

THE QUALITY, ENVIRONMENT, OHS AND ANTI-CORRUPTION POLICY OF MAPA GROUP & GÜNAL / MAPA CONSTRUCTION

1. GOODWILL AND REPUTATION OF OUR COMPANY WILL BE MAINTAINED and ENHANCED.

As Günal / Mapa Construction, our works will be performed on time, the first time and correctly, without compromising the understanding of quality, with an aim to maintain and enhance our reputation gained to date regarding our services in construction and undertakings in infrastructure and superstructure. The needs and expectations of customers will be determined and fulfilled at the highest level. Our primary commitment is to prevent injury and impairment of health, and to ensure continuous improvement by complying with the conditions of Quality, Environment and OHS Management Systems.

2. TECHNOLOGICAL DEVELOPMENTS WILL BE FOLLOWED UP

Developments in technology for Quality, Environment and OHS practices will be followed up to raise the quality level and efficiency, and it will be ensured that employees will be provided with the necessary training and our Integrated Management System will be continuously improved.

3. PARTICIPATION OF ALL EMPLOYEES WILL BE ENSURED

Importance will be attached to teamwork to develop Quality, Environment and OHS practices. Our subcontractors will be supervised and their participation in teamwork will be ensured. All employees are responsible for the safe working of both themselves and others.

4. THE ENVIRONMENT WILL BE PROTECTED AND COMPLIANCE WITH LEGISLATIONS ENSURED

Measures will be taken to minimize the impacts that may harm the environment during the planning of the works and manufacturing at the construction site. An effective Environmental and OHS awareness will be created by preventing pollution. All work will be carried out in accordance with the Quality, Environment, OHS legislations and other sector related conditions.

5. ENVIRONMENT AND WORK SAFETY OUR FIRST PRIORITY

No work can be so urgent and important that it endangers the environment and human health. Environment and employee safety will always be ensured.

No accident is inevitable. Our employees should believe that environmental and work accidents can be prevented.

6. ANTI-BRIBERY AND ANTI-CORRUPTION

Günal / Mapa Construction acts with an understanding of "zero tolerance" against corruption in all of its activities, and complies with the laws and other regulations, universal rules of law, and ethical and professional principles covering the acts of corruption. Günal / Mapa Construction Board members, employees, and all third parties acting on behalf of the holding companies must avoid all types of behaviour and acts that may put Günal/ Mapa Construction under suspicion within the scope of corruption. Regardless of the public or private sector, it is forbidden to receive or provide any cash/non-cash benefits that may possibly be considered corruption.

7. COMPLIANCE WITH REGULATORY REQUIREMENTS AND ETHICAL RULES

Our employees are obliged to act in accordance with all laws, rules and regulations, and are also obliged to comply with ethical rules.

8. PREVENTING CONFLICTS OF INTEREST

It is forbidden for a Günal/ Mapa Construction employee, his/her family or a relative to gain personal benefit by taking advantage of the employee's position within the company, and to establish close relations with persons or organizations that can benefit from the business decisions s/he will make or confidential

information s/he owns. During their duties, employees must protect the company's benefits, and avoid any acts and behaviour that may be construed as providing benefits to themselves or their relatives. No employee, including the Board of Directors, may personally benefit from company operations in favour of their family members or any relatives, may not use company property, information, use positions for personal interests or engage in any competition with the company.

9. ETHICAL PRINCIPLES

Unethical behaviour, aggressive attitude, threatening speech and behaviour patterns disrupting the productivity and trust of the working environment; harassment and abuse; as well as making promotions for commercial, political or religious purposes are unacceptable.

VICE PRESIDENT

A handwritten signature in blue ink, consisting of a large, stylized initial 'A' followed by a surname that appears to be 'Carter'.