

IT ALL  
BEGINS  
WITH A  
*dream*

SUSTAINABILITY REPORT 2019



# Chairman's Message

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Global Investment Holdings (GIH) takes place amongst Turkey's leading holdings companies with its operations in port infrastructure (operation of cruise ports and commercial seaports), energy (renewable and clean energy generation, compressed natural gas distribution and sales; energy efficiency), mining, real estate (development and operation of real estate projects) and finance (non-banking financial services such as brokerage, consultancy and asset management), it also captures the same success in the overseas markets as a Group which has become synonymous with prestige in global brand positioning. The Group, which was established as a brokerage firm in 1990, has been operating as a holding as a multi-faceted group of companies since 2005 and has turned into a dynamic investment instrument with focuses on a variety of nascent business sectors and traditional non-banking financial service providers that offer high growth potential with "first mover" advantages. GIH is an investment holding focused on maximizing its share value with active investment strategies, diversifying its investments in its fields of activity. Global Investment Holdings' general perspective and strategy is based on evaluating investment opportunities in niche sectors and business lines that will provide added value. GIH has determined a strategy that focuses on developing regional and global companies in its main fields of activities (port infrastructure, clean energy and asset management). With this focus GIH uses its resources more efficiently and aims to grow faster in these strategic areas with high growth potential. Despite worldwide political and economic tremors felt in 2019 for all Group companies showed a strong financial performance and strategic sectors continued to focus on sustainable growth and investment opportunities in new markets.

With its robust and diversified portfolio and capable management team, GIH always aims to contribute to the development of Turkey through responsible investment and provide sustainable returns to its shareholders by putting sustainability at the centre of all of its operations. The core of GIH's sustainability approach is to maintain and develop its corporate reputation and the trust of its all stakeholders, which are GIH's most valuable asset. The Group also believes that that financial returns are not enough unless they also generate social benefits and continue to contribute through Global Investment Holdings or its subsidiaries to sustainable development in the regions where it operates.

**Mehmet Kutman**

Chairman

# Our Sustainability Approach

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Since the first day of its establishment, Global Investment Holdings has contributed to the development of Turkish capital markets with its diversified and expanding portfolio and future-oriented investment approach that thrives on excellence.

Within the framework of our business strategy, we swiftly adapt to the continuously changing business environment and market conditions to take advantage of the attractive investment opportunities in growing sectors. We not only evaluate investments made based on their economic success, but also expect them to garner permanent results and create value for all our stakeholders. Accordingly, we evaluate the growth potential of the identified sectors through effective risk and market analysis tools and use the first mover advantage. We manage all our decision-making processes and related work in line with our sustainability approach and corporate governance principles.

We carry out all our port, energy, real estate, financial and other activities in accordance with the environmental legislations and international standards. As stated in our [Environmental Policy](#), we are committed to managing and reducing the environmental impacts of our business activities and continuously improving our environmental performance. We aim to reduce our greenhouse gas emissions to minimize our impact on climate change and we conduct activities to reduce energy use and increase energy efficiency in all stages of our operations. We aim to lower the water consumption and use of natural resources while using them in the most efficient way in all our operations. We treat and discharge water emissions (wastewater) in accordance with legal obligations. We conduct our activities to

assess, reduce and recycle waste resulting from our activities at the source, and dispose of them as required by relevant legislation.

### **We are a signatory to the United Nations Global Compact**

Sustainability plays an important role at this point reached in the industry, along with the contributions we have made to Turkish capital markets. Our fair, responsible and accountable management understanding, ethical principles, environmental sustainability efforts, understanding of human rights in a business environment, occupational health and safety, supplier relations and social contributions considered within the scope of our sustainability work constitute an integral part of our business. In line with this approach, we are a signatory to the United Nations Global Compact and committed to the Ten Principles concerning human rights, labor rights, environment and anti-corruption.

Accordingly, we appointed different business units to establish the Sustainability Committee in 2016 for conducting sustainability studies in a systematic manner, establishing the necessary strategy, objectives and action plan and, integrating these within our corporate structure. Under the leadership of this Committee and with the support of the top management, we identified the material issues that we need to focus primarily in the field of sustainability by conducting a stakeholder analysis complying with the internationally accepted AA1000SE standard. Our material issues defined at the end of stakeholder analysis are occupational health and safety, sustainable financial growth, business ethics, fair-transparent-accountable management approach, and renewable energy.

Since two years, Global Investment Holding has been included in the BIST Sustainability Index it comprises the shares of listed companies on Borsa Istanbul with a high corporate sustainability performance. The Company was included in the index thanks to its continued compliance with the index criteria.

We published our sustainability reports on our website to ensure stakeholder engagement and to contribute to our sustainability efforts in this context. We are committed to publishing our sustainability performance and future plans on our website in the coming period and to improve our work in line with the opinions of our stakeholders.

Sustainability management and "The Duties and Working Principles of the Sustainability Committee" may be reached from [here](#). More information on the stakeholder analysis and our material issues are available at our [Sustainability Report](#).

We welcome your notices, opinions and suggestions about sustainability. You can send any feedback to the notification e-mail line: [surdurulebilirlik@global.com.tr](mailto:surdurulebilirlik@global.com.tr)

# Our Environmental Impact

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Global climate change, rapid population increase, and shortage of natural resources are causing pressure on global markets. The private sector players shoulder the main responsibility in solving the global issues that have increasingly made their presence felt, especially since the industrial revolution. At Global Investment Holdings with the consideration of our global investment portfolio we conduct our business with awareness of the potential impact of our performance on the environment. Accordingly, as we see as an important duty to continue to grow, we see it as an important duty to control our impact on the environment and contribute to the solution of global issues.

Within this scope, we track the Holding's operations, as well as effectively manage the environmental performances of the Holding's subsidiaries. The framework of our work about energy management, renewable energy investments, water and waste management and biodiversity is set by our Environment Policy. We determine the outline for the updating of the [Environmental Policy](#), management of environmental issues and the studies conducted within the scope of the Sustainability Committee in line with the [Principles and Procedures of the Environmental Management System](#).

In addition to the policies and principles with which all our subsidiaries are required to conform, we expand the use of management system practices at international standards for the purposes of ensuring effective tracking and management of our environmental performance. Our energy companies and ports in Kuşadası, Akdeniz, Bodrum, Malaga ve Adria all have the ISO 14001 Environmental Management System Certificates. At the Holding, we have been awarded [ISO 14001: 2015 Environmental Management System & ISO 9001:2015 Quality Management System & certification](#) since 2018. We manage all our activities in line with these international standards.

## Certifications of the Ports

Ports	ISO Standards						Other Standards			
	9001	10002	27001	28001	14001	45001	50001	Eco-Ports*	Green-Ports	QSCs for Spanish Ports
Kuşadası	📌		2020	📌	📌	📌		📌	📌	
Akdeniz	📌	📌	2020		📌	📌	📌	📌	📌	
Bodrum	📌		2020	📌	📌	📌		📌	📌	
Barcelona	2020				2020			📌		📌
Malaga	📌				📌					📌
Adria	📌				📌	📌				
Lisbon	2020				2020					
Valetta	2020				2020					
Catania	2020				2020					
Cagliari	2020				2020					
Ravenna										
Zadar										
Antigua										
Nassau										

\*: Within the EU only Port authorities can become EcoPorts certified.

Kuşadası, Bodrum and Akdeniz port operations are all conducted under the Green Port certificate. We aim to apply for a Green Port certificate for Lisbon Port within the next period. Moreover, Kuşadası, Akdeniz, Bodrum ve Barcelona Ports are included within the scope of Green Port Practices by ESPO (European Sea Ports Organization) EcoPorts. The targeted certifications and Port names for the year 2020 are shown in the table above. Additional information on the Certifications of the Ports are available at our [Global Ports Holding PLC Annual Report 2019](#).

We handle our work in the field of the environment under the leadership of the Sustainability Committee, with the participation of varied stakeholder groups and within the scope of the cooperative initiatives we have established. We are aware of the importance of the feedback we receive from our stakeholders and shape our work in line with their contributions. Within this scope, the results obtained from the stakeholder analysis, conducted at international standards, support the development of our work regarding the environment.



Our renewable energy investments and studies on climate change and the protection of the water ecosystem are conducted in parallel with the Sustainable Development Goals of the United Nations. Our work contributes to SDG 6, SDG 7, SDG 13, SDG 14 and SDG 17 specifically.

We seek to further our performance regarding the environment with each passing year. Our environmental investments have increased three folds comparing to last year and reached TRY 2.478.553 in 2019. There have been no environment related non-compliance or environmental fines due to our operations within the last four years.



### **CLIMATE CHANGE AND ENERGY MANAGEMENT**

The global climate change that originates from greenhouse gas emissions and whose effect we have been increasingly feeling, brings along risks that are closely related to the operations of many sectors. Effective energy management plays an important role in management and conversion of these risks into an advantage.

As we seek to achieve our corporate objectives, we consider reduction of our greenhouse gas emissions, more effective use of energy, and responsible consumption among our priorities to be pursued across the Holding. We regularly follow the energy consumption of both the Holding and all its subsidiaries. As such, we test our corporate performance regarding the set targets and seek to develop any areas where our performance falls short.

Accordingly, in 2019 we achieved a reduction of 149 MWh in energy consumption as a result of a various energy efficiency projects. In the next period, we aim to increase our energy savings by making improvements to the tools and systems we use, implementing rooftop solar panels, changing lighting systems, and the use of electrical vehicles. In 2019, our energy consumption of the energy generation and mining facilities was 35,682 MWh and real estate and Global MD Portfolio Management companies was 9,151 MWh, equating to 44,833 MWh in total.

## GROWING RENEWABLE ENERGY PORTFOLIO



### **29.2 MW Total Biomass Based Installed Capacity**

In addition to two biomass plants that we commissioned in 2017, we had commissioned a third plant with an installed capacity of 12 MW in Derik, Mardin in October 2018. Thus, our power to generate electricity from biomass reached a total of 29.2 MW. This meets the electricity requirement of over 80 thousand households. In 2019, Mavibayrak, Mavibayrak Doğu ve Doğal Energy facilities generated 122,207 MWh electricity from 230,973 tons of residues and waste from agricultural fields, forests, and livestock.

### **Solar Energy**

The investments in 10,8 MWp solar power plant that began to be installed in Mardin by our group company Ra Güneş in 2018 is finalized in 2019, and the plant began to generate power in 2020.

In order to accelerate our operations in the field of solar energy, we had signed an engagement letter with Canadian Solar, which is listed in NASDAQ and named among the top five solar panel manufacturers and operators of the world, for the development and operation of solar energy projects featuring a total capacity up to 300 MW.

Global Investment Holdings' 51% subsidiary in solar energy, Barsolar D.O.O. Bar in Montenegro was granted Temporary Status of Privileged Energy Producer. The solar plant is located in the port of Adria, Bar, Montenegro. Barsolar is expected to generate about 6.9 million kWh electricity per year, meeting the electricity requirement of more than 2.6 thousand households.



## GHG Emissions

We also keep track of our greenhouse gas emission values. The calculations on GHG emissions data of the Ports, which cover the Scope 1 and 2 GHG emissions, have been conducted in accordance with the GHG Protocol control approach. During 2019, GPH's Scope 1 and Scope 2 Greenhouse Gas Emissions reduced by 9.0% compared to previous year. Additional information on GHG emission calculations of the Ports are available at our [Global Ports Holding PLC Annual Report 2019](#).

**Table of the GHG Emissions of GPH (tonnes CO<sub>2e</sub>)\***

	2018	2019
Scope 1	2,748	2,514
Scope 2 (Location based)	5,907	5,363
Scope 1 and 2 total Location-based	8,655	7,877
<b>Carbon intensity</b>		
Per full-time equivalent employee	14.77	12.32
Per sqm facility area	0.0096	0.0085

\*:Emissions were calculated in accordance with the GHG Protocol control approach using IPCC 2006 emission factors, AR5 GWP values, the International Energy Agency and the World Resources Institute emission factors and local fuel data (net calorific value and density), where possible.

## WATER AND WASTE MANAGEMENT

We monitor our water consumption in the fields where we are active and consider any waste that is the direct or indirect result of our operations as our responsibility within the scope of our environmental management strategy. In line with the responsibility we have undertaken, we track our water consumption on a regular basis. In 2019, our water consumption of the real estate and Global MD Portfolio Management companies was 40.084 m<sup>3</sup> and annual water consumption per employee was 308 m<sup>3</sup>. The total water consumption of the GIH including Mavibayrak ve Doğal Energy companies and Kuşadası, Bodrum, Barcelona, Cagliari, Catania, Lizbon, Malaga, Valetta MaltaPorts and the real estate and Global MD Portfolio Management companies, amounted to 182.331 m<sup>3</sup>.

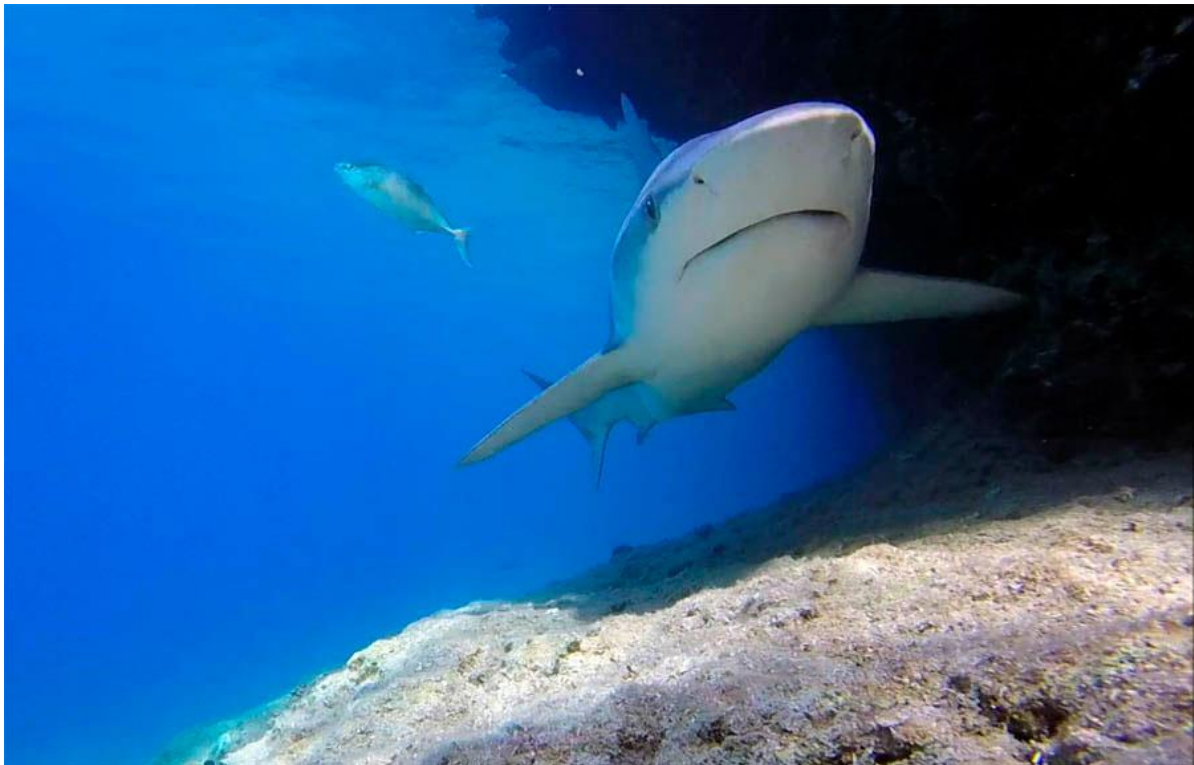
Within the scope of our waste management efforts, we plan to monitor our waste generation more effectively. At the same time, we aim to increase the rate of recycling in general at the Holding and its subsidiaries. We aim to generate waste of a more recyclable nature through awareness studies conducted in the company and by expanding the scope of recycling practices. In 2019, the total waste amount generated as a result of our operations was 18,023 tonnes. 93% of waste is non-hazardous, while 7% is hazardous. Additional information about waste is provided in the GIH Environmental Performance Indicators table below.

Our port operations are important in terms of waste management. We ensure that the waste generated at the ports is separated before storage. We store all the waste

obtained from ships at our ports and render such waste more environmentally friendly by subjecting it to treatment. On the other hand, we treat waste water and regularly control its contents to ensure compatibility.

In 2019, the total wastewater discharge of the GIH including energy generation, natural gas, mining sector companies and Adria, Kuşadası, Bodrum, Akdeniz Ports and the real estate and Global MD Portfolio Management companies, amounted to 91.906 m<sup>3</sup>. In the future period, we will continue to control the waste water generated as a result of our operations within the scope of corporate and legislative requirements. In this regard, we aim to improve the quality and decrease the amount of the waste water generated in the future periods.

## **OUR SUPPORT FOR THE PROTECTION OF BIODIVERSITY**



Protection of land and marine ecosystems is extremely important where the health of our planet and sustainability of our business models are concerned. All industrial activities have some sort of effect on the environment. We diligently work towards minimizing these effects and towards not causing any direct or indirect irrecoverable damage to the environment or damaging biodiversity as a result of our operations.

At Global Investment Holdings, we are aware of the effect that our facilities spread across the world may have on biodiversity, led by our port operations that are included within the scope of our wide-ranging activities as required by our expansive investment portfolio. For this reason, we assess the impact of all our operations on biodiversity and have continued to work on this issue since 2015. In addition to minimizing the effect of our operations, we collaborate with others and lead work for the protection of natural life in for contributing positively to biodiversity.



One of our facilities is located in the Gulf of Gökova. We are carrying out a collaborative project, which began in 2015 and still continue in 2019, with the Association for the Protection of Mediterranean called the Sandbar Shark (Carcharhinus Plumbeus) and Breeding Site Project at Boncuk Bay, which is near the Gulf of Gökova and has Special Conservation Area status. Under this project, we contribute to the protection of sandbar sharks and their

living environment which are included in the sensitive category in the International Union for Conservation of Nature's (IUCN) Red List and in the endangered category in the red list for the Mediterranean region. Accordingly, we include and benefit from the knowledge of the local fisherman in the studies we conduct.

## GIH ENVIRONMENTAL PERFORMANCE INDICATORS

	2017	2018	2019
<b>Energy Consumption (MWh)</b>	54,613.1	80,113.4	44,833 <sup>1</sup>
<b>Water Data (m<sup>3</sup>)</b>			
Water Consumption (m <sup>3</sup> )	204,000	473,679	182,311 <sup>2</sup>
Wastewater (m <sup>3</sup> )	23,000	48,894	91,906 <sup>3</sup>
<b>Waste Data (tonnes)</b>			
Total hazardous waste (tonnes)		2,025	1,312 <sup>4</sup>
Total non-hazardous waste (tonnes)		9,682	16,711 <sup>5</sup>
Total (tonnes)	772,000	11,707	18,023

1: Energy consumption 2019: Energy generation, mining and real estate sector companies and GMD Portfolio Management Company data is included.

2 :Water consumption 2019: Mavibayrak ve Doğal Energy companies and Kuşadası, Bodrum, Barcelona, Cagliari, Catania, Lizbon, Malaga, Valetta Malta Ports and real estate and GMD Portfolio Management Company data is included.

3 : Wastewater 2019: Energy generation, natural gas, mining sector companies and Adria, Kuşadası, Bodrum, Akdeniz Ports and the real estate and Global MD Portfolio Management Company data is included.

4: Hazardous waste 2019: Energy generation, natural gas, mining companies and Ports and the real estate and Global MD Portfolio Management Company data is included.

5: Non-hazardous waste 2019: Energy generation, natural gas, mining companies and Ports and the real estate and Global MD Portfolio Management Company data is included.

**More information on our sustainability practices are available at our [Sustainability Report](#).**

## Our Work Life

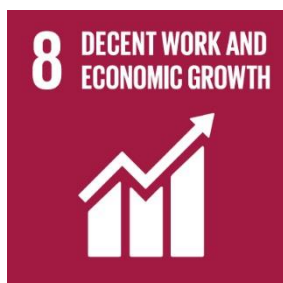
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The importance we attach to our employees plays a significant role in the success of our company and subsidiaries. We are of the belief that we can further this success by improving the commitment, motivation and satisfaction of our employees and strengthening the synergy in the company.

We attach importance to employee development that will allow employees to achieve their potential and offer opportunities to improve both the company and employee performance within this scope. We design our performance management system accordingly to ensure fair judgment of employee competencies and performances.

As a global group, we operate in different geographical areas and we expect our subsidiaries to manage their human resources in consideration of the requirements of these regions. We manage human resources within the scope of our Personnel Regulation that identifies employee rights and the rules with which employees are required to comply.

We prioritize respect to human rights and diversity and inclusion in our approach to our employees. Based on the importance we place on equality in line with the United Nations Global Compact, to which we are a signatory, we refrain from any discrimination on the basis of race, religion, language, gender, etc. in hiring people or providing them with career opportunities. We work towards providing decent jobs and contributing to sustainable economic growth within the scope of Sustainable Development Goals.



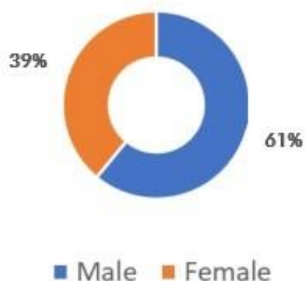
We pay attention to the impact of our operations on local communities and human rights in our activities conducted outside the OECD. We prevent any negative impact in terms of human rights and conduct all our operations in compliance with the Universal Declaration of Human Rights and Conventions of the International Labour Organization (ILO).

We employ a total of 1,510 persons at Global Investment Holdings and affiliates. Seventeen percent of our staff are women. GIH has 198 employees at headquarters; of whom, 39% are women. At GIH and affiliates, women make up 34% of senior management. At the Holding, women make up 23% of senior management. We aim to boost the percentage of women at all levels of the organization, including our board, in accordance with our Sustainable Development Goals. In 2018, GIH's Board of Directors adopted a policy that set a target of 25% women board members within five years. The Board resolved to review progress on this subject and report it annually. This policy continues to be implemented. As of end-2019, GIH's Board of Directors is composed of seven members including one woman.

In February 2019, the Global Ports Holding's, our ports subsidiary, Board approved a proposal from European Bank for Reconstruction and Development (EBRD) for a two-year pilot program aimed at empowering women entrepreneurs in Turkey within the travel and tourism sector. The Program will be focused on the Antalya,

Bodrum and Kuşadası regions and has the potential to be replicated in other countries where EBRD and the Group operate.

2019 GIH Employees Gender Distribution\*



\* Subsidiaries are excluded.

## TRAINING

We believe that our employees can reach their potential through training programs that support both their professional and personal development. We support our employees' professional and personal development through the training programs we provide in personal development, occupational and technical areas.

The training programs provided differ from each other depending on the sector and competency requirements. In our real estate

and finance companies, the training programs mainly focus on capital markets, CMB license renewal, technical issues regarding the exchange and financial markets, and foreign languages. On the other hand, gas measurements, ERP, software, technical maintenance, environmental protection covering marine and land pollution, waste management, quality management and basic occupational health and safety subjects occupy the agenda of the training programs in electricity generation/gas/mining companies.

## HEALTHY AND SAFE WORK ENVIRONMENT

Providing our employees with healthy and safe work environments is among our material issues. To be able to provide this, we manage occupational health and safety in the most effective manner, take the necessary measures in the work environment, and train our employees in this area.

Occupational health and safety risks differ according to the sector and accordingly mining and energy companies are classified among higher risk firms, while ports are classified as moderate, and finance companies as lowest risk ventures. Occupational health and safety is managed according to each sector's requirements and risk levels.

We manage OHS on a company basis by observing sector-based differences and through boards and committees in which employees are also represented. The highest responsible body regarding OHS is the Sustainability Committee that reports OHS issues to the Board of Directors.

We systematically track the risks and performance and work with continuous improvement and zero accident objectives. We pay particular attention to the updating of OHS policy and guidelines. Within this scope we prepared and published an OHS Handbook for ports. Moreover, we work towards improving accident reporting systems.

## PORTS

Port Akdeniz, Egeports, Bodrum Cruise Port, Malaga and Port of Adria have the OHSAS 18001 Occupational Health and Safety Management Certificate and



currently undergoing a renewal process with the new version, ISO 45001:2016. On the other hand, our ports are compliant with the international port operations safety standards, as well as being managed in conformity with ISO 20858 Maritime Port Facility Security Assessment System. More information on our OHS related sustainability practices at the Ports are available at our [Global Ports Holding PLC Annual Report 2019](#).

Our HSE Manual defines all health, safety and environmental guidance across the Company. It is regularly reviewed and updated to reflect global best practice and in-house knowledge-sharing across the business. Across all our ports, the goal is to prevent injury, harm and illness, and to ensure the personal safety of employees, contractors, the public and our community. Our HSE Manual ensures that we not only comply with legislation but embed activities and training into our culture to prevent incidents occurring or reoccurring. If an incident or a 'near-miss' does take place, we have defined reporting procedures and where applicable, use the learning we gain to design preventative action.

### Accident Reduction at the PORTS

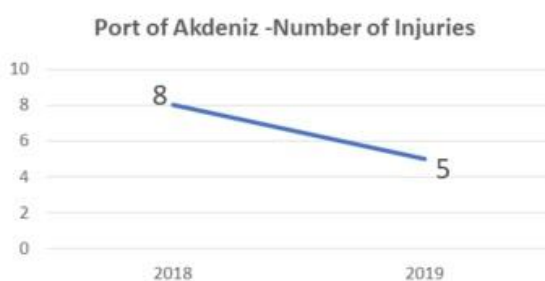
Like any business, our day-to-day operations carry potential risks that must be mitigated. In our case, we welcome many thousands of passengers who travel through our facilities; we work next to, and on, water; and we accommodate some of the world's largest cruise ships.

In the course of transiting more than 9.4 million people through our cruise ports in 2019, there were no reportable incidents that affected passenger safety. Nor were there any injuries to employees during cruise port operations that required any prolonged absence from work.

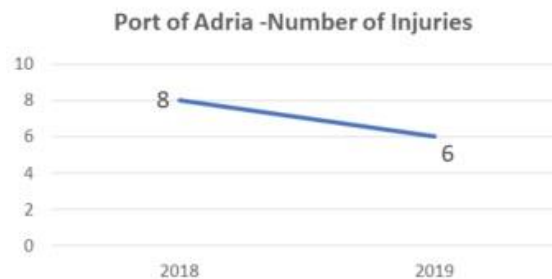
Additionally, we lift and move thousands of tonnes of cargo every week at our two commercial ports. To do this safely, we set rigid processes and make significant investments in highly trained teams, and our equipment and infrastructure.

At our Port of Adria Commercial Port, we reduced injuries at work by 25% to six in 2019, and this followed a 27% decrease in 2018. At Port Akdeniz, injuries were reduced by 37.5% to five in 2019. The overall factor in this continued reduction is our safety culture awareness.

25 % reduction y-o-y



37.5 % reduction y-o-y



## OHS DATA OF GPH

	2019
Number of fatalities	0
Number of OHS training hours	3,901

## ENERGY GROUP OHSAS 18001 CERTIFICATIONS

Consus Enegy, Dogal Energy, Mavi Bayrak Energy, Mavibayrak Dogu Energy, Straton Mining and Tres Energy have OHSAS 18001 Occupational Health and Safety Management Certificates and currently updating their certifications with new the version ISO 45001:2016.

## OHS DATA OF THE GLOBAL INVESTMENTS HOLDINGS (GIH) GROUP COMPANIES

In 2019, we provided a total of OHS training of 14,401 employee x hour to our employees in the Holding and affiliates. Also, energy generation companies, Natural Gas Company and Ports facilities provided a total OHS training of 9,877 employee x hour to our contractors.

	2016	2017	2018	2019
Fatalities	0	0	1	2
Number of Accidents	53	46	63	115
Total OHS Training Hours	6,836	11,390	11,211	14,401

More information on our sustainability practices are available at our [Sustainability Report](#).

More information on our sustainability practices at the Ports are available at our [Global Ports Holding PLC Annual Report 2019](#).

# Anti-Bribery and Corruption Policy

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## BUSINESS ETHICS

We believe that a strong corporate governance is only possible through a strong ethical foundation. Our Company upholds all anti-bribery and corruption laws and regulations in the countries where we operate and are represented. We observe ethical and professional principles, and universal rules of law, in particular, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, transparently and with integrity in all our relationships and business dealings. As a result of the importance we attribute to this issue, we drew up our [Anti-Bribery and Corruption Policy](#) and publicly declared it on the Holding's website.

As Global Investment Holdings (GIH), our Anti-Bribery and Corruption Policy includes the principles, practices, supervision and reporting methods regarding compliance with the laws and regulations on bribery, corruption and facilitation payments, political donations, hospitality costs and gifts. In addition, our Group Company, serving in the port operating business line, GPH's, [Anti-Bribery and Corruption Policy](#) and [Modern Slavery Statement](#) are accessible on its corporate website. Additional information on GPH's business ethics approach and practices is available in [Global Ports Holding PLC Annual Report 2019](#).

We expect all our stakeholders, and especially our employees to embrace this approach and to act within the framework of our [Code of Ethics](#) and [Anti-Bribery and Corruption Policy](#).

The Board of Directors is responsible for approving the Policy, along with supervising the determining and operating notifications, examinations, and enforcement mechanisms for noncompliance of rules and regulations. Senior Management is responsible for preparing, developing, executing and updating the Policy.

Our Policy is reviewed every year and when deemed necessary amended and circulated among the company employees. The Audit Committee, consisting of independent members, is responsible from this review. In addition, the Corporate Governance Committee is responsible for reviewing and improving the Company's Anti-Bribery and Corruption Policy at regular intervals; as well as monitoring these practices on a regular basis, including bribery and corruption issues in the general risk assessment processes; and conducting regular risk assessments in this area within annual periods.

In case of the violation of the Anti-Bribery and Corruption Policy, disciplinary penalties that may extend to the termination of the employment contract can be applied. Moreover, our Group companies commit to show zero tolerance to bribery and corruption and avoid making business with organizations known to be involved in such acts.

We offer training to concerned parties on anti-bribery and corruption issues so that these parties may acquire information on the Policy's principles and internalize them. These parties include all Company employees, contractors, suppliers, agencies and joint ventures. Periodically, we conduct training and awareness programs for employees regarding legal requirements under the anti-bribery and anti-corruption program.

In this context, a total of 138 employees, including 10 managers, were given 1 hour of anti-bribery and anti-corruption training at the Global Investment Holdings in 2019. Our group company, GPH, serving in the port operating business line, conducted 2 hours of anti-bribery and anti-corruption training per employee in 2019, and a total of 28 employees, 20 of whom were managers, received the training. At our Natural Gas Company, 43 employees attended this training.

The below e-mail address is available for all notifications regarding the Code of Ethics, Anti-Bribery and Corruption Principles. In 2018 one report has been received on ethical issues and was resolved.

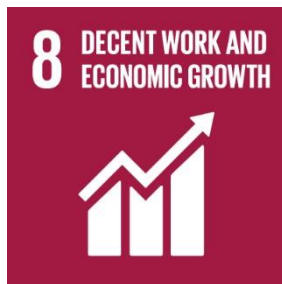
The anti-bribery and anti-corruption reporting e-mail hotline: [etik@global.com.tr](mailto:etik@global.com.tr)

# Community Relations

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In line with our objective to rising while creating difference, we conduct our relations with the employees, contractors, suppliers, customers and the local people in the regions in which we operate with an eye to having a positive effect on all our stakeholders.

## HUMAN RIGHTS



Although Global Investment Holdings and its subsidiaries are not active outside the OECD countries, we take the necessary steps to manage any impact our operations could cause in terms of human rights. We carry out our operations in compliance with the Universal Declaration of Human Rights and International Labor Organization's (ILO) Conventions.

Accordingly, we act with the understanding that any negative influence our operations could have on local residents in the areas where we operate must be prevented and any potential negative effects must be intervened.

In conformity with human rights principles, we are absolutely against child labor and/or forced labor at Global Investment Holdings and also observe the same principles in choosing suppliers and contractors. We encourage compliance with these principles in the contracts we enter into. Sustainable Development Goals 8 "Humane Business and Economic Growth" emphasizes human rights in the work environment for ensuring sustainable development.

The Board of Directors is responsible for the higher-level supervision of the [Human Rights Policy](#) approval and the identification and operating of notification, inspection and sanctioning mechanisms in case of the violation of the rules and regulations. Senior management is responsible for the preparation, development, creation and updating of the Human Rights Policy. The Policy is reviewed by the Corporate Governance Committee at regular intervals and at least once a year and the practices are regularly followed up. Additionally, the Policy is distributed to all staff at the company. We include this Policy in the contracts we execute with our main partners, suppliers and third parties, and contact state officials if human rights are threatened in the regions or countries where we operate. You can write to [etik@global.com.tr](mailto:etik@global.com.tr) about any issues that are in violation of the Human Rights Policy. The Audit Department has not received any notifications regarding human rights.

## CORPORATE CITIZENSHIP

Global Investment Holdings and its subsidiaries are committed to integrating social, environmental, ethical, and human rights concerns into the Group's business operations and core strategy, in close collaboration with stakeholders and the communities where it operates.



The Company values philanthropic engagements that promote Turkey and improve the social, cultural and economic environment, benefiting the country and its citizens, both locally and nationally.

The Company's sponsorship activities in 2019 continued to support sports, educational, charitable, cultural and social causes, and related projects and events.

### **Global Run**

People from all over the world come together to run for cultural tolerance at the Global Run. Global Run is an annual race organized by Global Ports Holding with the hope of bringing the world one step closer to peace and understanding. People from many countries and cultures join the event: a record of over 20,700 participants from 103 countries was registered in 2019. To date, Global Run has been held in Bodrum, Turkey; Valletta, Malta; Bar/Kotor, Montenegro, Ravenna, Italy Havana, Cuba and Barcelona, Spain. The intention is to host a Global Run in all locations of GPH's growing portfolio around the world.

#### Bodrum

A core component of its social responsibility activities, Global Investment Holdings has organized and sponsored Bodrum Global Run annually since 2014. Each year, around 2 thousand runners participate in the popular footrace in historic Bodrum. Proceeds generated from the race and other activities are donated to Turkish charities. Past recipients include Committee Volunteers Foundation (TOG), TOÇEV and Pariltı Association. The sixth edition of Global Run was held on April 28, 2019 with around 1.7 thousand participating in the race.

#### Barcelona

The 2019 Global Run event, the Barcelona Half Marathon, took place on 10th February 2019. Global Ports Holding Plc is the main sponsor of the annual event. It brought together more than 19,000 participants from 103 countries to run in support of cultural tolerance and enjoy the charms of the city.

GPH had additionally supported the hospital ship charity, Mercy Ships, for this year's event by matching every incoming donation made for the 'Run for Hope' initiative. Mercy Ships is a non-profit, international development organisation that deploys hospital ships to some of the poorest countries in the world, delivering free healthcare to people in need. In addition to completing thousands of urgent operations on-board its 'floating hospital', Mercy Ships volunteers also work closely with host nations to improve the way healthcare is delivered.

### **Turkish Foundation for Children in Need of Protection (Koruncuk)**

In 2019, Global Investment Holdings donated money and sent cards from Koruncuk Foundation as New Year's gifts. Turkish Foundation for Children in Need of Protection, founded by volunteers who aimed to establish and promote villages for children in 1979, aims to enable children in need of protection ("Koruncuk" in Turkish) to live in a family environment as soon as they arrive in "the children's village" and grow up in a healthy environment, to receive education, to develop their personal skills, to prepare for the future and contribute to the society at large.

### **Children and Youth events organized by Valletta Cruise Port Social Club**

As part of Valletta Cruise Port's corporate social responsibility program, Valletta

Cruise Port personnel organised an annual carnival party for local children's homes in Magazino Hall, where children are treated to an afternoon of fun, entertainment and nibbles. Attending children are gifted with a goody bag containing educational and novelty items to enjoy later.

Similarly, a summer BBQ is organised for children from local homes and their carers, while lunch for youths residing at Mount Carmel Hospital is held over the Christmas period at one of the restaurants on the Valletta Waterfront.

The objective of these events and other projects coordinated by the Valletta Cruise Port Social Club is to make a long-lasting impact on the lives of the children and youths residing in these homes, and support the efforts of Valletta Cruise Port's philanthropic commitment toward local communities.

## **Education**

Singling out contributions to education, the Group:

Sponsored a nationwide Elementary Schools Study Books Support Campaign organized by a national newspaper in 2007, and contributed to a project run jointly by UNICEF and the Ministry of Education to construct two classrooms in Şanlıurfa-Harran.

Completed the construction of dormitories at Erzincan University Refahiye Occupational High School in 2009. The İzzet Y. Akçal Refahiye Student Dormitories comprise 40 separate units in three blocks.

Completed construction of Adnan Menderes University Tourism and Hotel Management College Group in collaboration with the Ministry of Education. The College, since opening its doors in 2009, has produced qualified human resources for the Turkish hospitality industry, while contributing to the cultural richness of Kuşadası and its environs.

Completed construction of a 32 classroom elementary school in the town of Denizli in December 2010. In the same period it donated clothing, text books and supplies to the elementary school of the Muş Beşçetak village and also donated computers to numerous schools.

Established the library of Şırnak İpekyolu Primary School in 2012, with the aim of contributing to children's personal and educational development. Furthermore, the Group donated computers to Istanbul Dumlupınar Primary School, in parallel to its corporate citizenship commitment.

Undertook numerous initiatives to benefit the community in the Group's home city of Kuşadası and the area surrounding the Port and since 2003 in particular contributed to the community and the Adnan Menderes University Tourism and Hotel Management College. This has included the donation of computers and other equipment to local schools, as well as funding to rehabilitate local beaches, and technical assistance to Turkish state-run institutions. In addition to providing donations to various charities and regular support of those in need, Ege Ports also sponsored local motor sports clubs and provided financial support for the replanting of forest land damaged by fire.

Purchased art inspired by major contemporary and modern Turkish artists from İstanbul Modern, and sent as New Year's gifts to support the museum.

## **SUPPLIER RELATIONS**

We expect our suppliers with whom we work to comply with our sustainability approach and business principles. We manage a vast operation involving more than 3,000 suppliers located in different countries and regions. As a part of the sustainability approach we have adopted, we take into consideration social and environmental criteria in choosing the suppliers across our entire supply chain, in addition to the classic approaches regarding quality and price. We expect the third parties with whom we work to comply with the human rights, working conditions, environmental awareness and anti-corruption principles of the UN Global Compact without compromising any transparency and accountability principles.

As Holding, in the selection of our suppliers, we look for the restrictions regarding child and forced labour and do not tolerate any contrary practices. Besides this integrated approach, our expectations from our suppliers' change based on products and services in different sectors.

While supplying products which require environmental and social footprint consideration, we expect the suppliers to hold international standards (ISO14001 Environmental Management System and OHSAS 18001 Occupational Health and Safety Management System) and required certifications in the procurement of products conscious to environmental and social issues. We expect all third-party suppliers to act in compliance with Global Investment Holdings' Environmental Policy.

In port operations and the real estate sector, suppliers in possession of a score above a certain level are included in the Approved Suppliers List according to the supplier assessment criteria, following a market research conducted on the product or service to be procured.

In the energy generation/gas/mining sectors, we expect our contractor companies to have effective management in occupational health and safety which is a high-risk issue. We expect service providers to obtain professional services from experts and provide occupational training to their employees on OHS.

**More information on our sustainability practices are available at our [Sustainability Report](#).**

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