



Business Ethics & Code of Conduct



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**PROTECTING OUR
RELIABILITY AND
REPUTATION is the
fundament of our
business**

**Acting in line with
YENIGUN's corporate
values**

Our Principles of Business Ethics and Codes of Conduct are built on this solid foundation to help us achieve continuous progress.

Dear Staff Members,

In today's world dominated by international competition where rapid change is an inevitable requirement, it is a success in itself for companies to stay afloat for long years without compromising their dignity, and what underpins this success are quality, stability and rapid adaptation to current conditions, while commitment to one's values and maintenance of a strong team spirit are at least as important. The presence of a team that does not compromise the core values of the company while keeping pace with the rapid and intensive tempo of the business world, solidified with a strong sense of belonging towards the company and a sincere bond with co-workers, is essential for a company to take firm steps towards its goals without losing its bearing or essence.

As a company that has remained faithful to the principles of reputability, honesty and reliability under any and all conditions ever since the day of its foundation, we are well aware that we owe our success on the international arena for more than 40 years to the fact that our staff members from every level of our company have indigenized all of these principles at the bottom of their heart.

We must not forget that while companies are entities living on paper, they are kept alive and afloat by their employees who perform their tasks with due diligence, remain loyal to their job and their team of co-workers, and always act with full awareness of their responsibilities. This is why we attach such great importance that the core values of YENIGUN are internalized by every single member of our staff.

This Business Ethics & Code of Conduct Guidelines have been issued to put in writing the verbal rules and behavioral patterns which we have been implementing for years, with the aim to acquaint our newly recruited staff members with YENIGUN's principles and to create a common language for all of us.

We hope that the principles set forth in these guidelines will be our compass in the days to come just as they did up to the present day, and that they will serve as a lodestar for all of us in the many projects of huge success that we will accomplish in future.



Fikret Yenigun
Board Member & General Manager

Business Ethics & Code of Conduct

The reputation of YENIGUN depends on the behaviors of each and all of us.

These “Business Ethics & Code of Conduct” Guidelines have been issued by YENIGUN to

- define the minimum requirements that must be satisfied to maintain our values as a manifestation of who we are and how we work in line with the ideal to “become one of the largest 10 international construction companies in Turkey by establishing strategic partnerships in diverse areas and countries”
- by protecting the core values of **reliability, fairness, impartiality, transparency, and conscious responsibility**
- while always keeping in mind our raison d’être which is to “become a deep-rooted construction company which shares with its stakeholders the happiness, satisfaction and reputation and with its staff members the pride and gains earned through its capability to complete the contracted structures at the desired quality and in timely manner without deviating from the planned profitability rates”.

Purpose

The purpose of these Guidelines is to ensure the continuity and internalization of the business ethics principles based on honesty and trust that YENIGUN has been practicing for years, help our employees to act in accordance with their responsibilities from the bottom of their heart, and protect our reputation.

Scope

These Guidelines apply to all staff members including the board of directors and the top management as well as all third parties that act on behalf of YENIGUN, in all activity areas of the company.

To act with a sense of responsibility is not only a right, but at the same time also a duty. Each employee must adjust their behavior in their field of duty according to the rules set forth herein.

Cooperation with Contractors, Subcontractors, Suppliers and all Business Partners

Fair competition

The relations we establish with our stakeholders are always built on the principles of trust - integrity - honesty - transparency.

We treat people the way we want to be treated.

YENIGUN always adheres to fair competition principles, and it always obeys the laws applicable in this regard in the countries where it does business.

Every employee is obliged to comply with laws that prevent the restriction of competition. In addition, the employees of YENIGUN must know which company information is commercially sensitive, while it is strictly forbidden to share such information with competitors.

Bribery and corruption (offering or accepting advantage)

For YENIGUN, bribery and corruption are unacceptable under any circumstance whatsoever. All sorts of unlawful payment and transaction are forbidden.

All kinds of written verbal agreements and additional agreements aimed at providing an advantage directly or indirectly to individuals or organizations within scope of our processes are prohibited. Such advantages are forbidden in all cases, whether in form of cash or as gift.

Relations with Suppliers, Subcontractors and Business Partners

All offers are examined fairly-unbiased-without prejudice. Evaluation and approval of offers, placement of orders, and processing as defined in business processes are performed in full transparency. Any undue selection or exclusion of subcontractors or suppliers is prohibited.

The company's purchase processes are performed according to the principle "trust does not preclude control".

In the purchase process, the supplier's concrete technical data and the supplier's performance according to the offer comparison table shall be taken into consideration, instead of references such as fellow townsmen, neighbors or close friends.

Purchase personnel shall not enter into any relation with suppliers outside their scope of duty and they shall not show emotional behavior on grounds of respect, affection or fidelity.

We expect that our business partners also abide by these values.

We exercise due diligence to protect the confidential information of individuals and organizations we work with, and we do our best to fulfill our obligations on time and in the way we promise.

Our personnel is the source of our existence

We can achieve our goals only by the renunciative contributions of all company employees.

Equal Opportunity, Diversity

We respect the fundamental human rights and freedoms. As a multinational company, we strictly disallow any unlawful treatment, harassment or humiliation against any of our employees or business partners. We disapprove all sorts of discrimination on the basis of race, ethnic origin, gender, religion, world view, political tendency, disability, age or sexual orientation.

We provide equal opportunity for employees at equal conditions, and we stand at equal distance to all of our employees and have respect for private live and individual space.

Fair Labor Conditions

We provide fair wage and fair labor conditions, and pay regard to the balance between business life and private life. We disapprove all sorts of child labor, no matter in what form or shape.

Preventing Conflicts of Interest

We attach great importance to the prevention of any conflicts of interest or loyalty.

Our employees are not allowed to enter into any business relationship of mutual or unilateral benefit with their family members, friends or other third parties associated with them in any way. Full-time employees of YENIGUN may not work for or pursue business on behalf of any other company or person.

A written approval must be obtained via HR Department in the event an employee intends to engage in extra jobs to make extra gains.

Protecting the Company's Assets

The employees are obliged to protect all tangible/intangible assets of the company. Unlawful acts such as fraud, theft, embezzlement or money laundering will result in criminal proceedings.

All our plants, machinery and equipment may not be used beyond work-related purposes, unless their private use explicitly permitted. The sales of all kinds of machinery and fixed assets shall be performed according to relevant directives, regardless of their value.

E-mails and Internet use

YENIGUN makes use of information technologies and systems (computer, server, networks, databases, e-mail etc.) to run its business. The use of these systems to send fraudulent, illegal, harassing, offensive or obscene pictures, messages or mails (including those that involve racism or sexual harassment) is strictly forbidden.

The e-mail address of YENIGUN shall not be used for personal/private purposes.

It is strictly forbidden for Internet users to visit, share or forward the contents or information obtained from websites that arouse racial hatred, propagandize compulsion/violence, incite the commitment of other offenses or have immoral contents.

Use and sharing of in-house information

In-house company information shall be kept confidential. Disclosure of information about in-house company secrets to third parties is prohibited. This prohibition shall survive even after termination or expiry of the employment contract.

Privacy and data security: Exchange of information in electronic environment and on global scale is essential for effective work and business success, but there are also some risks in terms of privacy and data security. Therefore, in-house document-file-paper-data carriers must be protected against unauthorized access by third parties. Taking necessary precautions in this regard is the duty of all our employees, especially our managers.

Taking advantage of in-house information: It is prohibited to gain or provide advantage for oneself or for others using information that belong to the company. This prohibition also includes the unauthorized transfer of in-house information to third parties.

Proper recording and reporting: All employees are obliged to make truthful statements in verbal or written reporting inside the company or in verbal or written declarations outside the company. Any manipulation / alteration on reports or texts is prohibited.

Political activities

YENIGUN does not participate in activities of political parties. It is essential that our employees participating in political events act with the awareness that they do not represent YENIGUN. Our employees shall in no condition use the company name, their position, and title or company resources for political purposes, and they shall not participate in such activities during working hours.

We welcome our employees to engage in activities of public benefit outside working hours, to show interest in social issues, to participate in social activities or charity projects. However, they may not use the company name in such activities, and we must make sure that there is no conflict of interest between their duties and these activities.

Health, Safety and Environment

It is the duty of all our employees to ensure that people get never exposed to danger in their workplaces, to minimize possible adverse impacts on nature and the environment, and to use the available resources economically.

Quality

We are all responsible to ensure that the works we do comply with established quality standards. Deliberate behaviors and negligence that might impair quality will not be tolerated in any circumstance.

Implementation

What you need to do in case of doubt is to unveil the problem and deal with it openly.

Ethical Committee

An Ethical Committee responsible for the implementation and enforcement of the “Business Ethics & Code of Conduct Guidelines” has been formed at our company. The members of the committee whose names and duties are listed below are authorized contact persons with regard to “Business Ethics & Code of Conduct Guidelines”, and they are in charge for ensuring their implementation.

Employees, suppliers and subcontractors may contact any member of the committee for any questions or information requests they may have despite all the information provided to them.

Reporting of violations, suspicions, complaints and suggestions

All employees, suppliers and subcontractors have the right to report/notify violations or suspected violations of the “Business Ethics & Code of Conduct Guidelines”.

To that end, they may contact any member of the committee. Any person exercising this right can be sure that this will not bear any adverse consequences for him/her. YENIGUN will take all necessary measures to protect the employees and solution partners who report a violation or suspected violation and keep confidential their identity.

It is very important that the issue is described in detail so that the anonymous notifications can be examined effectively. The decision of whether the matter is worthy of investigation depends on whether there is sufficient information in the application. The means available for application are as follows:

[Directly to whom it may concern \(verbal or written\)](#)

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www.yenigun.com.tr/etik/

[+90 312 468 28 68](tel:+903124682868)

Consequences

Violation of YENIGUN’s “Business Ethics & Codes of Conduct” may result in disciplinary punishment, termination of the employment contract with or without advice, and reporting of the issue to the required public bodies.

Compliance Committee: 1 Board Member (Chairman), 1 Legal Counsel, 1 Deputy General Manager, 1 Ethics Officer.