

Sempro Consultancy, Engineering and Representative Services

POL-005

Compliance Policy

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1. PURPOSE AND SCOPE

The Compliance Policy ("Policy") is the main and primary document that regulates related legal and regulatory compliance obligations of Sempro Danışmanlık, Mühendislik Hizmetleri ve Temsilcilik Ltd. Şti. ("Sempro"). This Policy seeks to:

- establish an enterprise-wide compliance program where every employee of Sempro accepts personal responsibility for compliance and acts ethically and with integrity,
- develop and maintain practices that facilitate and monitor compliance within Sempro,
- take appropriate corrective action with a view to preventing recurrence of incidents of non-compliance or breaches.

Compliance Policy applies to all employees including the General Manager, Managers and Supervisors, consultants, Sempro's outsourcing companies, business associates and their employees.

This Policy is an integral part of the Sempro's ethical rules.

2. DEFINITIONS

Compliance is ensuring that the requirements of applicable laws, contracts, equitable obligations, regulations and organizational standards are fulfilled. Non-compliance means a breach by an employee or an outsourced firm, their employees or business partners of applicable laws, contracts, equitable obligations, regulations or organizational standards.

Compliance program means the condition that all employees of Sempro including shareholders, the Directors, Managers and Supervisors, consultants, outsourcing companies, business associates and their employees adhere with law and other kind of legal regulations, ethical values.

3. POLICY OVERVIEW AND RESPONSIBILITIES

Sempro recognizes that there are four elements for an effective compliance program:

- **Commitment** means the establishment of a compliance program in the Sempro.
- **Implementation** of a compliance program includes ongoing education and maintenance to employees.
- **Monitoring and Measuring** means reporting and supervision of the compliance program.
- **Continual Improvement** means regular review and continual improvement of the compliance program.

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These elements are supported by compliance principles. To comply with these principles, Sempro:

1. All employees are responsible to Encourage and support an effective person organizational structure which endorses an ethical and positive compliance program within Sempro. The general manager retains the ultimate responsibility for legal and regulatory compliance and is charged with overseeing, reviewing and ensuring the effectiveness of Sempro's compliance systems.
2. The general manager leads and Maintains an appropriate compliance program which identifies, manages, reports, reviews, monitors and measures compliance obligations and compliance performance. Employee of Sempro are responsible for ensuring effective implementation and maintenance of this Compliance Policy and thus all employees adhere to the associated systems and guidelines and are also responsible for the improvement of this Policy.
3. Ensures clear accountability for the compliance program, obligations and any compliance issues within Sempro and takes very seriously any failure by an individual to comply with Sempro's compliance obligations. A number of consequences may occur from an individual's actions including, in serious matters, disciplinary sanction which are not contrary to the Labour Law and determined within the scope of the Workplace Regulation. In this context, the investigation of non-compliance shall be conducted by the Auditor(s) appointed by the Directors. However, the final decision made by the Directors.
4. Provides to all employees necessary resources, including education and training as part of the implementation of compliance program, to enable to understand their own personal accountability in respect of compliance and to be able to effectively carry out their responsibilities.
5. Within the scope of the compliance program, Sempro's relations with outsourced companies, business partners and employees of these companies will be observed by the General Manager and Sempro employees in accordance with the compliance policy.

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