PROJECT HEALTH, SAFETY, SECURITY, SOCIAL AND ENVIRONMENTAL POLICY

915 CANAKKALE

Çanakkale Otoyol ve Köprüsü İnşaat Yatırım İşletme A.Ş. (ÇOK A.Ş). is committed to maintain and develop a pro-active health, safety, security, social and environment culture throughout the Project.

General

- ÇOK A.Ş. commits to have effective management systems in place through the design, construction and operation phases of the Project. Through the implementation of management systems; social, environmental and health and safety risks and impacts shall be assessed and mitigated to ensure legal compliance, meet Lenders' requirements, respect human rights.
- ÇOK A.Ş. commits to comply with all applicable permits, approvals and Lenders' requirements
- The ultimate aim of ÇOK A.Ş. is to achieve, if not exceed, the expectations and satisfaction of the KGM and Client's Representative, as well as the Project Lenders and beneficiaries; to make the citizens of Turkey proud of their world-class transportation facilities.
- ÇOK A.Ş. commits to communicate this policy to all levels of its organization, its contractors, subcontractors and substantive suppliers
- Chief Technical Officer of ÇOK A.Ş. is the main responsible for ensuring conformance with this policy and execution of this policy.

Health & Safety and Environment

- ÇOK A.Ş. shall plan and establish objectives and strategies, plan activities in advance of implementation, monitor and continually endeavour to improve processes and eliminate non- conformity, accidents, environmental incidents, rework, wasted time and avoidable costs.
- ÇOK A.Ş. shall ensure that their main contractors will develop an HSE Management System in accordance with OHSAS 18001: 2007 and ISO 14001:2015 for 1915 Çanakkale Motorway and Bridge Project, to provide a more effective, encompassing and concise system conducive to modern-day Good International Industry Practice (GIIP). ÇOK A.Ş. shall encourage its contractors to continually improve its HSE management system and implementations.
- ÇOK A.Ş. shall ensure that all persons involved in the Project are aware of the HSE requirements and that they are properly experienced, trained, inducted and qualified for their duties before commencing work.

ÇANAKKALE OTOYOL VE KÖPRÜSÜ İNŞAAT YATIRIM VE İŞLETME A.Ş. (ÇOK A.Ş.)

• ÇOK A.Ş. shall emphasize its 'Safety First' philosophy for this Project at all stages of the Project.

915 CANAKKALE

- ÇOK A.Ş. management adopts the basic principle of protecting the environment and commits to set up pollution prevention and waste management requirements during construction activities.
- ÇOK A.Ş. is committed to construct and operate the Project in a Safe manner; respecting the Environment, and to complete the Project on time to the agreed completion date.

Social

- ÇOK A.Ş. shall employ its employees and provide labour and working conditions in accordance with international standards through its Employment Policy and ensure that the contractors and subcontracts shall follow the same standards.
- ÇOK A.Ş. is committed to prevent the employment of young employees less than 18 years old.
- ÇOK A.Ş. adopts the basic principle of protecting people during all activities and commits to take all necessary precautions to not to harm people. All possible negative impacts on human health, safety and living environment shall be avoided, and if unavoidable, they shall be reduced, mitigated or compensated appropriately.
- ÇOK A.Ş. commits to take appropriate measures to prevent pollution of soils, surface and groundwaters, to protect watersheds and ecosystems used by communities.
- ÇOK A.Ş. commits to apply mitigation measures to minimise risks and impacts of accidents, to minimise environmental, social and health risks through complying local legislation and Lenders' requirements.
- In order to protect and preserve cultural heritage and comply with Turkish legislation and Lenders' requirements; COK A.Ş. shall make all efforts to identify cultural properties in a timely manner.
- ÇOK A.Ş. shall systematically identify all stakeholders relevant to the Project continuously. Project information shall be disclosed to affected communities timely and transparently. Communication with affected communities and other stakeholders shall be maintained in a meaningful way. All records of these communications shall be kept appropriately.
- ÇOK A.Ş. commits to provide both workers and affected communities a mechanism to express their grievances without fear of reprisal and ensure their concerns are appropriately addressed in a timely manner.

ÇANAKKALE OTOYOL VE KÖPRÜSÜ İNŞAAT YATIRIM VE İŞLETME A.Ş. (ÇOK A.Ş.)

• ÇOK A.Ş. respect internationally recognized human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization's Conventions on Fundamental Principles and Rights at Work. These include the rights of our Project workforce and those living in communities affected by our activities.

915 CANAKKALE

Security

- ÇOK A.Ş. shall provide security in a manner that does not jeopardize the community's safety and security, or the ÇOK A.Ş.'s relationship with the community.
- "Proportional Use of Force" philosophy shall be the main perspective of ÇOK A.Ş in terms of Security.
- Making a comprehensive investigation of past experiences of possible security firms and/or individuals during selection phase of security safeguard is committed by COK A.S.
- ÇOK A.Ş. shall assess security risks in accordance with culture of relevant community. Security personnel's behaviours that may increase communal tension shall not be allowed.
- Management of ÇOK A.Ş. shall report any unlawful act of any security personnel to the authorities under any circumstances.

On Behalf of Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş. (ÇOK A.Ş.)

Ø

Mustafa Tanrıverdi CEO