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1. OUR MISSION and VISION

Avrasya Tüneli İşletme İnşaat ve Yatırım A.Ş. (“ATAŞ”) was appointed for performance and operation work of Eurasia Tunnel Project (“Project”), which connects two continents under the sea floor, pursuant to the Law No. 3996 on the Performance of Some Investments and Services under the Build-Operate-Transfer Model and founded to engage in activities for this appointment.

As ATAŞ, our mission is “to provide safe, fast and comfortable transportation that connects the continents with smart and environmentally friendly solutions”.


As ATAŞ, our vision is “To continuously increase our contribution to the country’s economy and society with our innovative and sustainable applications and to be a global pioneer in tunnel operations.”

2. OUR VALUES

- **RELIABILITY**
- **SUSTAINABILITY**
- **VALUE CREATION**
- **INNOVATION**
- **TOGETHERNESS:**
- **SOLUTION ORIENTEDNESS**

In line with our values, as ATAŞ,

- We provide high-quality service to our employees, customers, society and business partners by keeping a commitment to ethical principles above all else.
- We talk with data and make decisions based on data.
- While fulfilling our responsibilities with care in accordance with international standards, we obtain results beyond expectations.
- We’re a preferred brand with the unique experience we deliver to our users during safe passage.
- We provide uninterrupted service with superior quality standards and an environment-friendly understanding.
- We increase productivity by integrating sustainability into our strategy, organization and processes.
- By not compromising on quality service standards, we ensure continuous growth and satisfaction of our user volume and sustainability of loyalty.
- We create value for all our stakeholders, including our customers, business partners, employees, and society.

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- We make life easier for our users by ensuring safe and comfortable passage. We care about our employees with our human-oriented approach.
- We take pride in adding value to the Turkish economy and people.
- We lead the sector by breaking new ground with an innovative approach we introduce to construction, operation and maintenance processes.
- We integrate technical and technological innovations, creating value in our operation and permanently improving.
- We enhance operational efficiency by encouraging creativity, adopting innovative ideas and continuous improvement.
- We do great work with a small team.
- We listen with empathy and respect diversity.
- We work with a strong team spirit and make it together. We appreciate each other and improve through feedback.
- We respond to any problems by acting agile while providing uninterrupted service.
- We make strategic plans about how to behave and how to do our business in order to adapt to changing conditions.
- We make situational analyses by combining strong communication and planned work with solution-orientedness.


3. OUR ETHICAL PRINCIPLES

3.1. Respect for Human Rights

We act in accordance with the United Nations Global Compact, which is considered an important reference in creating common universal grounds regarding ethics and values.

In conclusion, as ATAŞ, we:

- Value and respect human rights and the honour and reputation of all our employees. Respect the protection of human rights in our areas of influence.
- Work without causing violations of human rights.
- Create ATAŞ internal regulations and governance processes in accordance with our human rights policies.
- Adopt and respect freedom of organisation, the rights of collective bargaining and collective labor agreements.
- Do not allow child labor.
- Fight against all kinds of physical, sexual or psychological harassment, abuse and violence, and we have no tolerance for such behaviors and any form of unequal treatment, discrimination, violence or abuse.
- Take care to provide our employees with a working environment that embraces equality and diversity.
- Avoid discrimination during recruitment and in the work environment. Avoid discrimination based on gender, language, religion, race, age, nationality, or personal beliefs. We fight with all types of discrimination that may occur for these reasons.
- Make employment decisions by paying attention to factors such as qualifications, performance, merit and experience, and we attach importance to the principle of equality. We set our strategies according to these purposes and principles.

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- Respect the privacy and personal spaces of our employees.
- Provide a comfortable, healthy and safe work environment to our employees and do not allow them to work under pressure.
- Lead our employees to work towards common goals and encourage cooperation among employees.
- Attach importance to our employees' ideas, obtain ideas and opinions of our employees while making a decision as ATAŞ. We encourage our employees to think in different ways, be open-minded, and support their creativity.

As ATAŞ, we encourage all our stakeholders, employees, and business partners to comply with and respect human rights and act in accordance with basic principles set out in ATAŞ Ethical Principles.

3.2. Legality

As ATAŞ, we act with the basic principle that our employees comply with national and international rules of law and legislation, international conventions, and all agreements to which we're a party, including but not limited to those to which we're a party regarding the Project.

As ATAŞ, we maintain our records in accordance with law and legislation during the operation of the Project and in all our other activities.

As ATAŞ, we do our best and take necessary actions to ensure that all our employees and our agents of all kinds observe law, legislation, our policies and procedures, ethical principles and values.

3.3. Engineering Standards and Quality Service

As ATAŞ, a company assigned to construct and operate a project connecting two continents below the sea floor through a road tunnel, we act with superior engineering abilities as from the start of the Project.

We perform our activities in compliance with superior quality and engineering standards in accordance with national and international standards.

We care about safe passage and user satisfaction, work to continue our activities as a preferred brand.


We act in order to add value to our users and Turkish economy, we lead the sector by breaking new ground with an innovative approach we introduce to construction, operation and maintenance processes.

We keep track of any and all technical and technological developments within the scope of engineering standards and aim to comply with such innovations in our activities.

3.4. Integrity in Financial Records and Reporting

As ATAŞ, we issue all financial statements reports in accordance with statutory legislation, national and international standards and the Company's contractual obligations.

We act in line with our principles of fairness and integrity for reputation and reliability of ATAŞ.

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We exercise care in making sure that business and financial transaction documents reflect actual status, in recording and reporting the same and retaining them safely far from damage.

We exhibit a transparent approach to regulatory institutions and organizations. We disclose any and all information which is not a commercial secret timely in a complete, proper and understandable manner upon request and/or where it's necessary under statutory regulations.

3.5. Laundering of Crime Revenues, Financing of Terrorism, Anti-bribery and Anti-corruption

As ATAŞ, we fight bribery and corruption in every sense, laundering of crime revenues, financing of terrorism and similar crimes as basic principles in line with the statutory provisions and act in accordance with such purpose in all our acts and deeds.

We make necessary checks and take action in order to prevent bribery and corruption under national and international statutory provisions.

We take care that neither our suppliers nor our subcontractors, consultants, employees or any companies with which we may work together in any manner have been included in national and international banned lists.

As ATAŞ, we do not make any payment for any illegal or unethical transaction nor make any offer with similar material value pursuant to our practices and procedures, we do not engage in any act that may be deemed as bribery or corruption in the area of activity or line of work in order to derive benefits.

It's forbidden that any persons or entities with which ATAŞ deals make direct payments to an ATAŞ employee, offer any bribes, aids, donations, entertainment and similar things to him and/or that the employee accepts such offers.

3.6. Avoiding Conflicts of Interest

As ATAŞ, we, together with all our employees, do not derive personal benefits by using ATAŞ's name, our positions and titles at ATAŞ, ATAŞ's resources, business partners or business relations.


As ATAŞ, we take care that we are not in a situation that will provide interest to us or our relatives and that will make it difficult to be objective. We provide necessary means to enable reporting of such a situation or any situation that may be deemed as conflict of interest to the reporting line designated by ATAŞ.

We have necessary awareness to avoid conflict of interest and exercise maximum care.

3.7. Confidentiality and Protection of Information

As ATAŞ, we take confidentiality and information security as the basis and care about them.

As ATAŞ, we act with the awareness that any information, financial and commercial secrets we have acquired due to our business or access, including those related to the Project or persons and entities

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with which we deal or to the companies in the group of companies with which ATAŞ is affiliated, are within the scope of confidentiality obligation, and we protect such information.

We use any information we have acquired only for the requirements of our business and our duty. We do not disclose such information to third parties other than the officers who need to know such information and except for the situations required by business.

We exercise maximum care on the subject of protection of and keeping confidential third party information related to our operation and business activities. We act in accordance with the respective legislation on the protection of personal data and exercise care in protecting personal data under our policies and procedures regarding the protection of personal data. We also warn our suppliers, consultants, and subcontractors to take necessary precautions to protect third-party information and personal data per the statutory requirements and establish our business relations according to such terms.

We protect any information we learn during our business relationship with ATA and avoid disclosing it to third parties, even if our business relationship with ATAŞ has terminated.

We comply with the respective legislation on the protection of intellectual and industrial property rights. We avoid any act in breach of any copyright and act with the awareness of protecting intellectual and industrial property rights while performing our assignments.

3.8. Compliance with the Legislation on the Protection of Competition

As ATAŞ, we care about fair and open competition and avoid any activity that may be in breach of the legislation on protection of competition. We take care to ensure that all our employees and stakeholders act in accordance with the legislation on the protection of competition.

3.9. Stakeholder Relationships


As ATAŞ, we adopt equal, fair and honest behaviors in our relations with all our stakeholders, including our shareholders, suppliers, contractors, business partners and users.

We aim to establish transparent and effective communication with our stakeholders, consult them to receive their ideas and opinions and show solution-oriented behaviors. We provide prompt flow of information to persons, institutions and organizations where necessary.

We establish open and accessible communication channels in order to respond to concerns, recommendations and/or complaints of our stakeholders. We utilize all means to timely and effectively communicate with our stakeholders.

We perform improvement work in line with the feedback received from our stakeholders. We set targets for improvement on subjects with low rates of satisfaction and monitor the achievement of such targets.

We make multiple analyses, make decisions on the basis of data and maintain our activities by seeking efficiency in order to secure the trust of our stakeholders in ATAŞ.

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3.10. Healthy and Safe Work Environment

As ATAŞ, we care about ensuring that all our employees work in a healthy, safe and comfortable environment.

We give priority to human life. Accordingly, we respect all legal regulations related to occupational health and safety and provide suitable environments to our employees.

We organize events and trainings in order to increase awareness about occupational health and safety. We encourage our employees for their professional and personal developments, organize trainings and provide a suitable environment for their development.

We do our best and take necessary actions to ensure that our employees work in such a way as not to risk occupational health and safety, take all precautions, observe the rules and procedures we have specified on this subject.

3.11. Protection of Corporate Brand Identity

As ATAŞ, we avoid using the company name and logo in media and situations that may cause harm to the company's reputation. It's essential that, as ATAŞ, all our employees use the company logo and name in accordance with the "Eurasia Tunnel Corporate Identity Guide" we have issued and avoid any practices contrary to this corporate identity in any media. We avoid publicly disclosing our personal opinions, and where it's necessary to give information to the public, only authorized employees of the company give statements on behalf of the company.

We make sure that our social and traditional media posts always observe legal regulations and ATAŞ Ethical Principles and use the same in accordance with the Project's brand and reputation. We aim to provide correct and reliable information about the Project to our stakeholders through such channels.

We know that personal social media accounts are everyone's private area and respect those social media posts accordingly. However, we expect our employees to avoid posting information and photos that may violate third parties' and our company's confidentiality rules, as well as our ethical principles while posting materials on social media.

3.12. Respect for Environment

As ATAŞ, we conduct all our operations in an environmentally-friendly manner pursuant to the "Environmental and Social Governance and Action Plan" and perform our activities without causing harm to the environment with the awareness of using the resources in the most efficient and sustainable way and protecting nature.

We follow all national and international legal regulations about the environment and the obligations in the conventions to which we're a party.

We generate solutions in order to develop environmental performance, being aware that limited resources should be used sensibly and responsibly. With this awareness, we keep track of technological developments and give priority to using environmentally-friendly technologies.

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We organize events and trainings in order to increase environmental awareness. We exercise care in using environmentally- and nature- friendly sustainable products.

We aim to increase stakeholder satisfaction with our approaches sensitive to the environment and sustainability policies.

We work to increase the production and use of renewable energy, minimize carbon emissions, water consumption and waste and increase recycling.

3.13. Social Responsibility and Creating Social Values

We work with the awareness of “Creating Value”, one of ATAŞ’s values and place emphasis on social responsibility activities.

We make effort to maintain the confidence we have given to the society and our stakeholders and push our limits. We do our best to add value to country economy and people.

We support cultural and scientific activities, organize events to that effect and encourage our employees.

4. UNETHICAL TRANSACTIONS AND NOTICES

All ATAŞ employees are liable to adopt, act in accordance to and avoid engaging in any acts and behaviors contrary to ATAŞ’s values, these Ethical Principles and all ATAŞ procedures and instructions prepared on this issue.

The Ethics Committee established by ATAŞ is responsible for effective management of studies required to ensure acting in accordance to and practice of Ethical Principles. Ethics Committee’s operational principles and code of practice have been set through the procedures for the company.

It’s essential that if as ATAŞ, our employees and stakeholders become suspicious about ATAŞ Ethical Principles or learn anything in violation of such principles, they report this situation to the independent reporting line notified by ATAŞ. ATAŞ protects the people who report to this line, and within this scope, works with independent third parties to operate this line. Those reporting to this line shall not be disclosed. Except for intentionally false statements, ATAŞ does not retaliate against any employee or stakeholder or take any counter-action for any notifications made within this scope.

Any transactions contrary to Ethical Principles shall be reviewed in accordance with ATAŞ's Disciplinary Procedure and other applicable procedures and rules, and necessary sanctions shall be imposed. Violation of ATAŞ Ethical Principles may result in the imposition of serious sanctions including initiation of legal proceedings about the violator, termination of employment contract.

5. EFFECTIVE DATE AND UPDATE OF ETHICAL PRINCIPLES

These ATAŞ Ethical Principles were adopted by ATAŞ on the effective date stated above and entered into force as of this date.

These ATAŞ Ethical Principles may be revised or amended after the effective date if any need is

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identified but the employee shall be bound by the rules of ATAŞ Ethical Principles until such amendment is announced by ATAŞ. The updated version of ATAŞ Ethical Principles is made available to all employees, stakeholders and the public in Turkish and English on the ATAŞ website and in the internal documentation system.