SUPPLIER CODE OF CONDUCT

Marmara Diving Denizaltı Hizmetleri Tic. Ltd. Şti. | Doc. No: QP-106-A03 | Rev. 00 | 15 October 2026

1. About Marmara Diving

Marmara Diving Denizaltı Hizmetleri Tic. Ltd. Şti. ("Marmara Diving") has since 2005 provided commercial diving and subsea engineering services from its base in Tuzla, Istanbul. Our work covers submarine pipeline installation, marine construction, underwater survey, offshore support and salvage, carried out in Türkiye and internationally.

We operate an Integrated Management System certified to ISO 9001, ISO 14001 and ISO 45001, and We operate in accordance with IMCA standards. Our operations are performed in an environment where a lapse in safety, quality or integrity can cost a life. This is why we hold ourselves — and the companies who supply us — to a demanding standard.

2. Statement of the Management

Marmara Diving is committed to conducting its business responsibly. We want to be an employer people are proud to work for and the contractor our clients turn to first.

This Supplier Code of Conduct sets out the principles of business conduct we expect from you as a supplier or subcontractor to Marmara Diving. We apply the same principles to ourselves. We wish to do business with organisations that act with integrity, that protect the people who work for them, and that take responsibility for the effect of their work on the environment and on the communities around them.

These principles are not aspirational statements. They form part of the agreement between us, and we act on them.

If you face a dilemma, or if you are unsure how this Code applies to a particular situation, please raise it with your contact person at Marmara Diving rather than resolving it alone.

3. To Whom This Code Applies

3.1 This Code applies to all suppliers and subcontractors providing products or services to Marmara Diving. In this Code, "you" refers to that supplier or subcontractor.

3.2 This Code forms an integral part of the agreement between you and Marmara Diving, alongside the General Purchasing Terms and Conditions (QP-106-A01).

3.3 We require you to promote equivalent principles in your relationships with your own clients, suppliers and business partners.

THE PRİNCİPLES

4. Business Conduct

As a supplier to Marmara Diving, in conducting your business:

- You supply products and services of high quality, as sustainably as is reasonably practicable, at competitive market prices, and you perform contracts to the agreed standard and schedule, keeping us accurately and promptly informed;
- You do not tolerate bribery or corruption in any form. You do not offer, pay, request or accept bribes, facilitation payments or any other favour intended to obtain or confer an improper business, financial or personal advantage;

- You permit gifts and hospitality only where they are reasonable, given in the ordinary course of business, lawful, and not intended to influence a decision;
- You make no contribution or donation, in money or in kind, to political parties, political office holders or candidates for public office, whether on your own behalf or on behalf of Marmara Diving;
- You carry out no activity subject to international or national sanctions and have no dealings with sanctioned persons. You comply with applicable export control law for military and dual-use goods and services;
- You compete fairly and comply with applicable competition law;
- You process and protect personal data in accordance with the Turkish Personal Data Protection Law No. 6698 (KVKK) and, where applicable, the GDPR;
- You maintain the confidentiality of competitive and proprietary information;
- You respect and protect intellectual property rights;
- You avoid any situation in which a personal or financial interest conflicts, or may appear to conflict, with the interests of Marmara Diving or with objective performance of the work. Where such a situation arises, you disclose it to us promptly;
- You select your own suppliers on accepted market principles and consistently with this Code, you pay fair prices, and you pay them on time;You are a responsible taxpayer and manage your tax affairs accurately and transparently;
- You do not share information about your work for Marmara Diving through the press, broadcast media, social media, the internet or otherwise without our prior written approval. This includes photographs and video of work performed for us.

5. Human Rights and Labour

Marmara Diving respects the dignity, well-being and human rights of everyone involved in our operations and in the communities where we work. In this respect:

- You align yourself with the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, and you comply with applicable labour law, including the conventions of the International Labour Organization;
- You treat everyone in the course of your business with dignity, respect and fairness;
- You seek to identify adverse human rights and labour impacts caused by your activities before they occur, and take appropriate steps to avoid, minimise or mitigate them;
- You do not tolerate forced or involuntary labour, modern slavery or human trafficking in any form, and you work actively to prevent these practices in your operations and projects;
- You do not tolerate child labour and you comply with the statutory minimum working age;
- You respect your employees' rights to freedom of association and collective bargaining;
- You support a working culture based on trust and recognition, in which your employees can put this Code into practice;
- You communicate clearly and are open to suggestions, ideas and feedback;
- You are committed to preventing discrimination, sexual and other harassment, bullying, intimidation and abuse of authority. You accept no discrimination on grounds of race, colour, nationality, ethnic or social background, age, religion, political opinion, gender, pregnancy, sexual orientation, marital status, disability, trade union membership, or any other characteristic protected by law;
- You apply fair employment practices, offer competitive terms of employment, and ensure your employees receive a wage that covers their own and their family's basic needs;
- You comply with applicable law and industry standards on wages, working hours and rest periods. For personnel deployed on diving and offshore operations, you observe the applicable rest and fitness-to-work requirements without exception;
- You ensure that every employee works under a freely agreed, written employment contract with clear terms, in a language they understand.

6. Environment and Society

We work in the sea. The consequences of what we do are visible in the water and on the coast, and we treat that as our responsibility. In this light:

- You comply with applicable international and national environmental law, including MARPOL where it applies to your operations;
- You pursue a policy of preventing or limiting pollution of soil, water, air and the marine environment, and of limiting light and noise pollution, waste generation and the use of hazardous materials. This includes segregated collection and processing of waste and the efficient use of water and energy;
- You maintain a zero oil spill ambition across all your activities and you have arrangements in place to contain and report any spill immediately;
- You respect the rights of the communities in which you work, including those whose livelihood depends on the coastal and marine areas where operations take place;
- You protect marine habitats and protected species affected by your operations, and comply with any environmental permit conditions applicable to the site;
- You treat environmental and social risk management as a priority, seeking to identify adverse impacts before they occur and taking appropriate steps to avoid, cease, minimise or mitigate them;
- You promote environmental awareness among your employees and those working on your behalf.

7. Safety, Health and Quality

Marmara Diving works to the highest safety, health and quality standards attainable. Diving is an activity in which the consequences of a shortcut are irreversible. As a supplier to Marmara Diving:

- You make safety and health the first priority in everything you do, and you take care of the safety, security and health of everyone involved in your activities;
- You demonstrate a commitment to preventing accidents, and you offer, promote and continuously improve safe and healthy working conditions within your organisation;
- While working for Marmara Diving, you comply with our SHE-Q Policy, our permit-to-work system, and our site induction requirements under procedure SP-111;
- You operate and continuously improve an occupational health and safety management system;
- You operate and continuously improve a quality management system covering your business processes;
- You employ dedicated, professional, qualified and experienced personnel, and you verify their certification, competence and medical fitness before deployment;
- Where diving operations are within your scope, you comply with IMCA requirements, you appoint a competent Diving Supervisor in writing for each operation, you maintain current test and certification records for all diving equipment, and you have hyperbaric medical support and emergency evacuation arrangements in place before mobilisation;
- You ensure that any vessel in your fleet complies with the International Safety Management (ISM) Code and holds valid classification and statutory certification;
- You report every accident, incident, near-miss, environmental release and dangerous occurrence to us without delay and in any event within twenty-four (24) hours;
- You stop work whenever it cannot be carried out safely. Neither Marmara Diving nor any client requirement overrides this. No commercial or schedule pressure originating from us is ever a reason to continue unsafe work, and stopping work on these grounds will never be held against you.

APPLİCATİON AND GOVERNANCE

8. What We Expect From You

Compliance with this Code is essential to the way Marmara Diving does business. We therefore expect you to avoid any conduct that constitutes, or could constitute, a breach of this Code — regardless of where you are working and of local custom in that country, and even where you believe that the conduct would benefit Marmara Diving.

9. Governance

9.1 Compliance with this Code forms part of our supplier qualification assessment under form FR-032 and of our periodic supplier performance evaluation under form FR-034.

9.2 Where we identify concerns, we will normally raise them with you and give you the opportunity to improve. Where we consider that you are failing to comply with a material principle of this Code, we are entitled to suspend or withdraw your approved status on the Approved Supplier List (FR-033) and to terminate the agreement between us in accordance with Article 18 of the General Purchasing Terms and Conditions.

9.3 This Code is reviewed by the Management Representative and approved by the General Manager every two years.

10. Raising a Concern

10.1 If you become aware of conduct that breaches this Code — whether by your own personnel, by our personnel, or by anyone else connected with our operations — we ask you to report it.

10.2 Reports may be made to your contact person at Marmara Diving, or, where that is not appropriate, directly to the Management Representative at kalite@marmaradiving.com or to the General Manager.

10.3 Reports may be made confidentially on request, and may be made anonymously. Marmara Diving does not tolerate retaliation of any kind against anyone who raises a concern in good faith.

10.4 Commercial and contractual disputes fall outside this procedure and should be raised with your contact person or dealt with under the terms of the applicable contract.

11. Where to Find This Code

This Supplier Code of Conduct is available at www.marmaradiving.com and is issued with every purchase order. If you have any question about it, please contact your usual contact person at Marmara Diving or write to kalite@marmaradiving.com.

Olcay Uz

Director

Marmara Diving Denizaltı Hizmetleri Tic. Ltd. Şti.