



## SOCIAL POLICY

### **ERG's Commitment to Sustainable Development**

ERG OTOYOL YATIRIM İŞLETME A.Ş. and its controlled affiliates (the "Company" or "ERG") aims for sustainable development outcomes and is committed to the integration of environmental, health, safety, social and security considerations into its procedures for project development and operation at all stages.

As part of its commitment, ERG has therefore developed policies that protect our stakeholders and environment wherever we conduct our business.

### **ERG Social Policy**

ERG recognizes good management of social considerations as highest corporate priority and is committed to the establishment of sustainable relationships with its stakeholders, in particular with those communities surrounding its projects. ERG seeks relationships which demonstrate mutual respect and understanding, active partnership and long-term commitment.

The Company implements an Environmental & Social Management System for its operations which seeks to minimise and mitigate any adverse social impacts generated by its activities on cultural heritage and communities surrounding its projects, and to enhance beneficial social impacts and in accordance with internationally recognised business best practice. The implementation of this Social Policy and the Company's associated social procedures is a key requirement during all stages of project development.

### **Stakeholder Engagement**

Company recognises that good management of relationships is essential to business success and the management of its operations. The Company also recognizes that at every stage of a project potential negative effects may occur due to a lack of communication and stakeholder engagement.

The Company realizes that it is operating in environments with different cultures, lifestyles and heritage and thus manages stakeholder relationships based on respect, full transparency and open communication. All its operations are required to be implemented in accordance with Stakeholder Engagement Plan (SEP) developed for the Project. This includes details of the disclosure of environmental and social information and the Company's grievance mechanism, which will be made available to all Project affected settlements and kept operational throughout ERG's construction and operation activities.

Company will implement Livelihood Restoration Plan (LRP) and Resettlement Action Plan (RAP) it has developed for the Project to manage the potential effects of Project-related land acquisition on the Project Affected People (PAPs) in accordance with International Finance Corporation (IFC) Performance Standard on Land Acquisition and Involuntary Resettlement.

### **Cultural Heritage**

The Company will manage cultural heritage in consultation with relevant communities and national cultural heritage specialists. The Company seeks to avoid or minimise any impact to cultural heritage, both tangible and intangible. Where avoidance of negative impacts is not possible, the Company requires its operations to work with competent professionals to assist in the identification and protection of cultural heritage. ERG, subject to appropriate consent, promotes the collection, analysis and dissemination of cultural heritage information and knowledge and takes an open and transparent approach.

### **Compliance**

The Company will comply with all applicable legislation relating to social considerations. The Company also adheres to the standards and guidelines of the International Finance Corporation and European Bank for Reconstruction and Development.

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ERG requires its consultants, contractors, subcontractors, suppliers and subsidiaries to adhere to the principles of this Social Policy as a minimum standard.

**Continuous Improvement**

The Company will review its Social Policy on a periodic basis and update it as necessary. It will also regularly update or improve its Environmental, Social, Health and Safety Management System by performing periodic, systematic, internal audits. It will use the results as a basis for continuous improvement in social performance through an adaptive management process.

The CEO of the Company is going to be responsible on conformance of the Policy and it's execution.

This policy was approved by the Board of Directors on 11<sup>th</sup> of June 2018.

