



YÜKSEL BUSINESS ETHICS

YÜKSEL is an international contractor company which aims for the highest ethical values in its work processes. It embraces this goal by using well-equipped and high qualified employees along with modern technology. As an organization, Yüksel operates according to the ideals of HONESTY, RESPECT, by recognizing the value of each employee, RESPONSIBILITY and COMPATIBILITY, by paying great attention to teamwork, and HIGH QUALITY, by providing creative solutions and the advanced technology for all our clients.

Focusing on its own business ethics, YÜKSEL constituted an institutionalized roadmap organizing its corporate behavior towards its clients, suppliers, subcontractors, competitors and employees. Since 1963, endeavoring to reach world quality standards, YÜKSEL have become worldwide recognized contractor company.

In contemporary, evaluated as an institution of solution, with its institutionalized structure, qualified labor force and advanced technology, YÜKSEL ranked as one of the most advanced companies, both in national and international markets.

1. Quality

YÜKSEL aims to respond to the needs and expectations of our both local and international clients and employers in the best way possible within the context of local laws, legislation and technical agreements.

2. Environment

YÜKSEL works in compliance with the "Environment Management System" and ISO 14001:2004 standards. YÜKSEL avoids business processes that cause environmental pollution and we pay attention to using natural resources responsibly.

3. Occupational Safety and Security

YÜKSEL targets is zero accidents at work places by preparing a safe and secure work environment using our management system in compliance with laws and legislation, calculating any possible risks and applying these calculations completely.

4. Integrity

Long term and reliable work relations are established when all parties involved in the relationship are honest, open and fair. All employees are expected to comply with professional honesty, propriety and all other rules.

5. Respect

Temporary employees, contracted workers, agencies, administrative employees and directors each are fundamental pieces of YÜKSEL's success. Everyone is a part of this organizational team and deserves respect and honor.

6. Society

YÜKSEL pays attention to physical and social laws in the context of its work as a member of this global market. It encourages awareness with respect to society and supports common sense and justice in all its endeavors.

7. Accounting and Reporting

YÜKSEL is a corporate company established in compliance with Turkish Codes of Law and is obligated to apply all of the financial reporting and accounting legislation according to the laws of the Republic of Turkey. Its duty is to keep precise and complete records of its financial and commercial processes and to collect these in the form of necessary reports. In addition to this, YÜKSEL never ignores the rules and legislation of any foreign country with which YÜKSEL is conducting business.

8. Laws Regarding False Claims

National and international laws are enabling contacting firms to claim extra contractual rights, in the event of providing extra contractual services. However, due to laws and ethical rules, this opportunity should not be evaluated for abuse or tricky claims. Invoices of either contractual or extra contractual services should be made out accurate and honest.

9. Accountability

YÜKSEL has no objection to open its financial records and cost data for auditing. However, this kind of investigation provides very confidential information for the auditor. Therefore, auditor should guarantee the aim and usage of the knowledge to be provided by auditing. This is a very natural right of YÜKSEL.

10. Procurement Integrity Laws

Taking competition as an essential value in supplying goods and services and providing prices calculated by this principle by the national and international organizations are convenient attempts for procurement integrity rules. YÜKSEL should consider this rule in every action and prioritize the competition.

11. Fair Competition

Fair competition rules prohibit agreements that reduce or discourage competition. It is YÜKSEL's policy to adhere strictly to all fair competition and antitrust laws. YÜKSEL does not participate in events that will keep its competitors out of the market by limiting trades in an unfair method.

12. Anti-Kickback and Bribery Laws

In the Republic of Turkey, and in many other countries, it is illegal to provide, offer or accept a kickback or bribe. YÜKSEL combats strictly with kickback or bribe, which may be defined as any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, and that has as one of its purposes the improper obtaining or rewarding of favorable treatment in a business transaction.

13. Conflict of Interest

An organizational conflict of interest may arise where the nature of the work to be performed by YÜKSEL may result in an unfair competitive advantage for YÜKSEL, impair YÜKSEL's objectivity in performing the work, or make YÜKSEL unable to render impartial assistance or advice to the customer. YÜKSEL complies with all laws and regulations prohibiting organizational conflicts of interest.

14. Confidentiality

YÜKSEL employees, officers and directors must maintain the privacy of confidential information entrusted to them by YÜKSEL or its suppliers, customers, or joint venture partners, except when disclosure is authorized by or required by laws, regulations or legal proceedings. Confidential information includes all non-public information that might be of use to YÜKSEL's

competitors, or harmful to YÜKSEL or its customers if disclosed. YÜKSEL keeps documents that contain confidential information protected and secure and does not disclose confidential information to anyone without proper authorization.

15. Business Courtesies

YÜKSEL selects suppliers and wins customers on the basis of the merits of its people, products and services. To avoid even the appearance of impropriety, there are substantial restrictions on the types of business courtesies. The term “business courtesies” covers gifts, services, meals, entertainment, unusual hospitality, or other things of value.

16. Drugs and Alcohol

Work requires clear thinking and, often, the ability to react quickly. Being under the influence of alcohol or drugs or improperly using medication diminishes the ability of best performance. It is YÜKSEL's policy to prohibit the sale, use, possession or influence of alcohol or nonprescription controlled substances, including illegal drugs, on YÜKSEL property. As a result of the given importance to prevent the usage of drugs and alcohol by YÜKSEL, the second part of this Business Ethics Program was assigned to new codification named as “Drug-Free Workplace Awareness Program”.

17. Employee Privacy

YÜKSEL respects every employee's right to confidentiality of certain employment records, including certain health information, as well as the privacy of personal activities outside of business hours. Employees who are responsible for maintaining personal information, and those who are provided access to such information must not disclose it inappropriately.

18. Workplace Relations and Proper Conduct

Everyone at YÜKSEL behaves fairly and honestly. The company complies with rules not only in its relations with local, national and international agencies and governments, but also in its relations with its employees, suppliers, clients and other associates. Workplace relations are based on equality and respect regardless of race, color, religion, sex, national origin, age, medical status or disability, sexual choice or seniority. Any kind of insulting statements or behaviors towards any employee are forbidden.

19. Company Resources

YÜKSEL's resources include its facilities, computers, inventory, trade secrets, office supplies, equipment, products, confidential information, and funds. All employees are responsible for

using good judgment to ensure that these resources are not misused or wasted. Theft, carelessness and waste have a direct impact on YÜKSEL's profitability. Also, any misuse or misappropriation of YÜKSEL's assets may be considered criminal and can bring severe consequences.

20. Corporate Image

YÜKSEL's reputation and identity are among the company's most valuable assets. As part of keeping and furthering the corporate image locally and around the globe, YÜKSEL believes in conducting business in accordance with the law and the highest standards of business conduct, and in sharing the success that business brings. You are expected to conduct yourself in a manner that reflects positively on the YÜKSEL's image and identity.

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