

1. PURPOSE

The purpose of this policy is to ensure that Girişim Elektrik A.Ş. fully complies with all applicable laws and regulations related to the import and export of goods, technologies, and services, including international trade sanctions and embargoes.

2. SCOPE

This policy applies to all employees, departments, subsidiaries, and business partners involved in international trade activities of Girişim Elektrik A.Ş.

3. POLICY STATEMENT

Girişim Elektrik is committed to conducting its import and export activities in accordance with:

- Turkish Customs and Trade Regulations,
- European Union (EU) Dual-Use Export Controls,
- United States Export Administration Regulations (EAR) and Office of Foreign Assets Control (OFAC) Sanctions,
- United Nations Security Council Sanctions,
- Any other relevant national or international sanctions and embargoes.

Under no circumstances shall Girişim Elektrik engage in trade with individuals, companies, or countries subject to embargoes or trade restrictions.

4. RESPONSIBILITIES

- **Export/Import Department** is responsible for checking goods, destinations, and parties against sanctioned lists before shipment.
- **Procurement and Sales Teams** must ensure that no transaction is initiated without prior compliance verification.
- **Compliance Officer** is responsible for updating sanction lists and providing awareness training.

5. RISK-BASED SCREENING

All international transactions (import/export) must be screened for:

- Restricted or dual-use items,
- Sanctioned countries or regions,
- Denied parties or individuals.

6. RECORD KEEPING

All documents related to import/export transactions must be retained for at least 5 years, including customs declarations, invoices, and screening results.

7. TRAINING & AWARENESS

Relevant employees shall receive periodic training on export control regulations, sanctions, and internal compliance procedures.

8. VIOLATIONS

Any suspected violation of this policy must be reported to senior management. Disciplinary actions may be taken, including contract termination and legal escalation if necessary.

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