



ENKA
Engineering for a Better Future

SUPPLIER CODE OF CONDUCT





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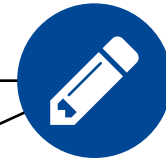
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Our Vision

To be one of the best and innovative engineering and construction companies serving globally.



Our Values

Behind every activity and project undertaken by ENKA, there are its corporate values which determine the way of doing business, support the business culture and vision and are adopted by all ENKA employees.

Trust: An open relationship with our employees based on mutual trust, respect and success.

Commitment: Uncompromising commitment to quality, health, safety and environment.

Solidarity: Sharing success and standing together in the face of failure.

Inclusivity: Involving stakeholders in our processes and decision-making mechanisms, not excluding any stakeholders on the grounds of discrimination or prejudice.

Integrity: Acting in compliance with relevant laws, regulations and internationally accepted ethical values in all of our operations without exception.



Our Mission

To design, build and deliver safe, high-quality and cost-effective construction projects on schedule for our customers while providing quality employment and career growth opportunities for ENKA employees.

Innovative Acumen: Excellence, innovation and improvement are our priorities.

Stewardship: Being aware of our responsibility throughout the management of all stages of our activities and fulfilling all requirements of this responsibility through the life span, including social, environmental and economic aspects.

Sustainability: A corporate sustainability approach that imparts awareness of economic, environmental and social responsibilities towards internal and external stakeholders.

Transparency: Adopting an explicit attitude regarding our decisions and activities that affect the environment, society and economy and ensuring honest and clear communication with stakeholders.



Introduction

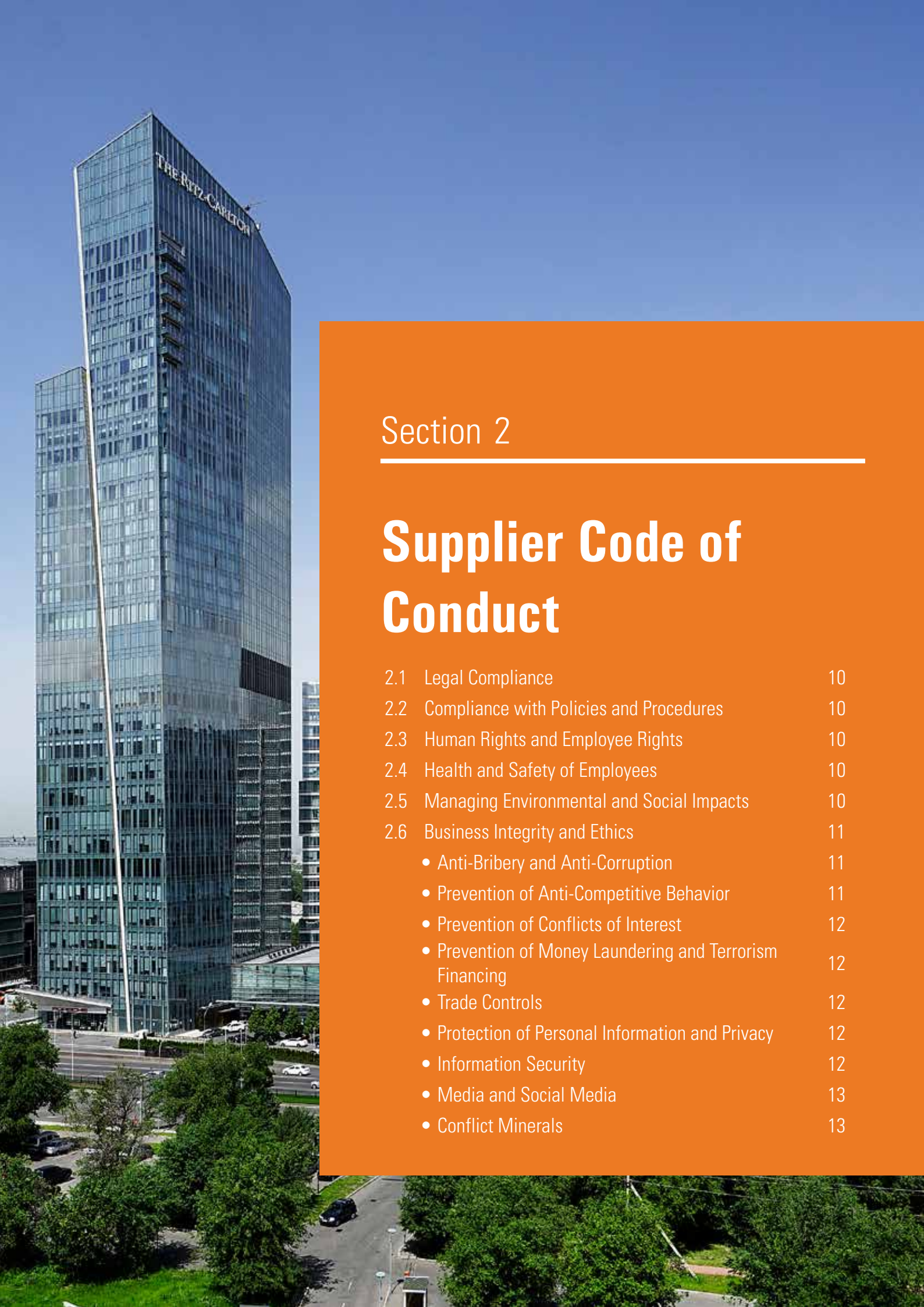
Section 1

Introduction

ENKA is determined to comply with the highest ethical standards in support of a sustainable future while carrying out the global projects it undertakes. ENKA is signatory to the United Nations Global Compact, and has made a commitment to act in accordance with the 10 principles defined in this framework.

ENKA aims to expand this commitment throughout its entire value chain. Accordingly, it expects the same sensitivity and care from all its suppliers, subcontractors, consultants, service providers, representatives and all other business partners (hereinafter referred to as “Suppliers”).

ENKA expects all its suppliers to comply with the 10 principles of the United Nations Global Compact, and the parts of the United Nations Universal Declaration of Human Rights, and the International Labor Organization (ILO) Declaration on the Fundamental Principles and Rights at Work, which concerns the business world. To this end, ENKA requires all its suppliers to comply with the rules set forth in the Supplier Code of Conduct. All suppliers establishing business relations with ENKA and its subsidiaries are responsible for ensuring their companies, employees, suppliers and subcontractors understand and act in accordance with these rules.



Section 2

Supplier Code of Conduct

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Supplier Code of Conduct

ENKA's suppliers commit to act, together with their employees, subcontractors and suppliers, in accordance with the rules set out below.

2.1. Legal Compliance

ENKA's suppliers are responsible for being aware of and complying with national and international laws, regulations and other official legislation applying to themselves and their business, and for fully complying with the contractual requirements signed with them.

2.2. Compliance with Policies and Procedures

ENKA's suppliers are obliged to adhere to all corporate and project-specific policies, procedures and plans related to their operations, especially those regarding to sustainability, occupational health, safety and environment (HSE), quality, information security and nuclear safety.

2.3. Human Rights and Employee Rights

ENKA carries out all its activities in accordance with human rights, and expects the same care from all parties with whom it does business. ENKA does not tolerate any violations of human rights that may occur during activities. Accordingly, ENKA demands that its suppliers:

- Do not employ child labor, and comply fully with the rules set by the International Labor Organization regarding the employment of young workers,
- Do not engage in any work practice contrary to human rights, including, but not limited to, unacceptable treatment such as forced or compulsory labor, unregistered labor, bonded labor, exploitation, corporal punishment, all kinds of modern slavery and human trafficking,
- Do not expose their employees to any form of discrimination (based on race, religion, language, color, gender, sexual orientation, disability, etc.),

- Do not apply or allow corporal punishment; mental, physical, sexual or verbal abuse, severe or insulting disciplinary behaviors or ill-treatment,
- Do not pay their employees below the minimum wage determined by law; and do determine a fair wage scale in relation to the current sectoral average for the salaries of their employees,
- Comply with the laws regarding working hours and employee rights in the country in which they operate,
- Respect the rights of its employees to form independent unions, to be a member of such unions and to organize.

2.4. Health and Safety of Employees

Suppliers are obliged to provide their employees with a work environment in which all precautions are taken in terms of occupational health and nuclear safety, where applicable. In this context, they shall take all necessary precautions and provide all the necessary equipment completely. All suppliers are obliged to comply fully with the procedures related to occupational health and nuclear safety at the facilities and construction sites operated by ENKA and its subsidiaries, and to take and comply with the necessary measures to prevent any incidents. In line with this, ENKA's suppliers;

- Shall train their employees in HSE matters and supervise them under all conditions.
- Shall make their best effort to contribute to ENKA's HSE and zero incident targets.
- Shall ensure that their employees have uninterrupted access to clean water, food and health services.
- Shall stop the work and inform the relevant ENKA unit when a situation that may pose a risk to an employee or the environment arises.
- Are responsible to provide a safe work environment for their employees, and take all necessary security measures in this respect.

Supplier Code of Conduct

2.5. Managing Environmental and Social Impacts

ENKA expects all its suppliers to comply with the laws, regulations and applicable international standards related to environmental protection and social accountability. In line with this, ENKA's suppliers shall;

- Take every precaution to avoid any harm to the environment.
- Obtain and maintain any necessary environmental and social permits, approvals or licenses necessary for their operations.
- Fulfill their responsibilities arising from ENKA's plans and procedures.
- Evaluate the environmental and social impacts of the work undertaken, and determine goals and actions to mitigate them.
- Strive to reduce the use of natural resources and pollution.
- Carry out studies to reduce their carbon and water footprints.
- Prefer environmentally friendly and sustainable practices as much as possible; and accordingly, comply with the relevant certification schemes (FSC, MSC) or ecological labels (ECO Label).
- Maintain an environmental management system that prioritizes the protection of natural life, fauna and flora, and endangered species.
- Identify the risks to the human rights from their activities on the local people, take the necessary measures to prevent human rights violations, determine communication channels for the reporting of possible violations and exercise with care in the resolution of such notifications.

2.6. Business Integrity and Ethics

In line with its responsible management approach, ENKA works to meet the legal requirements of the countries in which it operates and conducts robust Ethics and Compliance programs to ensure its legal compliance. In accordance with this program, ENKA expects its suppliers to ensure the same legal compliance and to take the necessary measures to maintain it.

Anti-Bribery and Anti-Corruption

ENKA prohibits all forms of bribery and corruption in its operations. ENKA suppliers shall not accept, give, demand bribes; and must refrain from any behavior that may raise suspicion of corruption, including facilitating payments and shall ensure that all payments they make or any gifts they give are in compliance with the law. ENKA expects that all its suppliers to maintain appropriate records and documents regarding the payments they make and establish the necessary control mechanisms within the company to prevent bribery and corruption.

Prevention of Anti-Competitive Behavior

ENKA promotes fair and strong competition in its operations and communicates with public authorities in the countries in which it operates in a transparent manner and in accordance with the fair competition laws in its countries of operation. In this context, ENKA suppliers shall:

- Act in accordance with the relevant competition laws of the country in which they are located.
- Avoid making improper deals with competitors, or engaging in a contact that could create a false impression.
- Avoid abusing their position in the markets in which they operate and avoid price fixing, bid rigging and similar behaviours that can have an adverse effect on competition.

Prevention of Conflicts of Interest

ENKA expects its suppliers to take the necessary measures to prevent conflicts of interest. In line with this, ENKA's suppliers shall:

- Ensure that the business decisions made by their employees during their work are in line with the interests of the company, rather than their own interests.
- Avoid situations that may result in a conflict of interest or situations that may create the appearance of a conflict of interest and take necessary measures.
- Inform ENKA in case of any personal interest that may arise from business relationships.
- Prevent its employees from offering gifts, invitations or other advantages to ENKA employees or other third parties by using their positions. This rule does not cover gifts or entertainment that have symbolic value, and that are in compliance with the law and the ENKA Code of Business Conduct.

Prevention of Money Laundering and Terrorism Financing

ENKA suppliers shall not directly or indirectly participate in money laundering or terrorism financing activities and shall take the necessary precautions accordingly.

Trade Controls

ENKA suppliers shall ensure that their transactions comply with the requirements of all export licenses and all applicable regulations. Suppliers who transport and/or use products subject to export and import controls or sanctions are responsible for understanding and following the relevant laws, regulations and company rules. Suppliers shall keep up and comply with the frequently changing sanctions, export restrictions, economic sanctions, boycotts and embargo laws.

Protection of Personal Information and Privacy

All suppliers are required to ensure that the personal data shared with them by ENKA due to their business relationship is processed and stored in accordance with the law, that the necessary security measures are taken, and that they comply with the principles, bases and procedures stipulated in all applicable data privacy legislation. To guarantee the protection of personal data, suppliers are obliged to accept and undertake certain contractual obligations relating to this item in the agreements to be signed with ENKA.

Information Security

If ENKA suppliers gain access to any confidential ENKA information, they shall be alerted and take the necessary precautions in advance to best protect ENKA's proprietary and confidential information, both during and outside work.

It is strictly forbidden for suppliers to use ENKA's confidential information for their own benefit or for the interests of individuals and institutions other than themselves.

Media and Social Media

Suppliers are expected to refrain from making any comments, sharing information or documents regarding ENKA, or that may be attributed to the company, in media channels and on social media, whether positive or negative. Suppliers shall not share any confidential or strategic information, documents or images, including ENKA's trade secrets, on their personal social media and network accounts; they must avoid statements and attitudes that disparage ENKA's services, customers, suppliers or competitors; and they must not respond to questions from the media or other institutions about ENKA or make any statements on behalf of ENKA. Suppliers shall consult with the Corporate Communications Department and obtain written approval before making any statements regarding the work they carry out with ENKA or its subsidiaries.

Supplier Code of Conduct

Conflict Minerals

As stated in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG), ENKA's suppliers shall ensure that they do not supply products containing minerals from conflict-affected areas that can result in direct or indirect financing or benefit to armed groups and cause human rights violations. Suppliers are expected to practice due diligence regarding their mineral supply chains according to the recommendations outlined in the OECD DDG.

Suppliers are responsible for taking the necessary measures to prevent the use of tantalum, tin, tungsten and gold, etc. which are sourced from conflict-affected or high risk areas and contribute to the financing of the conflict. In the event of suppliers sourcing minerals from conflict-affected or high-risk areas, they are expected to obtain these minerals only from audited, conflict-free smelting facilities and refineries. If a product or material contains conflict minerals, the supplier will be obliged to provide the necessary transparency of the entire supply chain, including industrial processing facilities, upon request.



Procedure to be Followed for Code Violations

Section 3

Procedure to be Followed for Code Violations

ENKA demands all its suppliers to understand the Supplier Code of Conduct and act in accordance with it. ENKA has the right to periodically request information and documents from its suppliers, and to carry out on-site or off-site audits in order to confirm compliance with the Supplier Code of Conduct. Suppliers also acknowledge ENKA's right to such demands and inspections.


ENKA may request information and documentation from its suppliers, and may conduct an audit, with or without notice, in order to monitor compliance with the rules set forth in this document upon witnessing a violation, or as a result of a valid notification. Suppliers are obliged to submit all relevant documents requested by ENKA within 2 days at the latest.

Suppliers are obliged to notify ENKA if they witness, become aware of or suspect a violation of the rules. Reporting a concern, violation or potential violation allows ENKA to detect potential or existing situation early and prevent it.

The ENKA Supplier shall ensure that it operates a fair grievance mechanism procedure that allows no retaliation and that its employees and suppliers can refer to in case of violation of the rules outlined in this document.

Suppliers may use the ENKA Ethics Hotline or e-mail address or contact ENKA's Supply Chain Management Department or Corporate Sustainability and Compliance Department to report cases or suspicions of violations regarding their activities related to ENKA or its subsidiaries.

ENKA Ethics Hotline Telephone Number:

 +90 (212) 376 10 10

ENKA Ethics E-mail Address:

 ethics@enka.com

The ENKA Ethics Hotline is accessible from Monday to Friday between **09:00** and **18:00**.

Reports can be made anonymously if desired and in the **Turkish, English, Russian** and **Kazakh** languages.

Procedure to be Followed for Code Violations

ENKA, under no circumstances, tolerates retaliation. It is strictly forbidden to retaliate against the employees of suppliers who make reports, who voice their concerns, who ask for support in a situation where they are in a dilemma, who cooperate in ongoing investigations and audits, and who refuse to participate in suspicious, inappropriate or unfair activities.

Suppliers are solely responsible for complying with the Supplier Code of Conduct, and in addition to the commitment set forth herein, are expected to obtain the same commitment from their suppliers and subcontractors.

ENKA reserves the right to unilaterally terminate the business relationship with any supplier which intentionally violates the behaviors specified in the Supplier Code of Conduct, and in case any non-compliance is detected during an audit. In addition, ENKA will maintain the right to demand the implementation of an action plan by suppliers to eliminate any non-compliance and to carry out follow-up audits to ensure that the actions stipulated in the action plan have been carried out.

ENKA may demand the suspension of any supplier employee who behaves illegally or inconsistent with the Code of Conduct, or terminate its cooperation with the supplier. Any violation of ENKA's rules related to human rights, anti-bribery and anti-corruption, and/or the Supplier Code of Conduct by any unit or sub-supplier of the supplier may result in the termination of the contract entered into with the supplier.

By entering a business relationship with ENKA, suppliers agree that ENKA reserves the right to unilaterally make changes to the ENKA Supplier Code of Conduct and acknowledge that they can access the Supplier Code of Conduct via the link below and they are committed to comply with the Supplier Code of Conduct.



www.enka.com/sustainability/home/ethics-compliance/



ENKA

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