



ESER TAAHHÜT VE SANAYİ A.Ş.
ESER Contracting & Industry Co. Inc.



2012 -2013 Communication on Progress Report



This is our **Communication on Progress**
in implementing the principles of the
United Nations Global Compact.

We welcome feedback on its contents.

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Dear Mr. Secretary-General,

I would like to reinforce our commitment and support of the UN Global Compact. Despite very difficult trading conditions, we have succeeded in sustainability. Underpinning this has been an increase in audits, which has helped us to address noncompliance and improve our procedures and processes. We continue to support individuals most disadvantaged within the market place that we operate.

This document will be available on our website and communicated to our staff.

This is our forth COP letter. We have been privileged to be part of the global compact principles which are now fully embedded within the culture of the organization.

We remain committed to the UNGC and plan to increase the momentum and take particular steps in this respect. We have been working for constant improvement of working conditions environmental protection and in that direction we introduced such systems as ISO 9001-2000, ISO 14001-2004, and OHSAS 18001:2007 for health protection and operation safety.

I am pleased to confirm that Eser Contracting and Industry Co. Inc. confirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication. I am delighted that Eser Contracting and Industry Co. Inc. has been recognized as a leading company of a socially and environmentally responsible business in the area we have worked.

We continue to operate into new markets like Nigeria, Cameroon and Turkmenistan. We will bring these core principles with us into these markets, to our clients, partners and suppliers, as well as continuing to reinforce them within our way of business.

By this way I would like to thank to United Nations for this effort in making this world a better place for us and for the future generations.

Sincerely yours,

Can Adiloğlu
Vice Chairman

Company Details

Company name: Eser Contracting and Industry Co. Inc.

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Contact position: Vice Chairman

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Period Covered: 20/10/2012 - 20/10/2013

Membership date: 03/10/2007

No. of employees: 170

Sector: Construction & Property

environment where people's lives are inextricably linked with those of other human beings. A guiding principle of the firm is that everyone accords to others the rights that individuals claim for themselves and accept the moral and humanitarian values that this embraces. A person cannot be treated just as a link in a chain of command but as someone whose happiness and prosperity is a concern of all.

Brief description of the company

Eser Contracting and Industry Co. Inc. is a leading multi-disciplinary construction company in Turkey. We provide quality solutions from our headquarters in Ankara. Our International Group incorporates strategic Partnerships in over 10 places worldwide.

Our vision is to harmonize buildings with their surroundings, maximizing the natural resources available and to deliver a sustainable future for future generations.

Operational structure

Eser Contracting and Industry Co. Inc. have a clear organizational structure, a strict hierarchical line, a precise definition of individual objectives and a strict definition of individual responsibilities. The operational organizational line is that of a decentralized model, both geographically and functionally, through three areas of various activities.



Statement of support

Eser Contracting and Industry Co. Inc. supports and respects the protection of internationally proclaimed human rights and ensures that it is not complicit in human rights abuses. We have placed a new Global Human Rights Code of Practice, states that: Eser Contracting and Industry Co. Inc. is founded on the principles of ensuring that our people's work is interesting, rewarding and stimulated by a drive for excellence in an

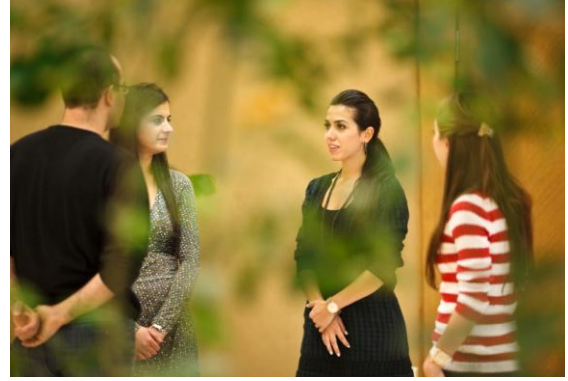
Principle 1 and 2: Human rights

Business should support and respect the protection of international human rights within their sphere of influence

Business should make sure they are not complicit in human rights abuse

Our commitment

Eser Contracting and Industry Co. Inc. comply fully with and support the Human Rights Act 1998 and the UN's Universal Declaration of Human Rights. Eser Contracting and Industry Co. Inc. does not undertake business with any countries or regimes where flagrant human rights abuses are known. Eser Contracting and Industry Co. Inc. is an equal opportunity employer and is fully committed to a policy of treating all of its employees and job applicants equally. The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, and selection for redundancy and dismissal. We are committed to meeting all of our staff's needs and helping them develop as well-rounded individuals. We do this by supporting training and skill enhancement, and actively building recognition, pride, a sense of achievement and fulfillment into our working practices.



Eser Contracting and Industry Co. Inc. is committed to respecting the Human Rights of its staff, stakeholders, clients, to whom it provides a service, promoting values such as dignity, respect, fairness, and equality. It will continue to develop policies and practices in accordance with Human Rights Act.

We ensure our policy is circulated to any subcontractors/ suppliers we work with, reminding them of their responsibilities.

Our systems

Most of the human rights issues are fully considered and respected at Eser. All the employees of the group are well treated, fairly apprised on an annual basis, and compensated financially and morally based on their achievements and work. Therefore they are motivated and more productive. All safety measures are applied at the work places –offices and site areas- and health issues are also taken into consideration.

Assessment, policy and goals

The Company will take all reasonable steps to employ, train and promote employees on the basis of their experience, abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including color, nationality and ethnic or national origins), religion or belief, sex or sexual orientation.

The Company will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free from harassment and bullying based upon age, disability, gender reassignment, race (including color, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. The Company will not condone or tolerate any form of harassment, whether engaged in by employees or by outside third parties who do business with the Company, such as clients, customers, contractors and suppliers. We ensure our policy is circulated to any subcontractors/ suppliers we work with, reminding them of their responsibilities.

We maintain and review the employment records of all employees in order to monitor the progress of this policy. The results of any monitoring procedure are reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration is given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and employees.

Implementation

Eser Contracting and Industry Co. Inc. has an Equal Opportunities policy and is

publicly available, ensuring that no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of race, color, ethnic or national origin, religious belief, political opinion or affiliation, sex, marital status, sexual orientation, gender reassignment, age or disability. We are committed to ensuring that all employees are treated with dignity and respect. We maintain a neutral working environment in which no employee or worker feels under threat or intimidated. We ensure our policy is circulated to any subcontractors/ suppliers we work with, reminding them of their responsibilities to the equality of opportunity. As part of our company inductions, our Equal Opportunities policy is discussed with all employees. Equalities and human rights are also detailed within our employee handbook. We also ask all employees to complete an equal opportunities monitoring questionnaire upon starting with the Company. Our policy is reviewed annually to measure the effectiveness and implementation of the policy.



Measurement of outcomes

Eser Contracting and Industry Co. Inc. has never been subject to any investigations, legal cases or incidents relating to Human Rights violations or Equality issues. Internally at Eser, abuses in human rights are not conducted, and no form of any

complicity is done. No form of force is conducted with employees at all. Relocations of employees between the different site offices of the group geographically are sometimes done whenever the employees are needed there due to their experience. In those cases, the employees are fairly rewarded by having a convenient place to live in and also financially rewarded. Moreover the company does not undertake any employment discrimination when it comes to hiring employees and only employs the ones who are most qualified for the job. An internal process is taken first before looking outside the company when there is a job opening that always keeps the employees motivated. Eser works with several elementary schools and even universities in the field of environmental awareness and energy efficiency programs

Principle 3, 4, 5 and 6:

- ***Business should uphold Freedom of association and the effective recognition of the right to collective bargaining***
- ***Business should eliminate all forms of forced and compulsory labor***
- ***Business should uphold the effective abolition of child labor***
- ***Business should eliminate discrimination in respect of employment and occupation***

Our commitment

Eser Contracting and Industry Co. Inc. is committed to the principles listed above. We respect people's rights to have employee representation, including their right to join unions and we do not tolerate harassment. The company has a staff representative group which is involved in strategic decision making and communications. Our employees are encouraged to seek professional membership of a relevant body. We recognize that to produce work of high quality, to maintain our reputation for innovation and creativity and to understand and delight our clients we need to fully embrace the skills, talents and knowledge that only a diverse workforce can offer. We work to ensure that everyone feels that their contribution is valued and their successes are celebrated through our process and through our training and development, which encourages knowledge sharing, intellectual growth and stimulation. Eser Contracting and Industry Co. Inc. support this process by paying for fees, and supporting training. We have a policy of zero tolerance to the use of child labor.

We do not employ individuals that are younger than the legal school leaving age. Eser Contracting and Industry Co. Inc. supports the ILO's Declaration on Fundamental Principles and Rights at Work. We will not undertake any business with any company who uses forced or child labor.



Last year, we employed 11 new trainees, offered 5 work experience placements and visited by 3 schools. Our Equalities and Diversity policy and strategy are monitored by our HR group to ensure the policy is embedded throughout our business. Eser Contracting and Industry Co. Inc. has also provided diversity and equal opportunities training to staff. Subject to the relevant laws in the countries where we operate, we fully respect the right of our people. We aim to ensure that our people have satisfactory

wages and working conditions and that there is no exploitation of labor.. We ensure that Eser Contracting and Industry Co. Inc. people work in an environment that is free from all forms of discrimination - gender, race, origin, background, religion, marital status, sexual orientation, disability or age, and that they are valued as individuals and treated with dignity and respect. Addressing gender imbalance in Arup is our priority in a wider diversity drive. We believe improving gender balance will help us to nurture creativity and innovation, tap hidden capacity for growth and improved competitiveness, and positively impact financial performance.



Assessment, policy and goals

Eser Contracting and Industry Co. Inc. enforces a formal Equal Opportunities policy which states that no job applicant, employee or worker is discriminated against either directly or indirectly on the grounds of race, color, ethnic or national origin, religious belief, political opinion or affiliation, sex, marital status, sexual orientation, gender reassignment, age or disability. Eser Contracting and Industry Co. Inc. maintain a detailed Employee Handbook detailing employees' rights and responsibilities and benefits. Remuneration is clearly detailed on their Main Terms and Conditions.

Implementation

Eser Contracting and Industry Co. Inc. employees are issued with a Employee Handbook relating to their employment for the company. This states their terms and conditions including pay, holidays, etc. this handbook also contains information on the standard terms and conditions of employment, company benefits, standards, grievance and disciplinary procedures, etc. Eser Contracting and Industry Co. Inc. employs trained HR personnel experienced in all aspects of Employment law and have access to various publications/ articles etc. on employment law. Eser Contracting and Industry Co. Inc. has in place a number of policies relation to employment, including maternity, paternity, applying for flexible working, etc.

Health & Safety

Health and Safety is drawn to the attention of personnel in a variety of ways, which include, but are not limited to:

- Company and site induction.
- Written communication – Health and Safety manual, Safety Alert memos, safety quotations.
- Face to face discussion.
- Health and Safety Committee meetings.
- Team meetings/briefings.
- Notice boards.
- Employee handbook.
- In-house workshops, seminars and other training events.
- Tool box talks.
- Method statements, risk assessments.

Health and Safety Committee meetings are held at least every month, and attendees are taken from a cross-section of the organization to ensure a full and

adequate representation of the workforce. The agenda includes, but is not limited to the following:

- Operational performance.
- Inspection reports.
- Audit information.
- Accident/incident information.

Measurement of outcomes

Eser Contracting and Industry Co. Inc. has been reviewed the changes to maternity and paternity leave, retirement age, and ensured its policies have been revised to reflect the new changes.

Eser Contracting and Industry Co. Inc. employees receive a yearly appraisal where employees and their Line Manager's discuss the past year's performance and developments for the coming year. As per PMS. Any training requirements are identified during these Appraisals. We have a direct communication line between Senior Management and employees through a quarterly news magazine which includes a section that receives employee's suggestions and complaints and directs them to the senior management to take necessary actions. All complaints and suggestions are not printed on the news magazine.

Principle 7, 8 and 9:

Business should support a precautionary approach to environmental challenges

Businesses should undertake initiatives to promote greater environmental responsibility.

Businesses should encourage the development and diffusion of environmentally friendly technologies.

Our commitment

In our commitment to a high level of social responsibility and in spite of the high costs of waste storage and disposal both in financial as well as in environmental and social terms, Eser nevertheless has taken some precautionary approaches we deem as necessary to protect the environment.. Eser Contracting and Industry Co. Inc. sustainability strategy employs the use of best practice environmental principles and confirms the company's intentions to go further than current mandatory requirements on environmental matters in design, product selection and procurement. Building for the future means us making the most effective use of natural resources by designing low energy, low carbon and preferring sustainable materials. Our approach recognizes natural limits and seeks to add economic value at every stage.

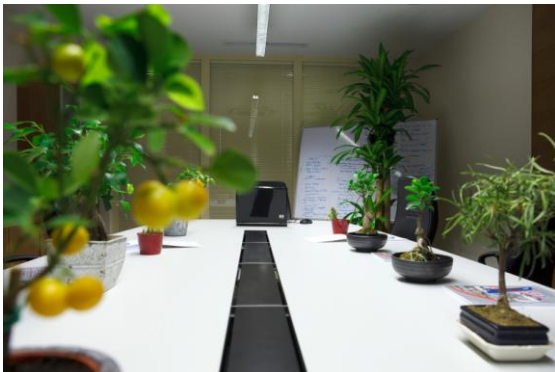
We have extensive experience of assisting the property sector to embrace sustainability and transform their property portfolios. Our expertise covers the complete property lifecycle from the design of new green buildings and guidance on property acquisitions, to the retrofitting of existing assets and

development of strategies to reduce energy use and change behaviors. We recognize that our activities have an impact on the environment, and we are conscious that we must do everything we can to minimize that impact wherever possible and take a leadership role in promoting environmental awareness. Our senior management team has invested in a robust ISO14001 process, setting ambitious targets to reduce carbon, waste and in developing a strategy to add value to our projects.



Our target is to reduce our corporate carbon footprint by 20% by 2015 based on a 2007 baseline and 50% by 2020. We are also developing baseline project data to led the industry in reducing project carbon footprint on all types of work streams. Our expanding environmental team is headed up by a technical manager, who is

responsible for ensuring that our people and our projects benefit from information and advice on innovative products and technology. Our aim is to become a leader in the sustainability arena, and we invest heavily in initiatives and processes to enable us to achieve this. All new projects have an environmental plan, designed in partnership with clients and the community, covering energy, water, waste, biodiversity, localism and community. The implementation of the plan is audited by our environmental team. Our goal is to be recognized as a market leader in the creation of environmentally sustainable communities. We can provide clients and residents with free energy saving advice. Another aim is to pilot carbon monitoring on site and through an effective fuel policy and improved data capture, we have managed to do so. We are also currently undertaking a comprehensive Green Building review. We have joined a number of strategic initiatives to support the achievement of these targets and achieve our vision. The development of initiatives also resulted in the creation and implementation of our Carbon Reduction Action Plan.



The action plan outlines what objectives and actions are in place to achieve our carbon emission reduction target, which is reviewed quarterly and has so far achieved a savings of 250 tons of carbon

since 2009. With regard to achieving logistical efficiencies and reducing carbon emissions from company vehicles, we will ensure that vehicles and equipment used are well maintained, clean and are always operated within legal limits, taking advantage wherever possible of engineering modifications to reduce pollution and emissions, and to save unnecessary consumption of energy. More recently we have progressed to electric vehicles. We also operate a travel plan which aims to reduce car travel and encourage use of public transport and cycling. We encourage the use of renewable technology for our site set ups. Once example is for the temporary offices at Cameroon we installed PV panels. Other initiatives we have implemented Include:

- Use of low energy lighting
- High levels of insulation
- Water usage reduction (train water usage, grey water systems etc.)
- Office paper recycling
- Car sharing schemes
- Local recruitment
- Educating our staff customers and supply chain to change behavior
- Motion sensitive light switches in all of our offices

Within our local environmental plan, we work with schools and community groups to engage the site team and the community in understanding and increasing biodiversity. Our plan also includes risk mitigation and communications on local wildlife and flora/fauna. We have specialist partners who survey key sites and provide recommendations to our site team. Waste management is an important issue for us, not only for the legislative requirements but also for the waste reduction

commitments the company has signed up to. Eser Contracting and Industry Co. Inc. has developed its waste management procedures and planning. A number of waste minimization options have been explored on previous Eser Contracting and Industry Co. Inc. projects, in addition to the selection of waste contractors with high recycling and recovery rates. Examples of some of the waste minimization options Eser Contracting and Industry Co. Inc. have tried previously include;

- Working with our supply chain, requesting minimal packaging with suppliers and taking back packaging, such as returning pallets
- Using rubble waste arising from site clearance as backfill or use as hardcore for access roads and walkways
- Detailed planning - Avoidance over ordering
- Detailed planning - Use of 'just in time' deliveries
- Buy-back for excess materials
- Re-use of site won materials
- Ensuring materials are stored and maintained securely preventing damage and re-ordering
- Waste hierarchy reduce/reuse/recycle etc. on site and awareness of entire team of importance.
- Framework wide initiative sharing to ensure collaborative/continuous improvement of framework

Control of Waste in our Projects' Environments

We develop our designs for built assets with an awareness of the need to reduce construction phase site generated waste though the use of standard sizes and lengths of materials, and through

encouraging the use of off-site pre-fabrication of elements. For example in Sustainable Office Environments Eser Contracting and Industry Co. Inc. promotes multiple sustainability initiatives within the office environment focusing on reuse, recycling, energy consumption and behavioral change.



We encourage our staff to consider their environmental impact and how we can work together sustainably. Our sustainable procurement vision outlines our approach to procuring products and services. Examples of sustainable initiatives are given below. Office Energy Use and Supply: Eser Contracting and Industry Co. Inc. now purchases 20% renewable electricity, where we are responsible for the supply. Energy use data for our main office is made available to staff via our intranet Green Building certificate displayed at the entrance.

Assessment, policy and goals

Eser Contracting and Industry Co. Inc. core business function and objective is to provide a remediation service that contributes to sustainable development through the sustainable regeneration of contaminated brownfield sites and the prevention of pollution. Eser Contracting and Industry Co. Inc. are committed to minimizing the sustainability impacts of

our activities by utilizing our design responsibilities to implement the principles of sustainable remediation. We shall reduce, re-use and recycle waste wherever possible and adopt management practices to contribute towards sustainable future. We have a dedicated Quality, HS and Environmental Representative and various policies such as Quality and Environmental, and Waste Management and Sustainability. We have an integrated management system dedicated to environmental processes and procedures in the company. Our system is accredited to ISO 9001, OHSAS 18001 and ISO 14001. We comply with all relevant environmental legislation, best practice and guidelines. We measure our sustainability impact, set targets and objectives, monitor our legal compliance, and conduct environmental risk assessments for various works activities.

- Quality, HS and Environment policy signed by CEO.
- Quality, HS and Environment Manual - The Quality, HS & Environmental Manual defines the policies, objectives and processes to satisfy ISO 9001: 2008, OHSAS 18001:2007 and 14001:2004 – Quality & Environmental Systems requirements. It also provides focus, direction and the control mechanisms for Eser Contracting and Industry Co. Inc. to manage the quality, HS and environmental systems in line with company business objectives. The Quality, HS & Environmental Management System shall control all Eser Contracting and Industry Co. Inc. activities.
- Environmental aspects register – monitoring taking into account

positive and negative environmental impacts, actual and potential environmental impacts and normal, abnormal and potentially emergency situations.

- Environment legislation register - identified for both office and project based activities. The register identifies all environmental legislation anticipated for remediation and lining activities. The Environmental Legislation Register shall be reviewed on a periodic basis.
- Environmental Forms as part of Integrated Management System – including environmental inspections, dust monitoring, noise monitoring, odor assessment, etc.
- Construction Phase HS and Environmental Management Plan for each site we work on – includes details on the general management of the site, water management, waste management, dust and air emissions, etc.



Implementation

Objectives and targets are set against business activities that have a significant negative environmental impact. We ensure that contaminated land is remediated with minimal environmental impact, in line with

the company's Environmental, Waste & Sustainability Policy.

Eser Contracting and Industry Co. Inc. objectives are to:

- Ensure compliance with all applicable legislative and other requirements, achieving a target of zero legislative non-compliance.
 - Reduce CO2 emissions from company cars.
- Ensure site characterization is done efficiently and effectively and site works are completed in accordance with specification.
- Increase the reuse of materials and reduce the quantities of waste disposed of at landfill
- To prevent the unintentional release of contamination into the substrata and groundwater. Ensure no environmental harm is incurred from spillages of fuel or chemicals used to remediate contaminated ground. A zero spillage target is maintained through the implementation of operational control procedures and best practice for the storage and handling of fuels and chemicals.

Eser Contracting and Industry Co. Inc. operate to an Integrated Management System, accredited to ISO 9001, 14001 and OHSAS 18001.



Measurement of outcomes

Eser Contracting and Industry Co. Inc. has not had any environmental incidents within the last year and has not been subject to any statutory notices or prosecutions.

Eser Contracting and Industry Co. Inc. uses licensed waste companies for the disposal of waste and are registered with a Legal compliance company for the disposal of waste electronic equipment.

Eser Contracting and Industry Co. Inc. has a procedure for dealing with accident/incident investigation as part of its integrated management system. This procedure shall be followed In the event of any Environmental Incidents. This is to ensure that accident/incidents are reported and investigated in accordance with the company's statutory and OHSAS18001 and ISO14001 requirements. Environmental Incidents shall be investigated by QHSE Manager.

Our IMS is internally and externally audited by external auditors.

The current statistics for Eser Contracting and Industry Co. Inc. demonstrate that from 2010 to 2011; the percentage of waste diverted from landfill improved by 12%, and as for the company's improvements compared to the 2009 baseline, Eser Contracting and Industry Co. Inc. had improved by 20%.

In all aspects of design and delivery we aim for continuous improvement in resource efficiency and higher functional suitability (e.g. longer life, more flexibility). This results in higher operational efficiencies with lower environmental impact and low waste.

Principle 10: Anti-corruption

Business should work against corruption in all its forms including extortion and bribery

Our commitment

We at Eser Contracting and Industry Co. Inc. are committed to ensuring our business is conducted in accordance with rigorous ethical, professional and legal standards.

Eser Contracting and Industry Co. Inc. has a zero tolerance policy towards corruption and bribery. We have a number of policies to support this including an anti-corruption policy and ethics policy. This is communicated throughout our procedures including our induction process. We have a requirement for all members of staff to complete an authorization form with regard to entertainment or gifts. This has enabled us to control and monitor any form of potential corruption.



Our Ethical Standards Policy, defines our core objectives as to:

- commit to acting honorably and with integrity in all its business dealings
- ensure that no financial or other inducements to gain or retain work are offered or accepted by or on behalf of Eser Contracting and Industry Co. Inc.

- endeavor to raise the ethical standards of global business in the market in which we operate
- provide such training, advice, information as may be necessary to personnel at all levels
- integrate ethical considerations into our design and business decisions
- provide pro bono services where appropriate and engage with the wider community. Indicators

- Zero offences for corruption or bribery in the firm.
- 100% of new employees received the key speech, setting out our guiding values and principles.
- All staff are required to complete the e-learning ethics training course.

Assessment, policy and goals

One of the Company's core values is to uphold sound, responsible and fair business operations. It is committed to promoting and maintaining the highest possible ethical standards in relation to all of its business activities. The Company's reputation for maintaining lawful business practices is of paramount importance to it and this policy is designed to preserve these values. The Company therefore has a zero tolerance policy towards any form of corruption, including bribery.

Eser Contracting and Industry Co. Inc. ensures compliance with anti-bribery laws, rules and regulations, not just within the UK, but also in any other country within which the Company may carry out its

business or in relation to which its business may be connected. Eser Contracting and Industry Co. Inc. enforce full policies on anti-bribery, corporate hospitality and the receipt of gifts.

Eser Contracting and Industry Co. Inc. support the UN Convention Against Corruption.

Eser Contracting and Industry Co. Inc. has, signed by the Managing Director, policies on anti-bribery, the receipt of gifts and corporate hospitality.

These policies are included in all employee inductions and are communicated to employees on a regular basis. The policies:

1. Provide suitable and secure reporting and communication channels and ensures that any information that is reported is properly and effectively dealt with.
2. Create and maintain a rigorous and effective framework for dealing with any suspected instances of bribery or other unethical conduct.

The Board of Directors have overall responsibility for ensuring these policies comply with the Company's legal and ethical obligations, and all Directors, employees and associated persons are expected to adhere to the principles set out in these policies.

Breaches of any of the provisions of these policies constitute a disciplinary offence and are dealt with in accordance with the Company's disciplinary procedure.

Depending on the gravity of the offence, it may be treated as gross misconduct and could render the Director, employee liable to summary dismissal.

In the event that someone wishes to report an instance or suspected instance of bribery, they are to follow the steps set out in the Company's Policy.

Confidentiality is maintained during the

investigation to the extent that this is practical and appropriate in the circumstances. The Company is committed to taking appropriate action against bribery or other unethical conduct. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The Company's Anti-Corruption Officer has lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. They are responsible for monitoring its effectiveness and provide regular reports in this regard to the Directors of the Company.



Implementation

Communication to all employees on Anti-Bribery, Corporate Hospitality, and the Receipt of Gifts policies. This is in the form of policies discussed at employee inductions and emails sent to the company reminding them of their duties.

Measurement of outcomes

Eser Contracting and Industry Co. Inc. have not been involved in any legal cases, rulings or other events relating to corruption and bribery.

Policy

Employees are reminded that if in doubt as to what might amount to bribery or other unethical conduct or might constitute a breach of this policy, they should refer the matter to the Company's board or line manager. Breach of any of the provisions of this policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the Director, or employee liable to summary dismissal. It is the contractual duty and responsibility of all Directors, Employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this policy and to prevent, detect and report any suspected bribery, fraud or corruption in accordance with the procedure set out in the Company's Public Interest Disclosure Policy. They must immediately disclose to the Company any knowledge or suspicion they may have that they, or any other director, employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company. For the avoidance of doubt, this includes reporting their own wrongdoing. The Company encourages all Directors, Employees and associated persons to be vigilant and to report any inappropriate conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously.

