

**Netsel Marina**

**Community Investment Policy**

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## 1. PURPOSE AND SCOPE

The purpose of this Community Investment Policy (“**the Policy**”) is to put forward the principles to adopt while developing community investment initiatives. Netsel Marina recognizes the impact of its operations on its stakeholders, the environment, and community at large and emphasizes significance of sustainable development.

This Policy, which is an integral part of Netsel Marina Code of Ethics<sup>1</sup>, is developed to demonstrate Netsel Marina’s commitment to making a positive impact on the welfare and sustainable development of related communities and the environment engaged with as a corporate citizen.

Netsel Marina is committed to conducting business in conformity with the highest ethical standards. Netsel Marina complies with and ensures that Netsel Marina acts in compliance with UN Global Compact’s 10 Principles.

## 2. DEFINITIONS

“**Netsel Marina**” refers to Netsel Tourism Investments A.Ş. and all companies directly or indirectly, solely or jointly controlled by Netsel Tourism Investments A.Ş., as well as the joint ventures included in the consolidated financial statements of these companies. Any new marina branches or companies that are directly or indirectly controlled by the companies listed above during the period this Policy remains in effect are also included in the definition of “Netsel Marina.”

“**Social Investment**” refers to strategic relationships and collaborations established by the company with individuals and legal entities to address social and environmental issues with the aim of achieving long-term corporate benefits and enhancing reputation.

“**Sustainable Development Goals**”<sup>2</sup> refers to the 17 goals that form part of the “2030 Agenda for Sustainable Development,” a 15-year plan adopted by UN Member States to address global challenges related to poverty, inequality, climate, environmental degradation, welfare, peace, and justice.

“**The UN**” means the United Nations.

“**The UN Global Compact**”<sup>3</sup> is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, the environment and anti-corruption.

## 3. GENERAL PRINCIPLES

Netsel Marina conducts “Due Diligence”<sup>4</sup> on organizations or individuals to ensure that Community Investments are met by the reliable parties with sound purposes.

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<sup>1</sup> Please refer to Netsel Marina Code of Ethics for details.

<sup>2</sup> <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

<sup>3</sup> <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

<sup>4</sup> Please refer to Netsel Marina Sanctions and Export Controls Policy

Netsel Marina ensures that Community Investments, including those with organizations or individuals, abide by Netsel Marina Ethics Code, Human Rights Policy, Donations and Sponsorship Policy, Anti-Bribery and Corruption Policy and other relevant policies.

Applying to memberships of the regional, national, or international organizations, or being signatory to agreements related to Community Investments require ensuring compliance with the UN Global Compact Principles as it may affect Netsel Marina’s reputation.

**4. APPLICATION OF THE POLICY**

While making Community Investments, in line with Netsel Marina Sustainability Guide<sup>5</sup>, Netsel Marina consider the following:

- whether the relevant Community Investment is compatible with the priorities and needs of the regions where business activities are carried out,
- Providing a clear connection between Community Investment activities and business strategy,
- Establishing strong partnerships with civil society organizations, international organizations, universities or individuals in order to put forward applicable solutions,
- Ensuring that the objectives and results of the Community Investments are measurable and scalable by design, and the results have the potential to be disseminated across other businesses and regions, and
- Ensuring that they are aligned with the social and environmental goals, as mentioned in the UN Sustainable Development Goals.

**5. AUTHORITY AND RESPONSIBILITIES**

This Policy is to provide guidance in developing Community Investment initiatives for all employees, directors and officers of Netsel Marina. If you notice any action you believe to be inconsistent with this Policy, you are required to seek guidance from Netsel Marina Sustainability Unit, the responsible function.

**6. REVISION HISTORY**

This Policy, adopted by Netsel Marina, entered into force with the approval of the Board of Directors on \_\_\_\_\_2024, and is maintained by the Legal and Compliance Counsel.

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<sup>5</sup> [www.netselmarina.com](http://www.netselmarina.com)