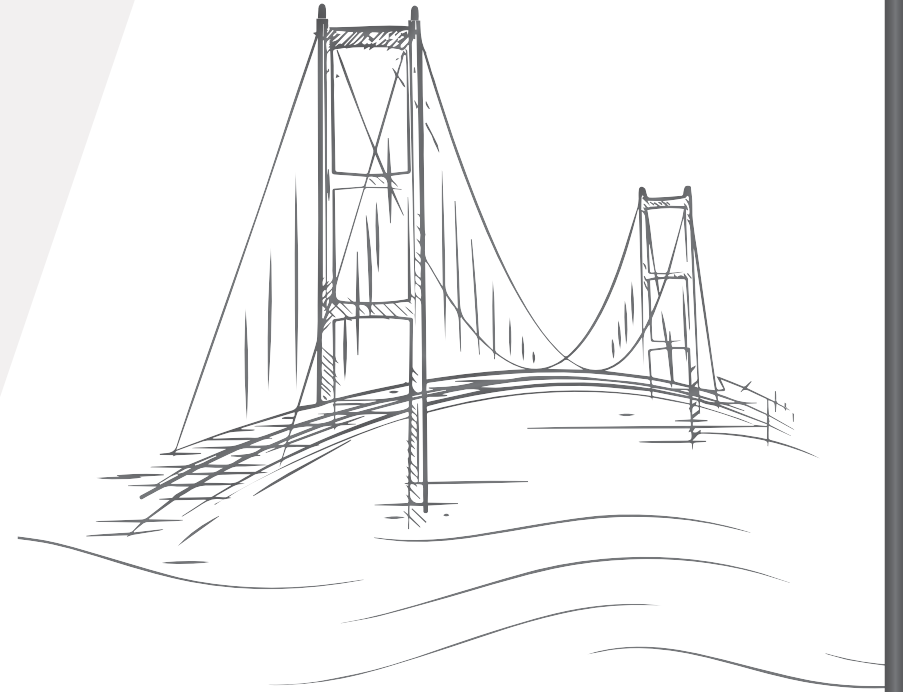


**ÇANAKKALE MOTORWAY AND BRIDGE**  
**SANCTIONS AND EXPORT**  
**CONTROLS COMPLIANCE**  
**POLICY**



**1915ÇANAKKALE**

## PURPOSE AND SCOPE

ÇOK A.Ş. Sanctions and Export Controls Compliance Policy (Policy) defines the minimum standards and criteria established by ÇOK A.Ş. to ensure compliance with international economic sanctions and export control obligations.

ÇOK A.Ş. aims to ensure that its business processes and operations comply with the economic sanctions and export control obligations imposed by the Republic of Türkiye, the United Nations (UN), the United States of America (US), the European Union (EU), the United Kingdom (UK), the French Republic, and other relevant jurisdictions to the extent applicable.

Under this Policy, all employees, managers, shareholders, and affiliates of ÇOK A.Ş. must act in accordance with the obligations related to international economic sanctions and export controls. In the same vein, ÇOK A.Ş. expects all its business partners to act in accordance with this Policy and takes the necessary steps in this regard.

Please note that violations of sanctions and export control legislation are extremely serious offences that can lead to personal criminal liability and significant fines for the ÇOKAŞ. It is therefore crucial that you understand the applicable restrictions and preventative requirements before entering into any business relationship to be subject to special sanctions compliance preventative measures.

## DEFINITIONS

**EU (European Union):** Refers to the European Union

**US Sanctions:** Refers to sanctions imposed by the US Federal Government and related agencies.

**UN Sanctions:** Refers to sanctions imposed by the United Nations Security Council and supported by member countries.

**Export Control Regulations:** Laws and regulations governing the import, export, and re-export of technology, information, products, and services for reasons of trade, foreign policy, and national security.

**Embargo:** Refers to the prohibition of trade in goods and services with certain countries for economic or political reasons.

**Sanctions:** Economic or financial sanctions or trade embargoes imposed or enforced by the Sanction Authorities of the United States Federal Government, the United Nations Security Council, the European Union, the United Kingdom, the Republic of Türkiye, or another authority with relevant jurisdiction, as well as Export Control Regulations.

**Sanction Target:** Refers to individuals, entities, countries, and other assets targeted by sanctions.

- Any person, entity, vessel, or government subject to sanctions (“Listed Persons”)
- Entities that are directly or indirectly owned 50% or more by one or more Listed Persons;
- As of the publication date of the most recent version of this Policy, individuals residing in, and legal entities established or registered in, countries or regions subject to comprehensive country- or region-based sanctions (“Embargoed Countries”), including Crimea, Cuba, Russia, Iran, North Korea, Syria, Venezuela, the so-called Donetsk People’s Republic and the so-called Luhansk People’s Republic, as well as non-government-controlled areas of Ukraine’s Kherson and Zaporizhzhia oblasts; and
- Persons, entities, vessels, or aircraft owned or controlled by, or acting on behalf of, the governments of Embargoed Countries

Embargoed Countries and Listed Persons are determined based on applicable international sanctions in effect. Accordingly, any changes over time to the lists of sanctioned countries or persons do not necessitate an amendment to this Policy.

**Business Partners:** Suppliers, contractors, any representatives acting on behalf of and for the account of the Company, subcontractors, consultants, and other third parties entering into a business relationship with ÇOK A.Ş., as well as the employees and representatives of the aforementioned parties.

## GENERAL PRINCIPLES

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ÇOK A.Ş. is committed to taking effective measures to comply with national and international sanctions and export control regulations. ÇOK A.Ş. does not establish direct or indirect commercial relations with Sanction Targets or Embargoed Countries.

In cases of any uncertainty or exceptional circumstances within the Company, it will conduct the necessary authorization and approval processes with the relevant administrative authorities to ensure that transactions do not violate sanctions.

ÇOK A.Ş. complies with all applicable laws and regulations in the countries in which it operates and, obtains any required licenses, where applicable to avoid engaging in activities subject to Sanctions.

In addition, ÇOK A.Ş. conducts due diligence to determine whether its Business Partners are subject to Sanctions and carries out regular monitoring activities. In the event of any non-compliance, the relevant transaction is immediately suspended, and the necessary reports are submitted to the relevant administrative authorities upon request.

## IMPLEMENTATION OF THE POLICY

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ÇOK A.Ş. conducts due diligence to identify Sanction Targets and performs these activities regularly before establishing any legal or commercial relationship and throughout the duration of the business relationship.

In the event that any breach of sanctions or export control regulations is identified, ÇOK A.Ş. informs the relevant authorities as required by national or international administrative authorities and takes the necessary actions.

ÇOK A.Ş. incorporates relevant provisions into its contracts entered into with its Business Partners to ensure their compliance with this Policy.

ÇOK A.Ş. ensures that all payment and collection transactions are carried out in accordance with the legislation of the countries in which it operates and are recorded appropriately in its own records. ÇOK A.Ş. cannot be involved in activities related to money laundering, terrorism, or the financing of weapons of

mass destruction. To this end, it ensures the accuracy of financial and commercial records in accordance with all applicable national and international legislation. It keeps records of all activities in a secure and appropriate manner.

## INFORMATION REQUESTS

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ÇOK A.Ş. may receive information requests from banks or correspondent banks regarding certain transactions. Responses to information requests related to sanctions must be accurate, complete, and free of misleading information. Information requests and responses must be properly documented and archived in electronic format.

## REPORTING

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ÇOK A.Ş. takes into account the opinions of its stakeholders. We have reporting mechanisms in place that encourage open feedback from business partners, managers, and employees.

If you suspect any action that constitutes a violation of this Policy or relevant national or international legislation, ÇOK A.Ş. encourages you to disclose the incident through the notification channels listed below:

**Telephone:** You may call **0212 800 65 81**

**E-mail:** You can send an e-mail to **[cok.ethics@speak-hub.com](mailto:cok.ethics@speak-hub.com)**

**Disclose Form:** You can fill out the disclose form on **[www.speak-hub.com/cok-ethics](http://www.speak-hub.com/cok-ethics)**

## **DISCIPLINE**

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Any violation of this Policy may result in serious disciplinary measures, including termination of employment relationship for ÇOK A.Ş.'s employees and executives. In any cases where this Policy is violated by third parties, their contracts may be terminated. Any behaviour contrary to this Policy shall be evaluated by the SPV Directors in accordance with the principles and procedures established by applicable local and international laws and regulations, and shall be resolved in accordance with the recommendations of the Ethics and Compliance Committee.

## **DOCUMENT UPDATING, STORAGE AND PUBLICATION**

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ÇOK A.Ş. ensures that this Policy is the most up-to-date version of in force and publicly available. This Policy and its previous revisions are retained indefinitely within ÇOK A.Ş. document management systems. In case a revision to this Policy is required, the Ethics & Compliance Committee is responsible for conducting the necessary revisions and announcing the revision to all parties affiliated with this Policy.

This Policy entered into force pursuant to the Board of Directors decision dated 17.09.2025.