



77 İnsaat ve Taahhut A.S.

Sanctions and Screening Policy

Approved: November 2019

A. Purpose:

77 İnsaat ve Taahhut A.S. is committed to complying with relevant economic and trade Sanctions laws (“Sanctions”) in all jurisdictions in which it operates as they may apply to its operations. 77 İnsaat ve Taahhut A.S. is also cognizant that risks exist with doing business with politically exposed persons (“PEPs”), individuals/entities with criminal or civil violations, and companies with negative media. We will follow this policy to avoid violating any Sanctions or exposing 77 İnsaat ve Taahhut A.S. to conducting business with individuals or entities whose relationship may damage our reputation.

B. Applicability:

The Sanctions and Screening Policy (“SSP”) is applicable to:

- (a) all employees, officers, directors, and contracted personnel of 77 İnsaat ve Taahhut A.S. (each an “Employee”, collectively “Employees”); and
- (b) all natural and legal persons (and their respective employees, officers and directors) that perform services for or on behalf of 77 İnsaat ve Taahhut A.S., including without limitation, supply chain business partners, suppliers, consultants, contractors, distributors, and agents (each an “Associated Person”, collectively “Associated Persons”).

C. Compliance:

1. Procedures for Screening Employees and Associated Persons

77 İnsaat ve Taahhut A.S. has contracted with Thompson Reuters to obtain its World-Check program which provides global sanctions lists as well as PEPs, criminal records, US SAM information, negative media, and other information. Screening will take place as follows:

- a) **New Employees:** Before hiring a new Employee, 77 Insaat ve Taahhut A.S. will check the individual's name within World-Check. If the individual's name appears on any global sanctions list, any offer of employment must be withdrawn and the individual may not be hired unless clear evidence is presented showing that the matters leading to appearance on the sanctions list(s) have been favorably resolved. If the individual is listed as a PEP or derogatory information exists, the World-Check information must be reviewed by the Chief Compliance Officer.
- b) **Current Employees:** On an annual basis, 77 Insaat ve Taahhut A.S. will review all Employees within World-Check. If an individual's name appears on any global sanctions list, the individual's employment will be terminated unless clear evidence is presented showing that the matters leading to appearance on the sanctions list(s) have been favorably resolved. If the individual is listed as a PEP or derogatory information exists, the World-Check information must be reviewed further by the Chief Compliance Officer for further resolution. The Chief Compliance Officer will determine if termination is required or if other action needs to be taken.
- c) **New Associated Persons:** Before entering a contract or implementing a financial transaction with a New Associate, 77 Insaat ve Taahhut A.S. will check the New Associate within World-Check. If the New Associate's name appears on any global sanctions list, 77 Insaat ve Taahhut A.S. will not engage in a business transaction with the New Associate unless clear evidence is presented showing that the matters leading to appearance on the sanctions list(s) have been favorably resolved. If the New Associated is listed as a PEP or derogatory information exists, the World-Check information must be reviewed by the Chief Compliance Officer to determine if further action is required.
- d) **Current Associated Persons:** On a monthly basis, 77 Insaat ve Taahhut A.S. will review all Associates within World-Check. If an Associate appears on any global sanctions list, 77 Insaat ve Taahhut A.S. will take immediate action to terminate all business relations with the Associate unless clear evidence is presented showing that the matters leading to appearance on the sanctions list(s) have been favorably resolved. If the Associate is listed as a PEP or derogatory information exists, the World-Check information must be reviewed by the Chief Compliance Officer to determine if further action is required.

2. Business Unit Certification and Associated Person Certification

Each Business Unit, on a monthly basis, will submit a monthly report of all Employees and Associated Persons screened through Thomson Reuters Word-Check.

77 Insaat ve Taahhut A.S. requires all Associated Persons to confirm they are aware of Sanctions compliance, and that they have a compliance culture to detect and prevent violations of applicable Sanctions.

3. Responsibility

The Chief Compliance Officer is responsible for ensuring 77 Insaat ve Taahhut A.S. is compliant with Sanctions. The Chief Compliance Officer will:

- (a) inform Employees and Associated Persons of any material Sanctions developments/updates as soon as practicable;
- (b) monitor and help update this Sanctions Policy as appropriate; and
- (c) take all steps necessary to comply with applicable legislation and guidance, including advising 77 Insaat ve Taahhut A.S. when disclosures are required to any applicable authority.

4. Consequences of Failure to Comply

Failure to comply with relevant Sanctions laws would constitute a breach of legal and/or regulatory requirements, and can expose 77 Insaat ve Taahhut A.S. to significant reputational damage, legal and regulatory actions, and financial loss.

77 Insaat ve Taahhut A.S. has a zero tolerance approach to intentional violations of this Policy or applicable Sanctions regimes. If an Employee fails to comply with this Policy, then he/she may be subject to disciplinary action that may include dismissal from employment. Disciplinary measures will depend on the circumstances of the violation and will be applied in a manner consistent with 77 Insaat ve Taahhut A.S.'s policies. In addition, Employees who violate the law during the course of their employment may also be subject to criminal and civil action.

77 Insaat ve Taahhut A.S. may terminate a business relationship with any Associated Person (including terminating all contracts and agreements in force between 77 Insaat ve Taahhut A.S. and any such Associated Person) by means of written notice to the Associated Person in the event that: i) the Associated Person fails to comply with any provision in this Policy; or, ii) the Associated Person becomes a Specially Designated National (US) or the subject or target of an applicable Sanctions regime.

5. Audits

Each Associated Person shall, without expense to 77 Insaat ve Taahhut A.S., provide access (with appropriate prior notice from 77 Insaat ve Taahhut A.S.) to all relevant documents, records, systems, processes, policies and procedures in order to enable 77 Insaat ve Taahhut A.S. (or its third party professional representatives) to audit and verify compliance by the Associated Person with this Policy. If an audit shows that an Associated Person is in breach of this Policy then the Associated Person shall, without delay, implement the necessary corrective action as determined by 77 Insaat ve Taahhut A.S..

D. Reporting of Violations

77 Insaat ve Taahhut A.S. is fully committed to culture of transparency. Employees and Associated Persons should not be afraid to come forward if they believe a violation of the SSP has occurred. If an Employee or Associated Person becomes aware of any suspected or known violation of this Policy or he/she realizes that 77 Insaat ve Taahhut A.S. or an Associated Person performed a transaction prohibited by Sanctions, then he/she has a duty to promptly report such concerns in accordance with 77 Insaat ve Taahhut A.S.'s Code of Conduct.