

ANTI-BRIBERY AND CORRUPTION POLICY



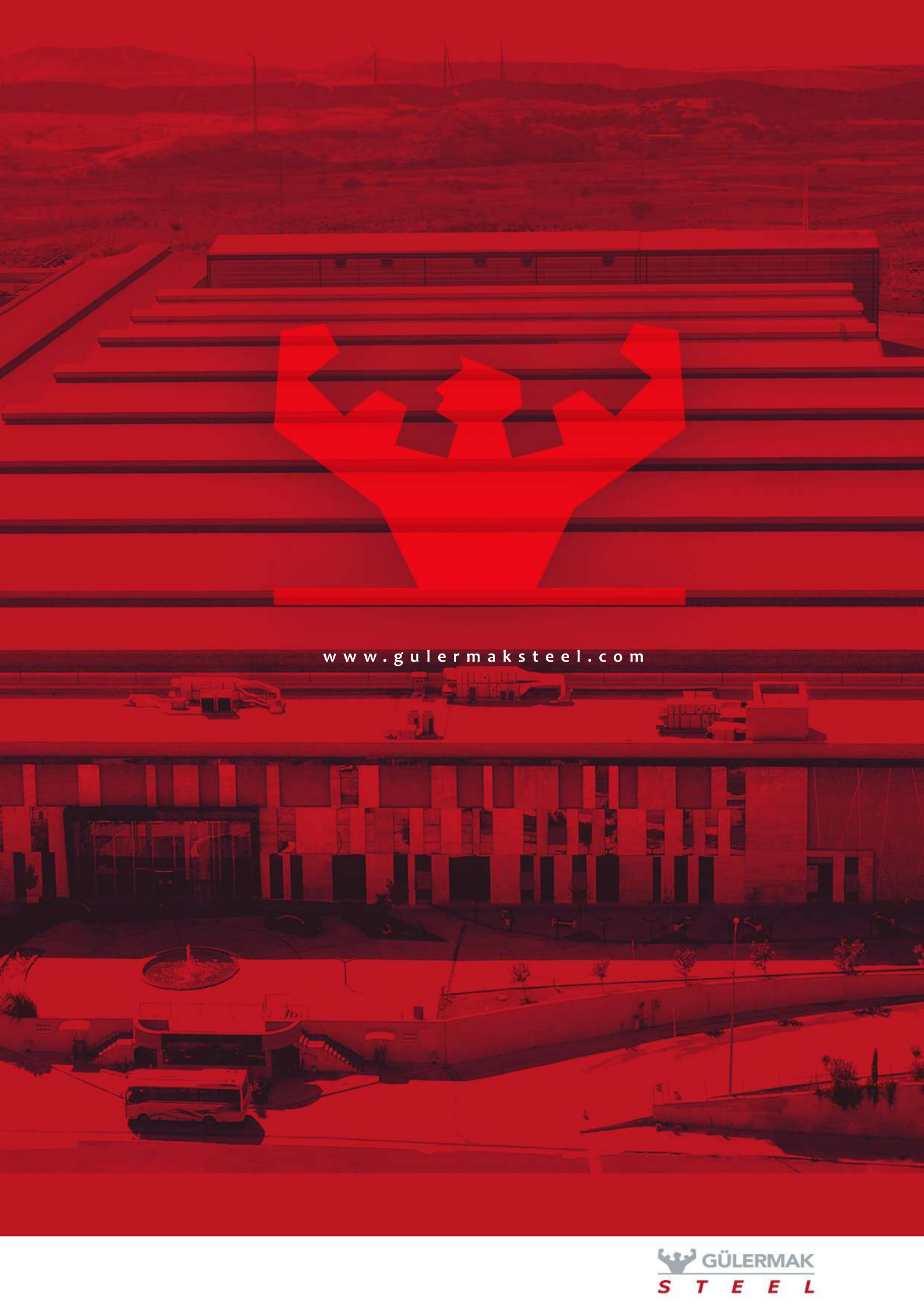
Gülermak provides construction and contracting services all over the globe.

We conduct our business professionally, with integrity and in compliance with the laws of those jurisdictions in which it operates. Our reputation for acting fairly is built on our values as a company and the values of our employees. As part of our commitment to ethical business practices, we will not tolerate acts of bribery or corruption. This policy applies to all Gülermak employees (whether permanent or temporary), contractors, directors and managers of Gülermak, its subsidiaries and joint venture companies under Gülermak's control, also in compliance with any laws and regulations, as the minimum obligations. Third party acting on behalf of or in the name of Gülermak, including agents, representatives and other intermediaries, are required to act consistently with this policy.

In case of joint venture companies not under Gülermak's control, and our joint venture partners, Gülermak take obligation to encourage to adopt similar policy and procedures to prevent bribery and corruption.

Gülermak operates a zero-tolerance approach to bribery and corruption

Gülermak operates a zero-tolerance approach to bribery and corruption in relation to bribes (payment, offer or promise to pay or provide anything of value), gifts and hospitality, facilitation payments (small payments or fees to speed up or facilitate the performance of routine action to which an entitlement already exists) and payments to government officials.



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