



HUMAN RESOURCES POLICY

ERG's Commitment

ERG Otoyol Yatırım İşletme A.Ş. ("ERG") aims to be the first choice of employees and to be a respected leader in the road construction & operation industry. ERG's mission is to conduct its operations in a sustainable manner and recognizes that its employees are the resource fundamental to achieving its business strategy. ERG believes that the same qualities of leadership that result in sound Health and Safety, Environment, Social and Human Resources Policies, are the qualities that result in an efficient company.

ERG's Human Resources Policy

ERG believes that its employees are the key resources in meeting its vision of being a respected constructor and operator of motorway projects. ERG will incorporate the values of teamwork, integrity, honesty, respect and empowerment in the execution of its Human Resources Policy.

ERG aims to be in a good relation with the communities and other parties where it operates and supports the sustainable development of the communities with the provision of training of local applicants which close to the companies' operations. Selection of the employees will be made by their safety approach, professional behaviour and performance. Company's recruitment policy gives priority for workforce development in the region, starting from the project influence area and then followed by other surrounding areas.

ERG supports human rights consistent with the United Nations Declarations on Human Rights.

Objectives

- To promote safe and healthy working conditions, and the health of workers;
- To promote the fair treatment, non – discrimination and equal opportunity of workers, regardless of gender, race, nationality, religion or disability;
- To ensure compliance with national labour law and associated regulations;
- To protect workers, including vulnerable categories of workers such as migrant workers and workers engaged by third parties;
- To never permit to use of forced or child labour;
- To implement its Human Resources policy and procedures in a fair, open and transparent manner;
- To implement a philosophy of rewarding performance; and
- To ensure everyone who works for company, its contractors, subcontractors or suppliers have right to privacy.

Compliance

ERG will comply with all relevant national legislations relating to employment and human resource considerations. ERG will also adhere to the standards and guidelines of International Finance Corporation, as well as the International Labour Organization and United Nations.

This Human Resources Policy applies to all workers directly engaged by ERG, workers engaged through third parties (including workers who work for firms in supply chain) to perform work related to ERG's core business of the project for any substantial duration (contracted workers).

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Continuous Improvement

This Policy will be implemented through company's integrated Environmental & Social Management System which will be regularly reviewed and updated by periodic, systematic internal audits.

Company Practices

Good management requires that all employees know what to do, how well they are performing and what they need to learn in order to do a better job. To achieve this, Company will set clear performance targets and expectations, based on clear job descriptions which includes ERG's expectations regarding work ethics, code of conduct. Company will ensure that employees get objective feedback on their performance and develop personal development plans so as to drive more effective individual behaviour and enhance the Company's performance.

ERG will provide workers with documented information that is clear and understandable, regarding their rights under national labour law and any applicable collective agreements, including their rights related to hours of work, overtime, compensation and benefits. These will be updated when any material change occurs.

ERG will ensure that employees have the necessary knowledge and skills required to complete their tasks effectively and efficiently. Learning, training and development activities will be provided by ERG to improve employee competency level and organizational performance.

ERG will seek to recruit committed, motivated and qualified employees to enable Company to achieve its goals. ERG will develop a human resources plan that describes how we will meet our current and future HR requirements.

Occupational Health and Safety

ERG is committed to the implementation of its Occupational Health and Safety Policy, and to ensuring that this policy is made known to all its managers, staff, contractors, subcontractors and partners, and is proactively implemented, reviewed and updated. We will provide a safe and healthy work environment, taking into account inherent risks involved with the activities, including physical, chemical and biological hazards.

Non – Discrimination and Equal Opportunity

ERG will make employment decisions only based on inherent job requirements. Employment will be based on the principle of equal opportunity and fair treatment, and will not discriminate with respect to any aspects of the employment relationship, such as recruitment and hiring, working conditions, access to training, compensation, terms of employment, promotion, termination of employment or retirement and disciplinary practices. Company will take measures to prevent and address harassment, intimidation and / or exploitation, especially in regard to women. These principles of non – discrimination apply to all workers, including to migrant workers.

Retrenchment

In the event of any requirement of collective dismissals, ERG will carry out an analysis of alternatives to retrenchment. If there are no alternatives, a retrenchment plan will be developed and implemented to reduce the adverse effects on workers. This Plan will be based on principles of HR Policy.

Grievance

ERG will provide a grievance mechanism for workers to raise workplace concerns. ERG will ensure that all workers including contracted workers are informed about the mechanism at the time of recruitment and trained about how the mechanism works. The process will aim to address any concern/grievance promptly, using an understandable and transparent process, without any retribution. The mechanism

will allow anonymous complaints to be raised and addressed, without impeding access to other judicial or administrative remedies that might be available. ERG will keep the grievance mechanism effective throughout its construction and operation period.

Protecting the Work Force

ERG will not employ any child labor or forced labour. ERG will employ only those who are legally entitled to work in the host country.

To protect the work force, the Company will make all commercially reasonable efforts to ascertain that the third parties and suppliers who engage contract workers are reputable and legitimate enterprises and have appropriate systems in place to ensure they operate in a manner consistent with the requirements of the policy.

Workers' Organizations

ERG recognises the rights of the employees to form and to join any workers' organizations of their choosing, without any interference, have the right to bargain collectively. ERG does not restrict employees from developing mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment, without interference from the Company.

CEO of the Company is going to be responsible on conformance of the Policy and its execution.

This policy was approved by the Board of Directors on 11th of June 2018.

