

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT (MSS)

(FOR PERIOD 01.01.22 – 31.12.22)

INTRODUCTION

Gülermak's Modern Slavery and Human Trafficking Statement (the "Modern Slavery Statement" or "Statement") is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the "Act") by the Executive Board of Gülermak and signed by Chairman of Executive Board Mustafa Tuncer, on 11th May 2022. The statement will be revised annually.

Over and above the requirements of the Modern Slavery Act, we endorse the tenets of the Global Compact principles, International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the Ethical Trading Initiative 'Base Code'.

We ensure that employment is chosen freely, payment and promotions are made centred on merit alone, freedom of association is respected, working conditions are safe and hygienic, child labour is not used, wages are not lower than the minimum wage, working hours are not excessive, no discrimination is practised, regular employment is provided, and no harsh or inhumane treatment is allowed.

OUR COMMITMENT

We are committed to improving people's lives by creating a connected and sustainable infrastructure that allows both people and the planet to thrive. We strategically focus on people, the planet, and this drives our performance.

Gülermak is committed to preventing and mitigating exploitation, bribery, and corruption. We are committed to prioritising the safety of the public and our workforce while ensuring that our business, and those businesses within our supply chains worldwide, work to our highest ethical standards. We are committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

We do not enter into business with any organisation, globally, which supports or is found to be involved in slavery, servitude and forced or compulsory labour. At all times, we prioritise the safety and wellbeing of our staff, partners, and communities in which we work.

ORGANISATION STRUCTURE

Gülermak Heavy Industry Construction and Contracting Co. Inc. ("Gülermak"), a leading engineering and construction company with over 60 years of experience. Gülermak is headquartered in Turkey, with local offices serving several jurisdictions worldwide including the UK, Europe, the Middle East and India. Gülermak employs over 10,000 people globally with experience in delivering high value and complex infrastructure projects across a range of international markets, covering more than 1,200km of railway, 260 km of tunnels, 200 railway stations, high-speed maintenance depots, and other key rail infrastructure. Examples include the Warsaw Metro Line II, Ankara High Speed Train Depot and Maintenance Complex, and Route 2020 of the Dubai Metro.

The company's operations are defined in our formal ISO certification as:

Organization and management of construction and contracting activities



As an owner-managed business, Gülermak maintains a business ethos based on traditional team and family values. Our company cares about staff, and the communities in which they operate, and takes pride in the projects that they deliver. We do our best to define and meet the highest standards when working with staff, neighbours, supply chain and stakeholders. The company retains and develops high-calibre, directly employed, staff across all disciplines, with a strong in-house production capability in civil engineering and infrastructure.

We have the senior management structure and staff resources in place to achieve the objectives and targets in the business plan via a regularly reviewed, and effectively communicated, strategy. The senior management are responsible for reporting our responsible business performance to the Executive Board and hold direct responsibility for implementing and delivering the policy across the organisation. Pelin İmre, Global HR Director, holds executive responsibility for responsible business, and the regional CEOs for modern slavery and ethical labour.

Gülermak has an independent internal audit function reporting to the Executive Board and undertakes a programme of risk-based audits across all offices and operations throughout the year. All audit reports are scrutinised by the Executive Board and shared with the relevant responsible leaders to implement appropriate measures to address any risks or control weaknesses.

GÜLERMAK'S SUPPLY CHAINS

Gülermak is committed to providing a safe, diverse, efficient, integrated, and sustainable organisation, which reflects all segments of the community in our operations and relationships. Our supply chain approach is open, flexible, and deals with a mix of local/national/global/SME/BAME suppliers. Our supply chain comprises the engagement of capable, regulated, agencies, suppliers, and subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products. We are committed to ensuring that modern slavery plays no part in our supply chain or any part of our business.

Before entering a contract, we undertake due diligence and assessments of the suitability and capability of our supply chain. This includes, but is not limited to, the following principles: modern slavery, suitability, and cyber security.

Our strategy for Supply Chain Management is founded on the premise that improving company and project performance depends on jointly improving performance with our suppliers. Inherent in this process is selection of the organisations with whom we develop close working relationships to deliver continual improvement and develop mutually beneficial partnerships. Our Supply Chain Management strategies are based on:

- Selecting subcontractors who can demonstrate the relevant skills, experience, and capability (as required by the legislation of a particular jurisdiction, e.g. CDM 2015 Compliance in the UK) and have a demonstrable, very good, HSEQ performance record
- Ensuring that our suppliers / subcontractors have taken the necessary steps to comply with the Modern Slavery Act, undertaken Right to Work checks on all of the people they intend to use on our projects, and pay in excess of the minimum wage including local agreements and / or the Living Wage

Gülermak's Equality Questionnaire Form ("EQF") is used to verify our supplier base who are not classed as strategic partners or preferred suppliers. The EQF requires suppliers to provide copies of their associated policies as part of the process.

Gülermak actively manages its relationships with our supply chain. There are clear contractual arrangements in place with all direct suppliers, who are required to sign up to our Standard Terms & Conditions.

COMPLEXITY OF SUPPLY CHAINS

The clear majority of the works undertaken by Gülermak can be considered as traditional, design and build or construct only building and civil engineering projects. Our supply chains can be classified as:

- Simple
 - single supply of bulk goods and commodities, e.g. aggregates, concrete, etc. but for complex services, e.g. architectural, structural, civil design, etc.
 - via a tier one supplier directly installing fabricated materials, e.g. Structural Steel, prefabricated concrete, cladding, glazing, etc.
- Straightforward – via tier one suppliers who may sub-contract part of their installation to a tier 2 supplier, but remain responsible for that tier 2 supplier
- Complex – representing less than 15% of our works operations, involving key services such as complex mechanical, electrical and system installations whereby core components can be sourced globally via multiple tiers in the fabrication of major components. In all cases, these complex elements of our works are procured via reputable, industry recognised, country based, specialist contractors

THE COUNTRIES WE SOURCE GOODS AND SERVICES FROM

All materials shall be sourced responsibly in line with our Code of Business Ethics, Corporate Social Responsibility Policy, Environmental Policy, and Health & Safety Policy that confirm our commitment to the consideration of integrity, safety, environmental, sustainability, social and ethical factors during selection and procurement.

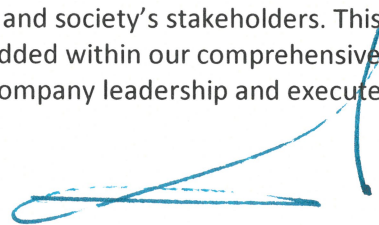
Gülermak complies with the wage requirements contained within the legislation of relevant jurisdictions. We will source materials by purchasing products provided by suppliers and subcontractors who can demonstrate their ability to comply with this Statement and any client-specified requirements. To ensure that suppliers procure goods from reputable, recognised suppliers in their country of origin, the following, reasonable, steps are taken:

- Suppliers are required to provide relevant certificates of conformity including agreement certificates
- Import certificates / licences confirming country of origin, if appropriate

POLICIES IN RELATION TO MODERN SLAVERY

As a responsible business, we operate with high ethical standards, particularly with regard to human rights. All our family of companies share a mutual Code of Business Ethics and other policies. These umbrella documents are delivered by the Executive Board of Gülermak. The principles of these policies are reflected in our vision and the development of our Modern Slavery Statement.

Gülermak is committed to maintaining the highest standard of ethics and social responsibility in its business activities. We recognise that we have an integral responsibility for all matters of general concern to the society in which we operate, and to all our own, and society's stakeholders. This responsibility is demonstrated through our actions and is embedded within our comprehensive suite of corporate policies, processes and procedures supported by company leadership and executed by all employees of the organisation without exception.



We have a range of policies that are available to all employees and that we make publicly available at <https://www.gulermak.com.tr/EN/policies>. Our policies set out how we expect our people, partners, and suppliers to behave and operate when representing us.

We have a zero-tolerance policy for bribery, corruption, modern slavery and human trafficking, and we have an independent whistleblowing process in place to ensure that we maintain high standards in all areas. All relevant officers, employees, and associated persons receive policy refresher checks annually.

Gülermak's policies are reviewed, as a minimum, on an annual basis. All reviews are undertaken in compliance with the Management Review Procedure that sets out the arrangements for review of the Gülermak Integrated Management System to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction of the company.

The safe, effective, fair, and robust management of staff and our supply chain is governed by the application of the following formal, integrated, policy statements:

Policies, procedures, and contractual terms	Relevant scope
Modern Slavery and Human Trafficking Statement	Gülermak's Modern Slavery and Human Trafficking Statement specifies the mandatory conditions of employment and contractual conditions for our supply chain. The sponsor for this statement is the Global HR Director.
Code of Business Ethics (CBE)	The CBE ensures that all Gülermak employees and any person who works for Gülermak are aware of the standards we set on conflicts of interest, work opportunities, confidentiality, anti-mobbing and anti-discrimination, fair treatment, protection and proper use of company assets, accuracy of recording and reporting, compliance with law, rules and regulations, relations with public administration and institutions, and political involvement.
Anti-Bribery and Anti-Corruption Policy (ABAC)	Bribery prevention, fair and open competition, insider dealing prevention, fraud prevention, whistleblowing, discrimination and isolation prevention are all covered by the Gülermak Anti-Bribery and Anti-Discrimination Policy. The sponsor for this policy is the Compliance Officer.
Corporate Social Responsibility Policy (CSR)	The Corporate Social Responsibility Policy is a declaration by Gülermak that we respect human rights, labour practices and social protection, the environments that we have direct or indirect impact on, and that we exercise fairness while operating and dealing with the public and our employees. Within this document, we also set out our standards for community involvement.
Health & Safety, Environmental & Sustainable Development, Quality Policy Statements (OHS, ENV, QAC)	With these three policies, we communicate that, for occupational health and safety, environmental aspects and impacts, continuous quality assurance, Gülermak follows the contemporary international standards, regulations, and laws. By these policies, we also guarantee the transparency and collaboration of our

	organisation with the community that we interact with.
Guidelines for Gülermak Employees on Anti-Mobbing & Anti-Discrimination	This document ensures that all Gülermak employees are well informed about discrimination, harassment, and mobbing, are able to recognise the above, know how to act if one or more of them occur(s), and know how to avoid them.
Whistleblowing Mechanism, plus systems and procedures to encourage the reporting of concerns and the protection of whistle blowers	Our Whistleblowing Mechanism is designed for protecting the anonymity of an informant (either a victim or a witness) in a situation where one or more of the following policies: CSR, ABAC, CBE, ENV, OHS, QAC, Modern Slavery, Anti-Mobbing and Anti-Discrimination, or any procedures implemented by Gülermak, is/are violated. This mechanism ensures the top management is well and informed about the incident(s) in a timely manner, and intervene to either stop escalation of the incident and/or to totally resolve the situation.
Standard contract clauses	Clauses on commitment to Gülermak's policies related to business ethics, environment, health & safety, anti-bribery, anti-corruption, equal treatment, and human rights are shared with all operational units to be included as standard in all our contracts with the supply chain. The clauses cover obligations on the requirement to maintain Gülermak's policies and procedures, right to work checks, and the keeping of employment records.

Policies alone are not enough. We are fully committed to proactively preventing any risk of unethical labour practices that may occur in any part of our business operations or in any part of our supply chain. Our whistleblowing process ensures that there is a clear and straightforward process in place to report any concerns, including or related to modern slavery.

DUE DILIGENCE

We have a long-established set of policies and procedures covering the standards we expect from our supply chain. We enforce our policies and procedures to ensure that modern slavery does not take place anywhere in our businesses or within our supply chains.

RECRUITMENT

We carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, we ensure that all applicants are aware of the background and Right to Work checks that we will carry out. We only make job offers subject to and following the satisfactory conclusion of vetting procedures.

All of our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checks and, where applicable, DBS checks. We employ most of our people directly or on a fixed term basis with checks in place to ensure that payment of salary is direct to that person. In addition to complying with legislative requirements, we carry out additional background checks on a risk basis, either through our own assessment or one carried out in conjunction with our clients.

SUPPLY CHAIN

For the key supply chain companies, Gülermak's procurement official should ensure that each company confirms Gülermak's Modern Slavery and Human Trafficking Statement. The Modern Slavery Act check form is to be completed by all supply chain companies prior to contracts being awarded. The completed form should contain the original signature of the person signing on behalf of the company. The original is to be retained on site and a copy forwarded to the Head Office for the attention of Carlos Sivila Sanz, Business Development Director.

Some subcontractors / suppliers may have supply chains that source materials, components and products, etc. from countries that have a high prevalence of modern slavery. Evidence should be sought from the subcontractor / supplier indicating what specific measures they have put in place to tackle this problem.

TRAINING

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, Gülermak:

- Has ensured that all Directors and Senior Managers have been briefed on the subject and provided with information and details regarding the actions we have taken and are planning to take in the future
- Has provided training for our staff via e-learning modules
- Ensures that awareness training about modern slavery is available to all relevant employees via the implementation, with associated briefings and coaching, of our policies, National Minimum/Living Wage & Modern Slavery Act compliance checks
- Makes all new employees aware of the Modern Slavery Statement, (plus all additional supporting and related policies) upon commencement of employment
- Has engaged our Tier One supply chain partners within our Behavioural Safety Programme via Director-led engagement days; this specifically includes coaching training and awareness of the Respect Agenda which is a key foundation of the programme

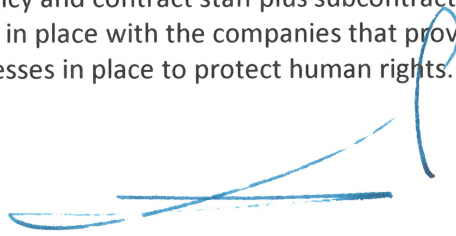
RISK ASSESSMENT

We have, while applying our formal Risk Assessment and Management Processes, undertaken an assessment of modern slavery risks within Gülermak's own operations, offices and construction sites. In undertaking this risk assessment, we considered:

- The location of our operations (offices and sites)
- The nature of works being undertaken
- The workforce delivering the works (in-house and subcontract)
- Recruitment and Right to Work processes
- The absence, to date, of any reports or concerns regarding modern slavery

As well as direct employees, Gülermak has agency and contract staff plus subcontractors working at our sites. Contractual terms and conditions are in place with the companies that provide Gülermak with agency staff, requiring them to have processes in place to protect human rights.

Potential high-risk areas:



- Occasions when security, cleaning and catering services are procured
- Where we operate outside of our normal geographic region and procure new suppliers / subcontractors

2021 RISK ASSESSMENT

According to the risk assessment conducted in our company and those in the projects we deliver, we confirm that the risk of modern slavery occurring within our operations, direct employee population, or contract staff and suppliers/subcontractors under our direct supervision, is very low.

EFFECTIVENESS OF MEASURES

Our policies, procedures and contractual terms are clear on the need to protect human rights. However, we recognise that these measures can only give a limited degree of comfort that modern slavery and related practices are not occurring within our Tier One and regularly used supply chains. We will continue to develop our approach, systems and procedures to mitigate the risks of modern slavery occurring in lower tier of our supply chain.

A natural consequence of the risk management process is the identification of high-risk projects / high-risk supply chains. Should these be identified, we will assess whether further targeted auditing of selected suppliers is deemed necessary to mitigate a higher risk. We confirm that in 2021, there were no recorded instances, or any issues raised relating to modern slavery in any part of our business operations or, to the very best of our knowledge, within any of our suppliers or subcontractors. On the basis that we have had no recorded incidents and no complaints have been raised, it is reasonable to affirm that our measures are effective and our assessment of the risk being very low is fair and reasonable.

ACTIONS IN THE LAST REPORTING YEAR

In the last reporting year, we have:

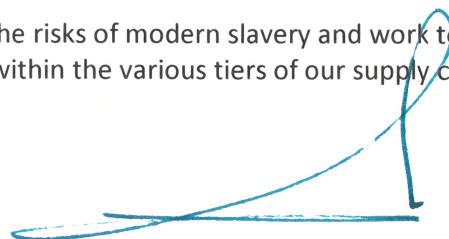
- provided a mandatory training module about our policies for all staff
- developed a Corporate Social Responsibility policy in which we reinforced our commitment to combatting modern slavery
- employed a dedicated Supply Chain Manager and reviewed our purchasing practices, so that in compliance with fair and open competition, we give sufficient time for our suppliers to provide suitable quotations
- made further improvements to the recording and monitoring of data provided by our supply chain

CHALLENGES

Materials shortages and labour commitment are expected to be the two of the biggest challenges facing the construction industry in 2022.

With the impact of an ageing workforce and the growing preference for remote working, which do not entirely fit the practices of the construction industry, there is an even bigger need to train and recruit workers to meet the required quantity and quality of outputs, as the number of investments in infrastructure keeps increasing.

This presents a challenge. We must remain vigilant to the risks of modern slavery and work together with the industry and clients to prevent this occurring within the various tiers of our supply chain.



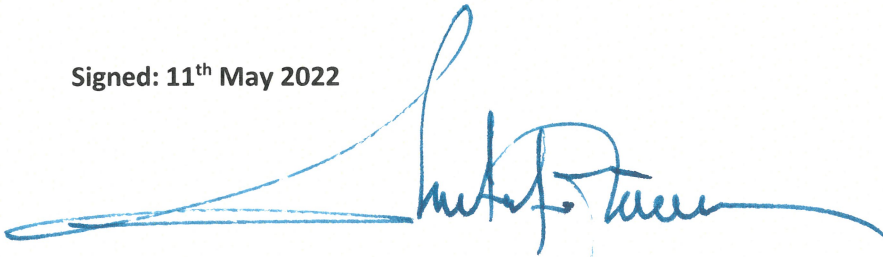
FUTURE PLANS

During the next year, we will take the following steps to reduce the risk of modern slavery:

- Further development and implementation of a modern slavery training course, available as a mandatory training course for every employee on an e-learning portal
- Our integrated suite of policy statements will be reviewed and revised to reinforce our zero-tolerance approach to any form of modern slavery, including the use, in any form, of forced labour
- The terms and conditions under which we engage our suppliers and subcontractors will be revised to include key terms reinforcing the requirement of our supply chain to visibly comply with the Modern Slavery Act, adopt our same zero-tolerance approach and demand the same expectations from their suppliers
- Criteria to assess the level of compliance with the Modern Slavery Act 2015 will be included in the evaluation of external providers both before awarding a contract and after their job is completed
- Continued implementation and embedment, via associated briefings and coaching, of our management system, human resources procedures, national minimum/living wage & Modern Slavery Act compliance checks. Specifically linking Gülermak's human resources procedures to our supplier approval and accounting system such that it is mandatory for suppliers to return completed forms, signed by a senior executive, confirming they have completed the necessary Right to Work, national minimum/living wage & Modern Slavery Act compliance checks on their company and their supply chains

This statement is made in accordance with Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes the Gülermak group of companies Modern Slavery Statement for the period ending 31st December 2022, published in May 2022. Our next statement will be published in January 2023.

Signed: 11th May 2022



Mr. Mustafa Tuncer; Chairman of Executive Board