



## Modern Slavery Act Statement 2023

This statement is made by ENKA İnşaat ve Sanayi A.Ş. on behalf of its UK business, ENKA Construction Limited, with company number 10527034, to the reporting requirements of Clause 54 of the UK Modern Slavery Act 2015. It covers the commitment and steps taken by ENKA (defined below) during the financial year ending 31<sup>st</sup> December 2022, to prevent human trafficking and modern slavery in ENKA's business and supply chain.

### Our Business and Supply Chain

ENKA is an engineering and construction company. The ENKA group parent company, ENKA İnşaat ve Sanayi A.Ş., has its headquarters in İstanbul, Turkey and along with its other affiliated companies, the group (referred to as "ENKA") has a global presence. ENKA has the collective experience gained from managing projects in 50 countries to date. Since 1957, ENKA has been providing comprehensive services in design and engineering, procurement, construction, commissioning, operation, maintenance and project management phases of all sorts of construction projects in Turkey and around the world with its human resources of more than 20,000.

ENKA with its subsidiaries provides services in four main areas; engineering & construction, power generation, real estate and trade. As a group, ENKA's global annual turnover in the financial year ending 31<sup>st</sup> December 2022 was 3.73 billion USD. To learn more about ENKA's business please click [here](#).

All of ENKA's activities and its relationships with all its stakeholders are grounded on a consistent business ethics approach which is based on ENKA's corporate values; trust, commitment, solidarity, inclusivity, integrity, innovative acumen, stewardship, sustainability and transparency. In line with its values, ENKA is committed to respecting human rights in all its operations and expects its business partners (including suppliers and subcontractors) to do the same.

ENKA operates in many different sectors together with its subsidiaries and therefore it has a diverse range of subcontractors and suppliers, comprising thousands of companies ranging from large and multinational companies to micro businesses in various countries delivering materials, equipment and services to projects worldwide.

### Our Commitment

ENKA is a signatory to the United Nations Global Compact and committed to comply with its ten principles, which include rejecting forced and compulsory labor along with other commitments about human rights, labor, environment and anti-corruption.

ENKA does not tolerate any form of human rights violations including modern slavery or human trafficking in any part of its business. ENKA's policies, including its [Sustainability Policy](#), ENKA Code of Business Conduct and ENKA Supplier Code of Conduct, are designed to outline this commitment and manage the risks relating to modern slavery and human trafficking issues.

ENKA communicates its rules, ethical values and form of governance to all employees through [ENKA Code of Business Conduct](#), which includes ENKA's commitment to ensuring that there is no form of modern slavery or human trafficking in any part of company's business. ENKA Code of Business Conduct is published in seven languages; English, Turkish, Russian, Arabic, Georgian, Serbian and Hindi and it is fully



applicable to all employees and managers at every level including senior management of ENKA and its subsidiaries.

ENKA employees are responsible for complying with ENKA's policies and Code of Business Conduct and violation of the Code may result in disciplinary action, up to and including termination. ENKA employees are also responsible for immediately reporting any concerns about any issue or suspicion of human rights violations including modern slavery or human trafficking to their supervisor, project manager, Corporate Sustainability and Compliance Department, or Legal Department.

ENKA's corporate policies and Codes are reviewed annually and updated if required.

## Our Structure

The Sustainability Committee, which is led by the ENKA's Chairman of the Board of Directors and reports results obtained from all operations to ENKA's senior management, is responsible for assessing economic, social (including human rights) and environmental risks and opportunities that may have an impact on ENKA's assets and trading activities, to monitor and analyse relevant sustainability issues, to identify the sustainability strategy and to undertake projects to realise goals. While ENKA's Chairman of the Board of Directors has the ultimate responsibility for ENKA's response to modern slavery, management and mitigation of modern slavery risks is managed by ENKA's Sustainability Committee.

## Risk Assessment and Management

All operations of ENKA are assessed to ensure that modern slavery does not exist in ENKA's activities and supply chain.

Our assessment is designed to establish and assess areas of potential risk in our business and supply chains, monitor those potential risks and take steps to reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Given the fields of activity of ENKA and its subsidiaries, the assessed risks include sustainability issues and risk management covers ethics and compliance, human rights, and anti-corruption. In the risk assessments, human rights risks were considered as significant risks regarding industry risks as well as geographic risks. Besides, some of the countries that ENKA operates in or supplies material from have higher risks of modern slavery due to governance systems or socio-economic factors.

### • Expectations from Supply Chain

ENKA has a [Supplier Code of Conduct](#), which states the minimum requirements and standards that ENKA expects from its suppliers and subcontractors regarding ethical business practices, social and environmental management. ENKA sets clear human rights and anti-slavery expectations for its supply chain and requires all its suppliers, subcontractors, consultants, dealers and business partners to comply with the ENKA Supplier Code of Conduct in all the activities they carry out. ENKA does not tolerate slavery and human trafficking within its supply chains.

As required by ENKA corporate procurement procedures, the Supplier Code of Conduct and the procedure to be followed in case of violations are communicated to suppliers before the contract is signed. The Supplier Code of Conduct is available on ENKA's corporate website in English, Turkish, Russian, Arabic, Serbian and Hindi.

## • Supplier & Subcontractor Selection

Any firm that wants to develop a business relationship with ENKA may register to the ENKA Global Vendor Network portal. The ENKA Global Vendor Network (EGVN) contains trade information of all suppliers, service providers, subcontractors and other third parties with which business relations have been established. Sustainability criteria including, commitment to ethical conduct and compliance with human rights, policies and procedures on preventing child labour, forced labour and modern slavery are among the supplier & subcontractor pre-qualification and performance evaluation criteria. For the supplier or subcontractor pre-qualification assessments, if the firm in question has previously done business with ENKA, its EGVN assessment scores and notes are checked and those firms which performed poorly or which violated the law, human rights, the rules for combating bribery and corruption or the ENKA Supplier Code of Conduct are not engaged. Also, no contracts are offered to suppliers whose assessment score is under the acceptable limit, and if any human rights violations or cases of bribery and corruption have been detected.

A risk-based due diligence or a restricted parties listing is performed to suppliers and subcontractors by project procurement teams. Once the supplier or subcontractor or business partner to collaborate is selected, ENKA's standard contract requires compliance with the Supplier Code of Conduct, thus no human rights violations including modern slavery. With these contracts all ENKA suppliers and subcontractors agree to comply with all applicable local laws and regulations, as well as Supplier Code of Conduct, reserving ENKA's rights to carry out audits in this regard and to terminate the business relationship should the Supplier Code of Conduct be violated, including over issues of human rights and combating bribery and corruption.

## • Monitoring Supplier Performance & Audits

ENKA adopts a proactive approach about its supplier relationships and maintains a frequent communication with its suppliers through its project procurement teams. ENKA also conducts regular visits to its suppliers, which are identified as critical considering the materials or services they provide.

Monitoring of supplier performance is among the most important criteria for a healthy functioning sustainable supply chain. ENKA runs evaluation systems on EGVN to measure its suppliers' operational, scheduling, cost, quality, occupational health and safety, environmental, ethical and sustainability performance by covering topics such as compliance with human rights and ENKA Supplier Code of Conduct and commitment to anti-slavery.

In addition to the performance evaluations, suppliers that have strategic importance for ENKA are audited through the Supplier Sustainability Audits covering compliance with human rights including modern slavery and human trafficking issues. In the light of these audits, the areas that need to be improved are identified and the necessary corrective and sustainable action plans are prepared and implemented by suppliers.

## • Internal Audits

ENKA projects and subsidiaries are audited at regular intervals by the experienced internal audit teams. As part of the routine internal audits, ENKA began to conduct Ethics and Compliance audits at its projects and subsidiaries as of 2019 mainly covering human rights, employee rights and combating bribery, corruption issues and the compliance with the ENKA Code of Business Conduct. With the Ethics and



Compliance audits, ENKA is working towards identifying these human rights and modern slavery risks as early as possible and eliminate them.

### Training and Awareness

In addressing the human rights issues that represent high risks according to the above assessment, ENKA has initially paid considerable attention to training. In order to ensure that all of its employees act in compliance with ENKA's understanding of ethics, human rights issues covering child labour, forced labour, human trafficking as well as combating bribery and corruption from their first day as ENKA has made the Code of Business Conduct a part of the orientation training for new employees. Apart from the orientation training, the ENKA Code of Business Conduct and Human Rights online training was prepared for all ENKA employees to ensure that they clearly understand ENKA's ethics and compliance management, its antibribery and anti-corruption policy, human rights approach and modern slavery policies. This training is provided to local employees in their own language with the support of subtitles in the local languages or an interpreter in countries where the training is delivered. In addition to employees of ENKA and its subsidiaries, employees of ENKA's subcontractors and business partners also participated in the Code of Business Conduct and Human Rights training which clearly communicates ENKA's human rights approach.

With respect to human trafficking, which is found as a high-risk issue regarding ENKA's human rights assessment, "Human Trafficking Awareness Training" was developed and provided to employees in regions where the risk is identified as high.

Data of the trainings provided to employees are shared every year in ENKA's Annual Sustainability Report in detail.

### Reporting Violations

ENKA encourages its all employees, suppliers, subcontractors and other business partners to report any issues, concerns or suspicions of human rights issues, including modern slavery or human trafficking. Therefore, ENKA maintains reporting mechanisms to ensure open and transparent communication and make it possible for employees, suppliers, local communities, and all parties engaged in a business relationship to be able to report behaviour that violates the Code of Business Conduct or company policies and to receive advice for matters that are unclear to them. ENKA has its Ethics Hotline available as a confidential resource by phone (+90 (212) 376 10 10) or by e-mail address ([ethics@enka.com](mailto:ethics@enka.com)).

In addition to the Ethics Hotline, grievance mechanisms are established at ENKA projects to allow employees and local communities to issue reports. All complaints submitted to these grievance mechanisms are handled within the framework of corporate procedures.

Any news, updates, progress about ENKA's policies and applications and any violations on human rights, forced labour, modern slavery or child labour and important outcomes of the routine controls and audits carried out by ENKA are publicly shared through ENKA's Annual Sustainability Report.



ENKA will continue to monitor and improve its actions against modern slavery and human trafficking.  
This statement has been reviewed and approved by ENKA's Board of Directors on 10 April 2023.

A handwritten signature in black ink, appearing to read 'M. Tara', is positioned above the name.

Mehmet Tara, Chairman of the Board and President

For and on behalf of ENKA İnşaat ve Sanayi A.Ş. and the ENKA Group.