this is not in conflict with the company policy and interests. Employees may also participate in charity foundations outside the company providing that this does not interfere with the tasks at MIP.

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	10 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

6.20 Social Media

As the online landscape continues to mature, the ways by which we communicate with one another – including our colleagues, customers, partners – continue to evolve.

Social media create opportunities to champion the MIP brand and also for personal expression, but they also bring with them risks and responsibilities for individuals and the company.

Employee should assume that anything you do on social media – whether on a business or personal account – could be viewed by a colleague, supervisor, partner, supplier, competitor, investor, customer or potential customer.

Your activity on social media reflects on MIP and can impact the work environment.

Social Media Guidelines for every employee to comply with before posting content online, employees should:

- Be aware that the views expressed, even though in your personal capacity, reflect upon MIP.
- Ensure that the content does not include anything confidential and/or commercially sensitive. For example, while you may mention that you work for the Payroll Unit, do not mention details of employee's salaries you may be working on (or details that would point to such plans) that are confidential.
- Refrain from showing or using the MIP logo, brand or trademarks in a negative light.
- Check that the content will not directly or indirectly cause embarrassment or damage, or place a liability, potentially or otherwise, to or on MIP, its management, employees, customers, partners, competitors and any other stakeholders.
- Post only content that is based on facts and such content must be in compliance with all applicable laws.
- Ensure that content is not be misleading, deceptive, offensive, slanderous, defamatory, seditious or obscene.
- Ensure that content does not impinge or cause offence to another's race, culture, ethics, morality or religion, whether illegal or otherwise.

6.21 Anti-Money laundering, Counter-Terrorist Financing and Sanctions


Employer is committed to preventing money laundering and terrorist financing, and to complying with all applicable sanctions and/or trade restrictions. Employees must fully comply with MIP's Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Policy.

6.22 Relationships with Competitors

Relations of MIP personnel with the competitors of MIP shall be within the framework of professional and commercial code of conduct. MIP's personnel shall refrain from actions that may cause unjust competition between the competitors. The personnel shall be obliged to protect the interests of the company by keeping MIP's transactions and processes confidential.

6.23 Refraining from Activities causing Unjust Competition

Employees cannot enter into business relationships regarding MIP with their spouses, relatives and close friends. However, business relationship may be established with the approval of senior management providing that no situations detrimental for the company shall occur. Employees must declare their acquaintances from the current customers, subcontractors and suppliers of MIP in the declaration of Trade / Business Form.

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	11 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

No discrimination or privileges can be provided to persons who do not possess the related qualifications, who are not successful in the exams and interviews and all candidates shall be evaluated under equal conditions. Candidates who are relatives of MIP personnel cannot be employed in the same department.

6.24 Conflict of Interest

A conflict of interest occurs when a company employee, middle or senior manager, provides an undisclosed, hidden economic or personal benefit that will adversely affect his employer from the transactions he performs regarding the Company.

In order to be able to talk about the existence of a conflict of interest, the economic or personal interest provided against the company must not have been disclosed to the employer.

In this type of abuse, the uncovered interest need not always be a personal economic benefit. In some cases, the actions of the employee that will adversely affect the employer may not be for himself, but to benefit a relative.

Employees shall refrain from situations in which personal interests conflict with the company interests and company loyalty. In the event of occurrence of said kinds of conflicts of interest, the related personnel must inform his/her superior and the senior management shall be required to isolate said personnel from the decision or operation related with the task area where the conflict of interest occurs, if necessary.

It is strictly forbidden for MIP personnel to obtain personal gains, either directly or indirectly, from the company procurements, sales activities and any transactions and contracts to which MIP is a party. All employees are obliged to fill in the Commercial Activity / Declaration Of Business Relation form and update it if there is a change in the content of the form.

6.25 Prohibition to Working Another Job

Since the employee allocates their entire time to the employer, they cannot work directly or indirectly in any job during the validity of the employment contract. It cannot be a direct or indirect partner in a company operating in the same business as the employer. He cannot take charge in any company, under any name, or provide consultancy.


Employees can only work in another job with the knowledge and written approval of the senior management. The request to work in another job must be submitted in writing with a petition and the employee must update the declaration of trade / business form.

Under any circumstance, employees cannot enter into a business relationship with their colleagues, with their first-degree relatives, with the personnel of the subcontractor company for profit purposes. Providing services to these people while working in another job, etc. cannot provide financial gain for any reason.

6.26 Respect towards Employee's Rights

The Company does not discriminate or treat differently based on language, race, gender, political opinion, philosophical belief, religion, sect, disability and similar reasons and respects freedom of association, unionization and collective bargaining. The company does not employ child labor and never accepts any discrimination, harassment or intimidation and makes no concessions.

MIP aims to ensure equality of gender and opportunity in all its practices, to eliminate gender gap in the workforce, to ensure equal participation in work, to strengthen the position of women in business life, to

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	12 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

achieve gender balance in roles such as decision-making and leadership. For that reason, equal opportunity committees were established. The Committee, together with its members, works to achieve the targets set at the end of each year within the next year.

6.27 Teamwork

Teamwork and co-operation are important aspects of the work ethics in MIP. We build on our collective skills, knowledge and experience to achieve the best results for our customers, partners and MIP.

“MIP views its employees as its greatest asset and recognises the integral role that unions play in safeguarding the interests of its employees.”

MIP respects the views of unions and seeks the amicable resolution of issues with the unions in a manner that is constructive, open, honest and ultimately beneficial to all parties concerned.

6.28 Principle of Confidentiality of Company Information

All MIP employees shall be obliged to protect the company information, to be aware of the confidentiality levels of the information obtained or known as a result of his/her position and to act accordingly. The opinion of the executive shall be sought in the event of any doubts regarding confidentiality level. All kinds of documents, records, drawings, letters and other documents containing said information cannot be modified or reproduced without the consent of the senior management; cannot be disclosed to any persons or companies outside of MIP; and cannot be damaged or destroyed. Said information cannot be addressed at public locations. Archiving, storage, reproduction, backup processes and measures to prevent its disclosure shall be under the responsibility of the personnel producing and using said information.


At the end of work hours on each day, the documents containing said information on the desks and in the open must be removed and the ones with a high confidentiality level must be locked with the keys kept in a secure place. Secret files cannot be taken outside the company unless in exceptional cases with the approval of the senior management. Computer passwords and user codes shall be kept secret and information backed up in the computer environment shall not be provided to persons other than those authorized. Involvement of personnel in actions that are not coherent with honesty and loyalty such as disclosure of business secrets of MIP shall result in termination of the employment contract.

Confidential information belonging to MIP and its customers cannot be disclosed or used against the company after termination of the employment either. All employees are required to fill out the Confidentiality Commitment and Consent of Personal Data form.

6.29 Principle of Confidentiality of Personal Information

MIP employees shall be responsible for presenting the information and documents required at starting of employment or afterwards in a complete and correct manner as requested. On the other hand, personal information and information related with personnel rights are confidential and can only be used for work purposes by the authorized personnel. Changes in personal information such as address, marital status and contact numbers shall be notified to the HR Management. Said information cannot be disclosed to another person within the company or other persons outside the company. Information specific to the person shall be sent to the employees privately. Employees receiving the confidential information shall keep said information confidential in a way that cannot be acquired by others after reading and shall not disclose said information to others.

All employees are obliged to know and read the Statement on Processing Employee Personal Data Form.

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	13 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

6.30 Commercial Secrets

Employees cannot share information, documents, software, methods or procedures, which provide the technological and strategical competitive power of the employer that have been obtained through either the programmed training works and on the job training and applications with third persons even if after his/her employment is ended.

6.31 Misuse of Authority

Misuse of authority is causing the loss of MIP and customers as a result of the personnel using his authority and responsibility for his own interest or outside the tasks expected from the personnel. Company employees are required to notify any actions and behaviours in breach with ethics, laws and the company's discipline code to their superiors or to the supervision organs designated inside the company and to the senior management if a conclusion cannot be achieved.

6.32 Interfering against the illegal cases or demanding for interfering against it

It is the responsibility of the employee to track the carrying out the work flow properly and smoothly and not leading any setback in the work flow.

Within the frames of the duty of loyalty and care, the employees shall interfere it when there is a setback or distortion in the work flow in a way not risking himself/herself and inform his/her manager. When it is not possible for the employees to interfere or risky, he/she shall immediately demand his/her manager to interfere it.

Interfering or demanding for its being interfered is the outcome of the employees duty of loyalty and care.

If the employee do not perform his duty, it may be a matter of the termination of the contract without compensation when it is against the duty of loyalty whereas it may be a matter of termination of the contract when it is against the duty of care depending on the severity of the event. For sure, the employer can apply milder sanctions depending on the nature of the event.

6.33 Occupational Health and Safety


Employees are responsible for observing the occupational safety rules defined with the instructions in addition to knowing and fulfilling his/her liabilities with the awareness that he/she is responsible for ensuring both the occupational safety and the workplace safety. Employees are informed on occupational health and safety and vocational risks encounters, measures required to be taken and the legal rights and liabilities.

6.34 Responsibility towards the Nature and the Environment

MIP has adopted the principle of not damaging the environment in its activities. For this purpose, MIP employees are responsible for supporting all actions planned with the aim of protecting the environment and efficient use of the natural resources, and acting in conformity with the laws, regulations and instructions on the subject.

6.35 Representation of the Company

MIP/MMI and MMP employees shall act in line with the principles and rules of the corporate culture with the awareness of being a member of the MIP family, and shall display exemplary behaviour and conduct in both the internal and external relations as a member of the family that he/she represents. The weakness of the company

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	14 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

and information detrimental to the reputation of company shall not be disclosed. Protection and improvement of the reputation and interests of the company are the main tasks of all MIP employees.

6.36 Exercise of Authority


In the event of determination or complaints related with violation of the principles and rules stipulated in this procedure, the rules set forth in the discipline code shall be applicable. After verification of said determination or complaint, the subject shall be notified to the General Manager.

7. DISTRIBUTION AND FILING

Preparer department is responsible for the publication, distribution and archiving of the procedure/related documents. Otherwise, please specify the relevant department here.

8. REVISION HISTORY

Date	Rev.No	Revision Definition	QMS Check
01.11.2014	0	First Edition	
27.12.2017	1	Changes were made to the acceptance of the targets, the amount was determined.	
18.12.2019	2	Document Code was changed ARTICLE 6.5 – Control of Personnel Affairs article is removed. ARTICLE 6.5 – Preventing Bribery and Corruption ARTICLE 6.6 – Gifts and Hospitality ARTICLE 6.7 – Relations with Public Institutions and Establishments ARTICLE 6.8 – Political Donations ARTICLE 6.9 – Charitable Donations/Sponsorsip ARTICLE 6.10 – Relations with the Media and Csos ARTICLE 6.11 – Anti Money Laundering, Counter Terrorist Financing and Sanctions ARTICLE 6.15 – Title has been changed ARTICLE 6.22 – Conformity and Work Performance of the Employee article has been removed.	
12.09.2022	3	ARTICLE 6.1 – Applicability ARTICLE 6.2 – Committing to the Code	

	HUMAN RESOURCES MANAGEMENT	Document Code:	YS.P106
		Page:	15 of 15
	THE CODE OF ETHICS	Revision Date:	12.09.2022
		Revision No:	3

	<p>ARTICLE 6.3 – Our Core Values and Ethical Foundation</p> <p>ARTICLE 6.4 – Business Principles</p> <p>ARTICLE 6.5 – Ethical Decision-Making</p> <p>ARTICLE 6.6 – Our Responsibility to one Another</p> <p>ARTICLE 6.7 – Integrity of Accounts</p> <p>ARTICLE 6.8 – Whistleblowing</p> <p>ARTICLE 6.11 – Alcohol and Drugs</p> <p>ARTICLE 6.19 – Teamwork</p> <p>ARTICLE 6.20 – Social Media</p> <p>ARTICLE 6.24 – Conflict of Interest</p> <p>ARTICLE 6.25 – Title and content have been changed</p> <p>ARTICLE 6.26 – Content has been changed</p>	
--	---	--

ANNEXES

- 1) DECLARATION OF TRADE / BUSINESS FORM
- 2) CONFIDENTIALITY COMMITMENT AND CONSENT OF PERSONAL DATA FORM
- 3) STATEMENT ON PROCESSING EMPLOYEE PERSONEL DATA FORM

To be completed by Senior Management

I consider the recommendation appropriate. I decline the recommendation and consider it inappropriate. Employee may be allowed to take part in a business activity/business relationship. Employees should not be allowed to take part in a business activity/business relationship.

Signature : _____

Name & Signature : _____

Date : _____

Signature : _____

Name & Signature : _____

Date : _____

Confidentiality Commitment and Consent of Personal Data

I, the undersigned, employee of Mersin International Port (“MIP”), Mersin Denizcilik Faaliyetleri A.Ş. (“MMI”) and Mersin Pilotaj ve Denizcilik Faaliyatleri A.Ş. (“MMP”) hereby agree and undertake that I will not disclose the confidential information and documents related to the activities and during the implementation and execution of the activities of MIP, MMI and MMP, working methods, projects, programs, documents and information I have obtained and those will I would learn in the future with respect to the businesses and organizations, third parties in which the Company is engaged or involved in business and contractual relationship for implementation of the Company’s activities in any manner or way, neither verbally nor in writing, by computer, e-mail environment or via other means of communication such as smartphones and other devices and I further agree and acknowledge that I will observe and abide by this confidentiality obligation.

I agree and undertake that in accordance with the Code of Ethics Procedure Article 6.14 (Principles of Confidentiality of Company Information), I am obligated to be aware of and act in compliance with confidentiality principles and know the degrees of confidentiality of the information I have come to know or am acquiring while doing my duty in order to protect and save MIP, MMI and MMP information. Also, it should be noted that, in the event of hesitation in terms of confidentiality, the views of the department manager must be obtained and that any documents, records, pictures, texts and other documents containing such information shall not be altered, copied, disclosed or given to any person other than the employer and such information shall not be destroyed unless permission for so is obtained. Furthermore, I agree and undertake that I will take necessary precautions to ensure that this information is not declared and disclosed in public places, are archived, stored, saved duplicated and backed up duly. I further agree that the information is removed from my desk at the end of office hours and I will lockup documents and information that contain high confidentiality degree (including the laptops which belong to the Company) and that I will not disclose confidential files of the Company to outside of the Company, unless such information are to be disclosed under specific exceptions and by the approval of the senior management.

I agree and undertake that I will store and keep computer codes, usernames and user codes and passwords which are assigned for my personal use and which I am obliged to change after receiving the delivery to safeguard the systems and application software allocated to and/or used by the Company to be used, to protect the secrets, to update the passwords at periodic intervals to provide safe use of the same, I agree that I will not provide and disclose any information to persons other than the authorized users and that I will be personally responsible for the storage and preservation of such information and I will not share the same with any person and will not use it for any reason whatsoever.

During the period of my employment and even after cease of employment, I agree and acknowledge that all websites and e-mails I have accessed on the Internet and all other information systems that I have accessed as well as all records connected to the activities pertinent to MIP, MMI and MMP that I carry out can be examined, reviewed and audited by MIP, MMI and MMP at any time by MIP, MMI and MMP company may choose and that MIP, MMI and MMP have the full discretion and authority to use the electronic communication and information processing tools and media to conduct such inspections and I further declare and undertake that MIP, MMI and MMP have the right to review such information in terms of compliance with the rules and reserve the right to share such information with the authorized institutions within the framework of legal regulations without permission of the employees thereof.

Name & Surname :
Registration :
Date :
Signature :

In line with Article 6.15 of Ethics Principles Procedure (Principle of Privacy of Personal Information), I, the undersigned, hereby agree, acknowledge, declare and undertake that I am obligated to notify and inform the Human Resources Management about any changes that may happen in my personal information such as my address, marital status, contact numbers, etc., which may only be used by authorized personnel for business purposes and that the personal information and personal rights as well as personal information is confidential and needs to be treated as confidential.

I agree and undertake that I will protect, save and keep confidential all information including names, surnames, genders, addresses, telephone numbers, e-mail addresses, location information and shopping information of persons and organizations that I will be informed about and/or I will come to learn or know due to my job, and which may be belonging to the private-public persons and organizations that MIP, MMI and MMP are involved in relation/connection with and any written or verbal, financial or nonfinancial agreement and application information between such persons and MIP, MMI and MMP and all information about MIP, MMI and MMP and I further acknowledge, agree, declare and undertake that I will keep confidential such information relating to persons/organizations with which MIP, MMI and MMP have relationship as well all the information belonging to such parties thereof.

I also agree, declare, accept and undertake that I have thoroughly read and understood the "PROCEDURES" booklet and that I will comply with this policy and abide by and respect the amendments to be made in such rules and that acting in contradiction to the other policies, procedures, instructions and ethical rules and my obligations stated in this undertaking and that MIP, MMI and MMP shall be entitled to all pecuniary and non-pecuniary damages and indemnities (even if such damages are determined in the period after ceasing employment with the company), and that I shall be responsible for all liabilities and that MIP, MMI and MMP may terminate my employment agreement and apply all kinds of legal remedies if necessary as well as disciplinary penalties may be imposed upon me in accordance with the Labor Law 4857 and Disciplinary Regulations of Maritime Labor Code 854.

I further agree, acknowledge and undertake that I am aware of the fact that my employer has the authority to process my general personal data during my employment and after ceasing my employment and I agree and consent that my employer is authorized to process my personal data in connection with the employment relationship as required by employment relationship in terms of my personal data and information (such as but not limited to race, ethnicity, political thought, religious and philosophical beliefs, appearance, associations, foundations and trade union membership, health, criminal record, conviction and security measures, biometric/genetic data etc.) and I also agree and undertake that I will not disclose or share and such personal or general information I would reach or obtain during my employment to and with third parties under any reason whatsoever.

By this letter, I agree, accept, declare and undertake that commitment to the protection of personal information has become legally compulsory for the maintenance of the business relationship. Failure to comply with this requirement will make employment unable to continue and failure to provide personal data protection will hamper the provision of employment and if I fail to do so, my employment agreement can be terminated based on valid grounds due to legal inability to abide by the provisions thereof.

Name & Surname :
Registration :
Date :
Signature :

ÇALIŞAN KİŞİSEL VERİLERİNİN İŞLENMESİNE İLİŞKİN AYDINLATMA BEYANI

Bu beyan kişisel verilerinizin işlenmesi konusunda 6698 sayılı Kişisel Verilerin Korunması Kanunu (“**Kanun**”) m. 10 çerçevesinde aydınlatılmanızı sağlamak amacıyla hazırlanmıştır. Kişisel verilerinizin işlenmesi açısından Kanun kapsamında veri sorumlusu, “Mersin Uluslararası Liman İşletmeciliği A.Ş.” (“**MIP**” veya “**Şirket**”).

KİŞİSEL VERİLERİNİZİN İŞLENME AMAÇLARI NELERDİR?

Kişisel verilerinizi aşağıdaki amaçları gerçekleştirmek için işliyoruz:

1. Yasal sınırlar çerçevesinde çalışmanızın tabi olduğu esasları belirlemek amacıyla iş sözleşmesi kapsamında yükümlülüklerinizi yerine getirilebilmeniz için sağlanması;
2. Yasal sınırlar tahtında gerekli olduğu ölçüde aşağıdaki konu ve faaliyetlerin planlanması, organize edilmesi, yönetilmesi ve/veya icrası için:
 - iş sözleşmesinin ifası,
 - iş faaliyeti takibi ve denetimi,
 - iş sağlığı ve güvenliği gibi yasal yükümlülükler,
 - (T.C. vatandaşı olmayanlar için) gerekli olduğu takdirde çalışma ve oturma izni ve benzeri diğer istihdama yönelik resmi süreçlerle ilgili işlemler,
 - ücretin ödenmesi, yan haklar (servis hizmeti, şirket aracı dahil) ve menfaatler, iş kıyafeti temin edilmesi,
 - ücret yönetimi, performans değerlendirme, atama-terfi ve işten ayrılma süreçleri,
 - çalışan memnuniyeti ve bağlılığı süreçleri ile benzeri tüm diğer insan kaynakları süreçleri,
 - şirket içi veya dışı eğitim faaliyetleri (deniz hizmetleri dahil) ve oryantasyon aktiviteleri ile yetenek -

STATEMENT ON PROCESSING EMPLOYEE PERSONAL DATA

This statement has been prepared to inform you about the processing of personal data in accordance with article 10 of the Law No. 6698 on Protection of Personal Data (“**Law**”). For the purpose of processing your personal data, the data controller, as defined under the Law, is “Mersin Uluslararası Liman İşletmeciliği A.Ş.” (“**MIP**” and “**Company**”).

WHY DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data to realize the following purposes:

1. To enable you to fulfill your duties as described under your employment contract to establish the framework of your work within the legal boundaries;
2. To the extent necessary within the legal boundaries to plan, manage, perform and/or organize the following matters and activities:
 - performance of labour contract,
 - following-up and supervising employment related activities,
 - legal obligations such as work health and safety,
 - (for non-Turkish citizens) all actions necessary to fulfill and finalize regulatory requirements before governmental authorities such as work permits and residence permits,
 - payment of wages, side rights (including company service and car) and benefits, providing work uniform,
 - compensation policies, performance evaluations, promotions and termination of employment processes,
 - processes for creating and maintaining employee satisfaction and loyalty and all other related human resources processes,
 - internal or external training programs including marine services, orientation activities, talent and

- | | |
|--|--|
| <p>kariyer gelişimi faaliyetleri,</p> <ul style="list-style-type: none">• kamu kurum ve kuruluşlarından gelen taleplerin karşılanması,• sivil toplum kuruluşuna ve meslek odalarına üye olunması,• periyodik sağlık kontrolleri (gemi adamı dahil), poliklinik hizmeti, kaza raporlarının tutulması, kaza sonrası sağlık hizmetleri,• kullanıcı hesabı oluşturmak ve şirket cihazlarına program ve yazılım yüklenmesi,• giriş-çıkış kartlarının ve kayıtlarının (CCTV dahil) oluşturulması ve tutulması,• gerekmesi halinde işyeri uyuşturucu testi• çalışanlara yönelik kurumsal iletişim ve çalışanların katılım sağladığı kurumsal sosyal sorumluluk faaliyetleri,• çalışanların iş ve üretim süreçlerinin iyileştirilmesine yönelik önerilerinin alınması ve değerlendirilmesi,• Açık rıza uyarınca özel sağlık sigortası poliçesi düzenletirilmesi. | <p>career development activities,</p> <ul style="list-style-type: none">• responding to the queries raised by official authorities,• being a member of civil society organizations and trade associations,• periodic health checks (including seamen), ambulatory care services, issue of incident reports, health care service after an incident,• creating a user account, loading program and software to company devices,• issuing entrance cards and keeping their records (including CCTV),• in case of necessity, workplace drug testing,• corporate communication activities, and social responsibility activities involving employees,• processing and evaluating employee recommendations for the improvement of work and production processes,• having private health insurance policy issued pursuant to explicit consent. |
| <p>3. İfa etmekle yükümlü olduğumuz yükümlülükleri yerine getirebilmemiz ve ilgili mevzuat gereği toplamakla yükümlü olduğumuz sağlık verilerinin toplanması;</p> | <p>3. To fulfill our obligations towards you and as a part of this; to the extent we are required to obtain data under the relevant legislation;</p> |
| <p>4. Yukarıda sayılanlara ek olarak Türkiye Cumhuriyeti'nde geçerli İş Kanunu, sosyal güvenlik mevzuatı ve sair diğer mevzuat kapsamındaki yükümlülükler ile iş sağlığı ve güvenliğini sağlamak için uymakla yükümlü olduğumuz yükümlülüklerinin yerine getirilmesi ve yetkili kurum ve kuruluşlara mevzuat gereği sunulması gereken bilgilerin sunulması;</p> | <p>4. In addition to those listed above, to comply with the requirements of the Employment Law, social security legislation, and other applicable legislation in the Republic of Turkey, health and safety related obligations, and to disclose/file information to/with relevant governmental authorities as required under any applicable legislation;</p> |
| <p>5. Şirket, tesis, bina, demirbaş güvenliğinin sağlanması ve</p> | <p>5. To ensure and maintain the safety of the company, premises, buildings and fixtures and</p> |
| <p>6. Şirketin denetim faaliyetlerinin planlanması ve icrası ile insan kaynakları operasyonlarının sürdürülmesi amacıyla çalışan kayıtlarını oluşturulması,</p> | <p>6. To create employees records in order to plan and implement our surveillance activities and conduct human resources operations,</p> |
| <p>7. İş faaliyetlerinin yasal sınırlar içerisinde</p> | <p>7. To monitor and/or control the business</p> |

takip edilmesi ve/veya denetimini sağlanması,

8. İş ortakları, müşteriler ve/veya tedarikçilerle olan ilişkilerin yönetimi, şirketin finansal risk süreçlerinin planlanması ve icrası ile stratejik planlama faaliyetleri (hepsi birlikte “Amaçlar”).

ÇALIŞAN KİŞİSEL VERİLERİNİ HANGİ YÖNTEM VE HUKUKİ SEBEBE DAYANARAK TOPLAYIP, SAKLARIZ?

Yukarıda belirtilen Amaçlar’ı gerçekleştirmek için ihtiyaç duyduğumuz kişisel verilerinizi sözlü, yazılı, fiziki olarak ve/veya elektronik ortamda toplayıp, saklayabiliyoruz. Kişisel verilerinizi elektronik ve/veya fiziki ortamlarda dijital olarak ya da kağıt üzerinde, çalışanımız, yöneticilerimiz, ilgili teknik destek ekibimiz ve arşiv görevlilerimizce ulaşabilecek şekilde saklıyoruz.

Kişisel verilerinizi, Kanun’un m. 5/2’nin (a) (kanunlarda açıkça öngörülmesi), (c) (bir sözleşmenin kurulması veya ifası), (ç) (hukuki yükümlülüklerin yerine getirilmesi), (e) (bir hakkın tesisi, kullanılması ve korunması) ve (f) (meşru menfaat) bentleri uyarınca toplamaktayız.

KİŞİSEL VERİLERİNİZİ BAŞKALARI İLE PAYLAŞIYOR MUYUZ?

MIP, bu beyan kapsamındaki kişisel verilerinizi yukarıda belirtilen Amaçları gerçekleştirmek üzere ve ancak gerekli olduğu ölçü ve oranda, destek veya hizmet aldığı üçüncü kişi tedarikçilerle, şirket ortaklarıyla veya yetkili kamu kurum ve kuruluşlarla paylaşabilir; yurt içinde veya yurt dışında işleyebiliriz.

KİŞİSEL VERİLERİNİZİN KORUNMASI İÇİN SAHİP OLDUĞUNUZ HAKLAR NELERDİR?

Kanun uyarınca kullanabileceğiniz haklarınız:

- Kişisel verilerinizin işlenip işlenmediğini öğrenme,
- Kişisel verileriniz işlenmişse, nasıl işlendiğine ilişkin bilgi talep etme,
- Kişisel verilerinizin işlenme amacını ve Kişisel verilerinizin işlenme amacına uygun kullanılıp kullanılmadığını öğrenme,
- Yurt içinde veya yurt dışında kişisel verilerinizin aktarıldığı üçüncü kişileri bilme,
- Kişisel verilerinizin eksik veya yanlış işlenmiş olması halinde bunların

activities of our employees within legal limits,

8. To manage relationships with business partners, customers and/or suppliers, to plan financial risk management processes and to carry out strategic planning activities (all of the above together the “Purposes”).

HOW AND ON WHICH GROUND DO WE COLLECT AND STORE YOUR PERSONAL DATA?

We collect your personal data in line with the Purposes explained above when you share them with us in writing, verbally, physical and/or electronic environments. We store such personal data in electronic and/or physical platforms digitally or on paper in manners that can only be accessed by our employees, executives, IT support team and archive personnel.

We collect your personal data as per Article 5/2-(a) (requirement by the law), (c) (entering into or performance of agreement), (ç) (compliance with a legal obligation), (e) (to establishing, performing and protecting a right) and (f) (legal interests) of the Law.

DO WE SHARE YOUR PERSONAL DATA WITH OTHERS?

MIP may share your personal data collected in line and within the scope of this statement to realize the above mentioned Purposes to the extent required and proportionate; with third party service provider, Company’s shareholders or authorized state organizations and institutions, and process them locally or abroad.

WHAT ARE YOUR RIGHTS ABOUT YOUR PERSONAL DATA?

The Law entitles you to do the following:

- Obtaining information as to whether your personal data is processed or not;
- Obtaining information on how your personal data is processed;
- Obtaining information on the purpose of processing your personal data and as to whether it was used in accordance with the purpose;
- Obtaining information on local and foreign third parties who were transferred your personal data;
- Demanding correction if your personal data were processed inaccurately or

- düzeltilmesini talep etme,
- İlgili mevzuatta öngörülen şartlar çerçevesinde kişisel verilerinizin silinmesini veya yok edilmesini isteme,
- İlgili mevzuat uyarınca yapılan düzeltme, silme ve yok edilme işlemlerinin, kişisel verilerinizin paylaşıldığı üçüncü kişilere bildirilmesini isteme,
- İşlenen kişisel verilerinizin münhasıran otomatik sistemler vasıtasıyla analiz edilmesi suretiyle sizin aleyhinize bir sonucun ortaya çıkmasına itiraz etme,
- Kişisel verilerinizin kanuna aykırı olarak işlenmesi sebebiyle zarara uğramanız halinde, zararın giderilmesini talep etme.
- Demanding deletion or destruction of your personal data in accordance with the conditions stipulated in the applicable legislation;
- Demanding notification of deletion, correction and destructions made in accordance with the applicable legislation to third persons;
- Filing objection against unfavorable results obtained through analysis of your personal data using automatic systems only;
- Claiming compensation for losses and damages that may arise from illegal processing of your personal data.

Yukarıdakilerle ilgili detaylı bilgi için legal@mersinport.com.tr ve hr@mersinport.com.tr isimli e-posta adreslerini kullanarak MIP İnsan Kaynakları Departmanı ve MIP Hukuk Departmanı ile iletişime geçebilirsiniz. Ancak Kanun ve ilgili alt mevzuatın öngördüğü şekil ve içerik şartları gözetilmeksizin iletilen istekler MIP tarafından dikkate alınmayabilir.

MIP'nin kişisel verilerimi yukarıda belirtilen Amaçlar çerçevesinde işlemesi konusunda bilgilendirildim.

You may contact MIP Human Resources Management and MIP Legal Affairs at legal@mersinport.com.tr & hr@mersinport.com.tr for further information. However requests filed without observing the statutory requirements under the Law and its secondary legislation with respect to due process and content may be disregarded.

I have been informed about the processing of my personal data by MIP for the above mentioned Purposes.