

	Stakeholder Engagement Policy	Effective Date:	31.12.2024
		Revision Date:	-
		Revision No:	0

1. PURPOSE and SCOPE

Developing a sustainable business model and ensuring stakeholder engagement for its social interest are some of the most fundamental values of ATAŞ. This stakeholder engagement policy ("Policy") includes ATAŞ's and its stakeholder' commitments to perform their activities in accordance with ATAŞ Ethical Principles and values during their business operations and activities.

This policy covers all ATAŞ employees, directors and stakeholders.

This Policy constitutes an integrity with ATAŞ Ethical Principles, values and work culture.

2. DEFINITIONS

- **ATAŞ or Company:** Avrasya Tüneli İşletme İnşaat ve Yatırım A.Ş.
- **ATAŞ Ethics Line:** Independent reporting line for reporting violations, irregularities or suspicions regarding ATAŞ Ethical Principles (E-mail: avrasyatuneli@speak-hub.com, Telephone: 02128006588)
- **ATAŞ Ethical Principles:** Ethical principles with which ATAŞ, its employees and stakeholders are required to comply, specified by the document entitled Ethical Principles / Code of Conduct issued by ATAŞ
- **Stakeholder:** All the stakeholders in relationship with ATAŞ, including ATAŞ's shareholders, suppliers, contractors, business partners, consultants, employees, users, visitors, media, public institutions and organizations and other authorities
- **Top Management:** CEO (General Manager), CFO (Deputy General Manager), CTO (Deputy General Manager) or management personnel to be designated by ATAŞ's board of directors from time to time

3. PRINCIPLES AND UNDERTAKINGS

ATAŞ:

- ◇ adopts equal, honest and fair behaviors during its relationships with all stakeholders.
- ◇ avoids any behavior against equal treatment due to race, color, ethnicity, gender, language, religion, creed, nationality, age, marital status, economic and social status, disability, pregnancy, sexual orientation, political opinion, belief and similar factors towards all its stakeholders and acts with zero discrimination strategy.
- ◇ aims to develop a business model that can create sustainable values on common grounds for all its stakeholders.
- ◇ cares about establishing transparent and effective communication with its stakeholders. utilizes all means to timely and effectively communicate with its stakeholders.
- ◇ aims to show solution-oriented behaviors by consulting stakeholders to receive their ideas and opinions.

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- ◇ provides necessary resources in order to establish balanced relationships by considering the expectations of the stakeholders.
- ◇ establishes open and accessible communication channels in order to respond to concerns, recommendations and/or complaints of its stakeholders.
- ◇ cares about feedback received from its stakeholders and performs improvement works in line with them.
- ◇ makes multiple analyses, take decisions on the basis of data and maintains its activities by seeking efficiency in order to secure trust of its stakeholders in ATAŞ.
- ◇ encourages its stakeholders to take a role in protection of the environment.
- ◇ aims to develop mechanisms encouraging cooperation with stakeholders for them to improve themselves towards sustainable development.
- ◇ monitors and evaluates environmental and social risks in its activities and takes the necessary measures to reduce these risks.
- ◇ encourages respect for human rights in all stakeholder relations and expects all its stakeholders, including its suppliers, to act in accordance with human rights.

4. LETTER OF UNDERTAKING

ATAŞ requests its stakeholders to submit a letter of undertaking that they are familiar with and adopt all ethical principles in accordance with this policy. The respective stakeholder is expected to agree and undertake to act in accordance with the above-mentioned principles and commitments in general under the letter of undertaking. ATAŞ may request certain stakeholders to submit this letter of undertaking in writing under certain conditions.

Regarding such letter of undertaking, ATAŞ employees apply the “Stakeholder Engagement Letter of Undertaking Procedure” issued by ATAŞ.

5. AUTHORITY AND RESPONSIBILITY

All ATAŞ employees, including Top Management, must comply with this Policy.

All ATAŞ employees are responsible for ensuring that the Company's procedures and practices comply with this Policy and avoiding any activities and practices that are contrary to the principles and commitments of this Policy.

ATAŞ expects and demands that all its stakeholders, including its suppliers, act in compliance with the principles and commitments set forth in this Policy.

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ATAŞ undertakes that this Policy is binding for all business processes in which it operates and that it will act in accordance with this Policy.

6. AGAINST VIOLATIONS

You should report any acts or actions you think are violating this Policy to **ATAŞ Ethics Line**. All applications to ATAŞ Ethics Line, including suspected violations, will be reviewed confidentially and with great care in accordance with ATAŞ's policies, procedures and operational rules.

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.

Violation of this Policy by an employee may result in disciplinary action up to and including termination of employment. In the event that any stakeholder expected to act in accordance with this Policy acts in violation of this Policy, this may result in termination of the business relationship with ATAŞ or termination of relevant contracts.

7. EFFECTIVE DATE and APPLICATION

This Policy was adopted by Top Management on the effective date stated above and entered into force as of this date. ATAŞ may revise or amend this Policy after its effective date if any need is identified.

ATAŞ employees may consult Human and Culture Department for any questions related to application of this Policy.

ATAŞ regularly reviews and reports its commitments, efforts and declarations within the scope of this Policy as part of its periodic sustainability report.

This Policy is available to all employees, stakeholders and the public in Turkish and English on the ATAŞ website and the internal documentation system.