



GOVERNANCE

ECOSYSTEM

SOCIAL

NUROL YES
SUSTAINABILITY REPORT
2019



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THE FOCUS OF NUROL'S ACTIVITIES IS TECHNOLOGICAL AND INDUSTRIAL INFRASTRUCTURE PROJECTS. ITS WIDE EXPERTISE AS A CONTRACTOR HAS AN IMPORTANT PART IN ITS SUCCESS IN DELIVERING LARGE SIZE INFRASTRUCTURE PROJECTS ALL AROUND THE WORLD.

ABOUT THE REPORT

Nurol Construction and Trading Co. Inc. (Nurol Construction), one of the leading companies of its sector, conducts operations globally in construction industry and was established in Ankara on 1966. Nurol Construction has engaged in the construction of infrastructure and superstructure projects, metros, railways, motorways, tunnels, viaducts, suspension bridges, dams, hydroelectric power plants, hotels, residential complexes, stadiums and turnkey industrial facilities. In 2015 Nurol Construction moved its HQ from Ankara to İstanbul. The company is a member of Nurol Group Companies. The principal shareholder is "Nurol Holding A.Ş." and is ultimately controlled by the "Çarmıklı" family. Together with more than 11.000 employees, the company has various on-going and completed domestic and overseas projects that you can find details in this report.

As Nurol Construction family, we aim to transform our way of doing business with regard to sustainability principles by managing our environmental and social risks

at the projects we carry out. In 2017, we signed the Global Compact in order to announce this perspective to our stakeholders. We shared our 2018 environmental and social performances with you through our NUROL YES Sustainability Report. Following our first report, we share with you our second report, which contains activities we carried out in above-mentioned areas in 2019, our practices on priority issues that are crucial for our stakeholders and our continuous improvement approach that we adopted as a principle in the field of sustainability.

With our report titled as "Nurol YES Sustainability Report", we share our objective and performances for effective governance towards the dimensions of sustainability, protection of healthy ecosystem, formation of happy and balanced individuals and societies in social life. In other words, we take a supportive stance to sustainability and say "YES" to the efforts that supports it.



COMPLIANCE TO UNGC AND GRI STANDARDS

Our report is prepared in accordance with the United Nations Global Compact (UNGC) - to which Nurol is a signatory - Progress Report and Global Reporting Initiative (GRI) Standards: Foundation. We believe that our report will support and elevate us to higher standards, more effective stakeholder dialogue, happier employees and a healthier tomorrow.

This report is prepared with the coordination of **Nurol Construction Integrated Management Systems** Department.



SCOPE OF THE REPORT

Our Sustainability Report (shortly 'Our Report' or "the Report") is the second sustainability report prepared and published, covering the numeric data of our performance and actions on **governance, economy, environment, social and ethical affairs** for January 1 and December 31, 2019 period. Unless otherwise stated, time period expressed as the "reporting period" reflects either the period between January 1, 2019 and December 31, 2019 or the existing situation as of December 31, 2019



REPORTING LIMITS

The report includes actions and data about governance, environment, occupational health and safety, ethics, economic and social subjects. The said information belongs to domestic and international projects conducted solely by Nurol Construction Headquarter (HQ) and Nurol Construction. All ongoing projects mentioned or not mentioned herein this report are stated in the Corporate Profile section. 'Our Projects' and 'Projects included in the report' refer to the aforementioned projects.

The projects conducted by Nurol Construction in partnership with other companies are not included in this report, because Nurol Construction is not the sole owner of the project and may not have the means to fully maintain its standards.

Economic and financial indicators encompass the companies which are included in consolidated reports; the said companies are accessible under Corporate Profile. Financial information shared in Financial Outlook part is audited by independent third parties.

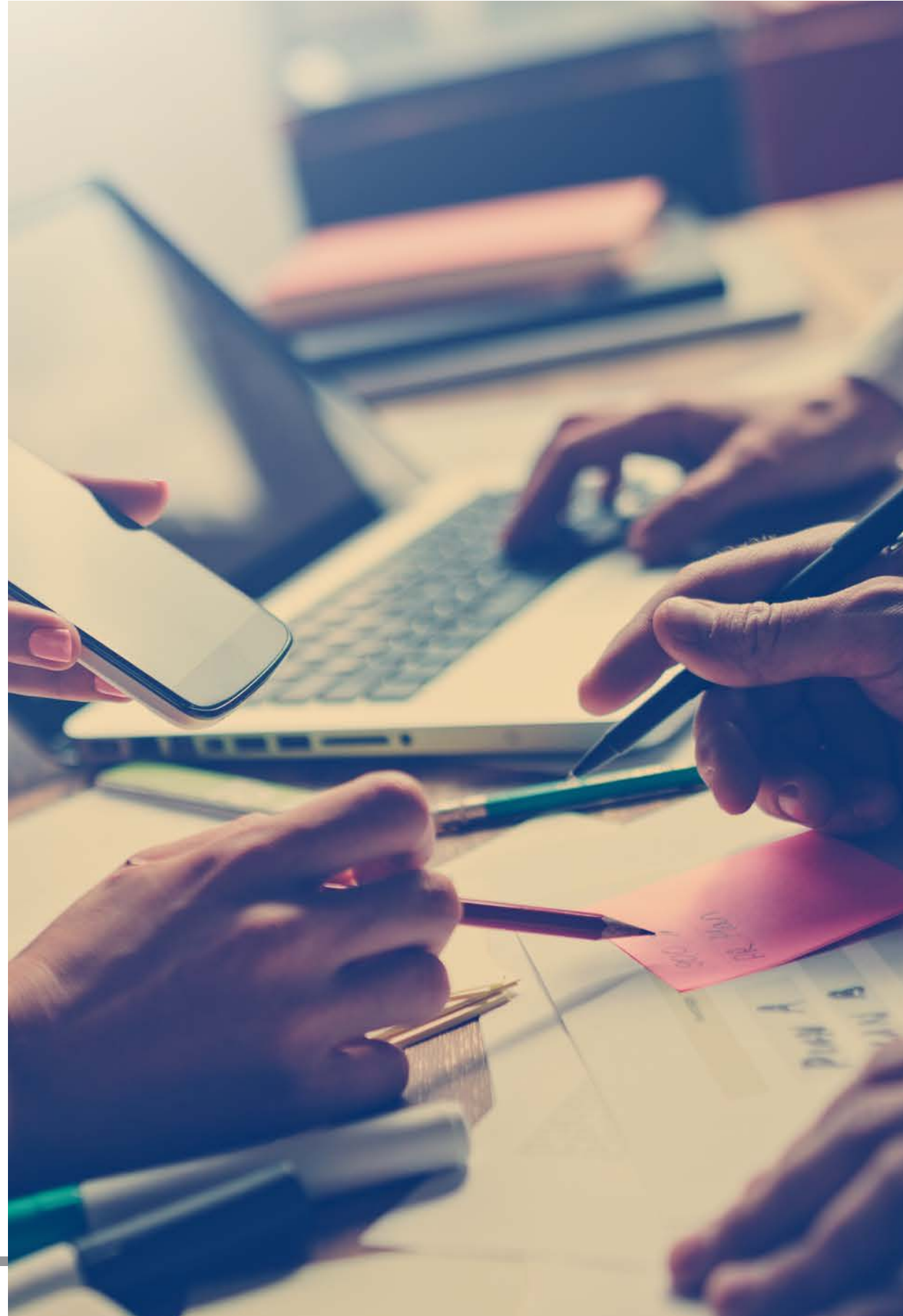


FEEDBACK

We have prepared our sustainability report in order to support our development in this regard and as a periodic communication platform with our stakeholders. We aim to publish the report on an annual basis and continuously improve its content. We will be glad to hear from you through all communication mediums, especially by e-mail, for any contribution, comment and questions for related topics.

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MESSAGE FROM GENERAL MANAGER

Dear Stakeholders,

With our second Nurol YES Sustainability Report, we once again share the sustainability performance of Nurol Construction with you. We have reflected our sustainability strategies, which are developed by synthesizing our long-established corporate tradition and universal sustainability principles, to our report. In addition to climate change, political crises, global economic and social developments, the pandemic that we struggle on a global scale has had an important impact not only on societies but also on the business world. In the light of these latest developments, the importance of achieving economic and social development in harmony with the natural environment has become more apparent. From this perspective, as in the whole world, we are reviewing our future plans and rapidly implementing action plans suitable for the continuity of the business.

In 2017, Nurol Construction entered into the world's most inclusive sustainability platform by signing the UN Global Compact. As a part of this initiative, we aimed to contribute to the formation of a common culture in the business world and especially in the construction sector within the framework of universal principles. We are publishing the second of **our NUROL YES (Governance - Ecosystem - Social) Sustainability Report**, which is prepared both in accordance with the **UNGC Progress Reporting** standards and the **Global Reporting Initiative (GRI) Standards**. I would like to express my gratitude to all who contributed to the preparation of this report and who are engaged in sustainability efforts.

We continued our endeavors which were already in accordance with the United Nations Sustainable Development Goals in line with the principles of continuous improvement in 2019. Although our reporting includes 2019 performance, we would like to inform you about current developments. We signed the "UN Women's Empowerment Principles (WEPs)", which focuses on gender equality and which is among our sustainable development goals, in February 2020 and then we joined the 30% club. We approach the issue of "Gender Equality" not only as a women's rights issue but also within the scope of universal human rights. We aim to be one of the leading companies in our sector by implementing good practices in this field through creating gender-free equality of opportunity in our company.

We are aware of the importance of dialogue platforms with our stakeholders. We know that establishing a transparent and effective dialogue will play a key role in this process. We focus on our environmental and social risks in cooperation with our stakeholders for the continuity and continuous improvement of our sustainability performance. We have shaped our priority issues again this year with our stakeholders. We have reviewed our current situation, processes, performance and goals in Governance - Ecosystem - Social areas with our updated priority issues. We care about the feedback of our stakeholders for our development in terms of sustainability and we include them in our processes.

In line with our principal stance on human rights and anti-corruption issues, we continue our works in all geographies we operate in, taking into account the cultural and ethical requirements as well as the goal of

providing development in social and environmental areas. It is very important for us to see that the activities we conduct create positive and permanent outputs in our geographies. In addition to specifying our conditions and expectations so that our subcontractors and suppliers we work with should pay attention to these issues, we regularly review our subcontractors and suppliers on social and environmental issues.

As Nurol Construction, our sustainability journey which we started with the aim of creating value that respects nature and people, continues unabated with sustainability works as well as important projects we have carried out since our establishment. With this in mind, the understanding of peaceful management with nature and people is among our basic principles. We will continue to be among the enterprises that serve nature, as we have done until now. Some of the areas that our contributions focus on in line with our sustainability strategy, the details of which you will find in our report are; Climate Action, Accessible and Clean Energy, Clean Water and Sanitary Conditions, and Sustainable Cities and Living Spaces.

Nurol Construction provides significant social contributions with its infrastructure projects to the geographies where it operates. It contributes to development with its transportation facilities, supports agricultural activities with its projects contributing to irrigation, and increases tourism and trade opportunities. It supports universal and fair access to safe and affordable drinking water for everyone in clean water supply projects. In addition to realizing these projects, we focus on solid **Governance** structure, protection of the **Ecosystem** and strengthening the **Social** dimension in order to make our contribution to sustainable development.

In the recent years spent on developing collaborations with international financial institutions, we have shaped our management system to meet the environmental and social requirements of banks. We also meet the Employer requirements of potential projects in different geographies we are present, within the framework of sustainability, we see that these areas are among our strengths as Nurol Construction.

As the flagship of Nurol Group Companies, we are heading towards our goals by developing our company every year in line with the principle of continuous improvement, being a company that leads change, respects human rights and ethical values and having made it all a way of doing business. In these exceptional times, we assess meticulously how Nurol Construction's creativity and capabilities will contribute to our society and our industry. Our activities continue with a deep commitment to our role and social responsibilities. Our 2019 Nurol YES Sustainability Report reflects our commitment to principles that will ensure the longevity and sustainability of our organization and stakeholders.

This process, which creates a positive difference for a more livable social and physical environment, could not be achieved without the support, belief and effort of our valuable colleagues and you, our valuable stakeholders, who have always been with us in our sustainability efforts. On this occasion, I would like to thank our employees, business partners, employers and all our stakeholders.

NURETTİN AKDENİZ
NUROL CONSTRUCTION
GENERAL MANAGER



CORPORATE PROFILE

Corporate Profile

Our Vision, Mission, Corporate Values and Policies

Vision
Mission
Corporate Values
Our Policies

Operational Mapping

Projects: On-Going and in the Scope of Report

Projects: On-Going and out of the Scope of Report



OUR REPUTATION STEMMING FROM OUR HISTORY OF OVER 50 YEARS HAS BEEN BUILT ON QUALITY AND TRUST. OUR COMMITMENT IS; TO DELIVER ALL PROJECTS FAULTLESSLY AND ON TIME, TO PROVIDE STRONG AND QUALIFIED OUTPUT, TO PRODUCE THE MOST RELIABLE GOODS AND SERVICES.

DETAILED
INFO

Nurol Construction Ongoing Projects: <https://www.nurolinsaat.com.tr/en/ongoing-projects>
Nurol Construction Completed Projects: <https://www.nurolinsaat.com.tr/en/completed-projects>

ABOUT NUROL CONSTRUCTION

As a result of its global contributions to construction and contracting sector, Nurol Construction (Nurol Construction and Trading Co. Inc.) with its deep-rooted company culture and experienced staff earned many reputable references and successfully completed infrastructure projects for motorways, bridges, viaducts, tunnels and dams as well as superstructure projects for industrial facilities, hotels, shopping malls and residential.

The company is a member of Nurol Group Companies. The main shareholder is 'Nurol Holding A.Ş.', and it is controlled by 'Çarmıklı' family members. It was established in 1966 in Ankara and moved its HQ to Istanbul in 2015. It contributed to agriculture and heavy industry with irrigation and turnkey industrial plant projects during the establishment period. Utilizing effective and innovative technology in all projects, in 1976, Nurol Construction became a pioneer in the sector with Ayas Tunnel project by implementing New Austria Tunneling Method technology in Turkey for the first time ever.

Dedicated to applying proper architectural and engineering solutions in line with contemporary necessities at all times and in all projects, Nurol Construction completed satellite town and luxury estate projects which have been globally and locally appreciated in terms of design and quality.

The nearly completed Ilisu Dam and Hydro-Electric Power Plant project is Turkey's second largest dam with 11 billion m³ reservoir, 1.200 MW installed capacity and annual 4,1 billion kWh energy production capacity. The dam will contribute to reduction of Turkey's energy deficit.

Bosphorus Tube Tunnel Crossing Project (MARMARAY) connected two sides of İstanbul by utilizing cutting edge technology with a railway line 60 meters under sea level.

Nurol Construction completed projects making Turkish citizens proud using latest technology, design-oriented engineering solutions and %100 local labor force.

As the largest Build-Operate-Transfer Project in the history of the Republic of Turkey with a total value of \$7,5 billion, the Gebze-Orhangazi-Izmir Motorway reduced travelling time between Istanbul and Izmir from 9 to 3,5 hours. The Osmangazi Bridge, as the

most important part of the project, is the second longest bridge in Europe and the fourth longest bridge in the world with its 1.550 m central span and total length of 2.907 m including its connection decks. The 1.372 m-long Southern Approach Viaduct that connects the southern piers of the Osmangazi Bridge to the motorway contains a total of 33.000 tons of steel, and set a world record in the quantity as the first 22.500-ton steel structure to be completed through the incremental launching method at a length of 1.123 m, while a Turkish record was set when the last deck weighing 2.600 tons was hoisted into position.

Starting our construction journey in North Africa with Algeria, we expanded to Morocco. In this area, we are running infrastructure projects such as dams, bridges and motorways.

Gulf countries have a crucial role in overseas activities of Nurol Group Companies.

Within the scope of ongoing projects in UAE, under the employership of leading investors of the region, total residence construction area built in scope of satellite towns exceeded 500.000 m². Infrastructure and technological steel construction projects were added to our references as well.

Furthermore, in Abu Dhabi, we conduct sea bridge connections and canals, various infrastructure projects for bridges and tunnels and luxury hotel and residence building projects.

Nurol Construction proudly appears in 'ENR World's Biggest Contractors List' for the last fifteen years.

NUROL Real Estate Investment Trust Inc., which stands out with its significant investments among other companies of our Group of Companies that serves in the construction and contracting sector, continues residential and office projects in Istanbul (NUROL Park, NUROL Tower, NUROL Life) and transfers its experiences in land development, project design, construction and marketing to the sector. Following the IPO in 1999, Nurol Real Estate Investment Trust Inc. quoted on the Istanbul Stock Exchange.[A1]

Nurol Construction's ongoing and completed projects total value is approximately US \$25 billion.

ORGANIZATION PERSON

ÇARMIKLI
Family Members
%0,10
Capital Share
467.000

NUROL Holding
%99,90
Capital Share
445.004.000

Total
Employment
+11.000
Employees

Net
Sales
4,20
Billion TL

Total
Project Amount
25
\$ Billion

Total
Construction Area
3,6
Million m²

Total
Road Construction
1.500
Km+

Total
HEPP Capacity
1.900
MW+

Total
Tunnel Construction
110
Km+

Villa and
Housing
14.000
Piece+



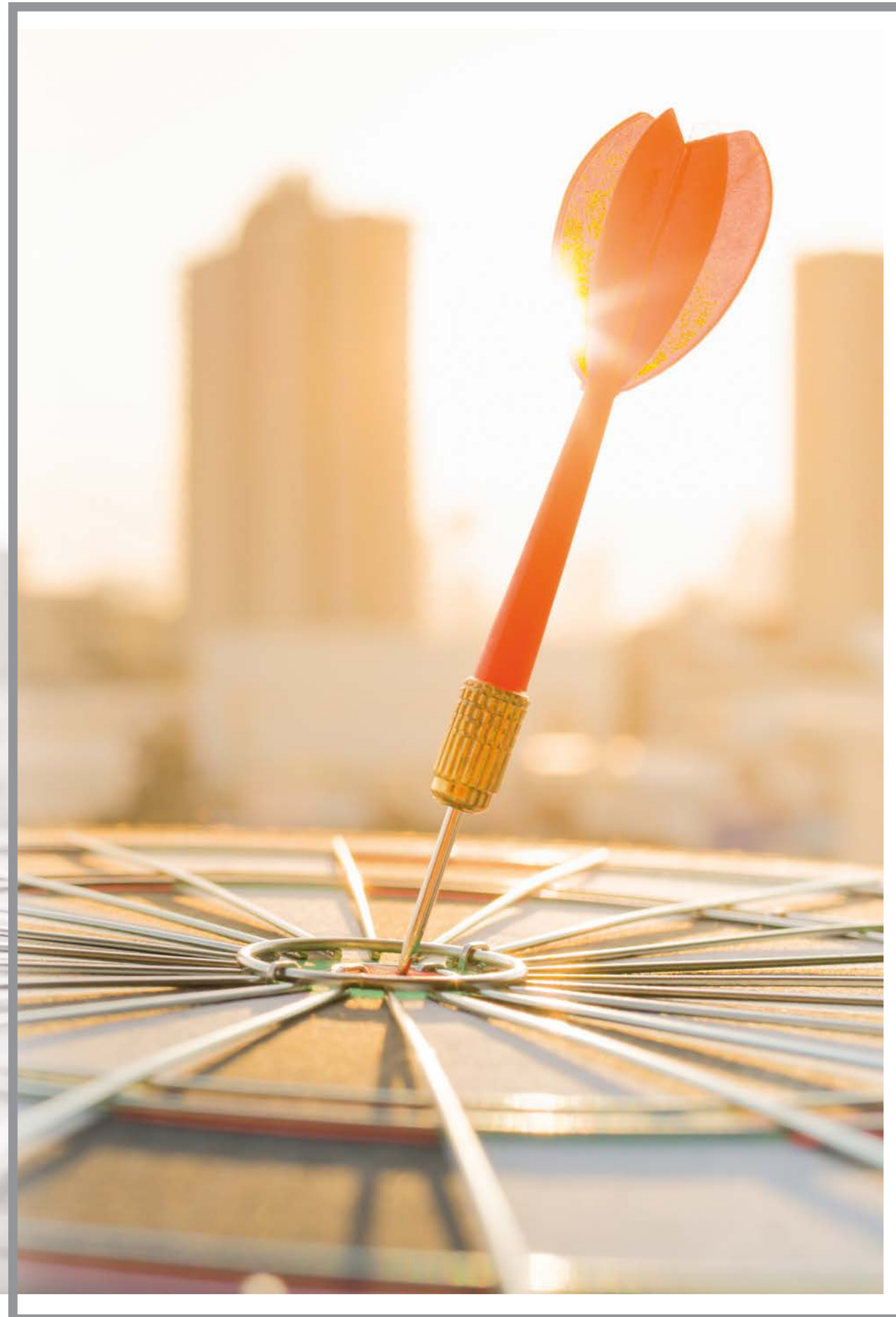
VISION

As Nuro! Family, we are aware of our responsibilities. Our objective is to become the best by being recognized with our quality in industries we operate and to create highest social and economic value for our country.



MISSION

Producing the best goods and services under solid principles relying on our 50+ years of local and global experience and expertise, acting innovative while keeping conventionality and taking those values to next generations with the strength we take from our employees and society.



CORPORATE VALUES



QUALITY, RELIABILITY, DIGNITY

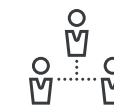
Dating back to a renowned history of over half a century, our dignity is based on quality and reliability. **Our commitment** is to deliver all of our projects flawlessly and on time; to create durable and qualified work and **to produce the most reliable goods and services.**

While achieving our commitment, we never make a compromise on honesty, consistency and stability. Our fundamental driving principle is to work continuously, to aim the highest accomplishments and to progress **further and further.**



CONVENTIONALITY AND INNOVATION

Under half a century old strong roof, **tradition and innovation** are integrated seamlessly. We create our future by carefully placing contemporary and progressive approaches on the basis of our deep rooted and lasting values. Through our continuous learning and progressing structure, we work hard for providing visible contributions to our workers, business partners and clients.



EQUALITY, FAIRNESS, FIDELITY

Even the smallest of our accomplishments is too great to be the work of a single person. Considering the fact that, people can only accomplish great things by trusting and relying on each other, our managers and all the workers within our group have been interlocked as a family. All the members of Nuro! Family have a strong team spirit based on a constituent comprised of affection-respect-devotion.



SOCIAL BENEFIT

With the awareness of being a part of society, we give an utmost care to our corporate targets to be in tune with the interests of the country and the society. In order to create a sustainable future, **we determine our responsibilities in** social and **social awareness** and fulfill them in the **most beneficial way.**



RESPECT TO ENVIRONMENT

One of the core principles of our corporate culture is to act due to the awareness that giving **priority to increase quality of life quality of next generations** can only be accomplished by preserving the nature and helping the ecological system **in all our business processes.**

OUR POLICIES



QUALITY
POLICY

The prior objective of Nurol Construction and Trading Co. Inc. as a commercial entity and for each company member, is to serve at the highest service standards and to provide unlimited Client satisfaction. Excellency is not a choice but a must of our business and our main goal is to reach this objective. We herewith commit the execution of principles given here-below at each field we have activities:

- Covering the requirements of our leading role in the quality issue;
- By providing design, laborship and service quality through each product, reaching the highest quality level;
- By covering the quality issues in internal communication, providing of precious integrated team work;
- By giving the priority to the quality issues in the internal training programs, bringing the individual improvement of each member to a level convenient to moderate requirements;
- By the execution of individual liabilities completely, reaching to the quality objectives;
- Carrying out necessary activities for continuous improvement the effectiveness of the Quality Management System;
- Covering the necessities of legal, regulatory and Client's contractual requirements exclusively.



ENVIRONMENTAL
POLICY

Nurol Construction and Trading Co. Inc. aimed at the protection of natural environment, while conducting its production activities at top quality level. In this respect, we confirm that we will realize the principles given-below, related with the environment we borrowed from future generations, in every area we have activities:

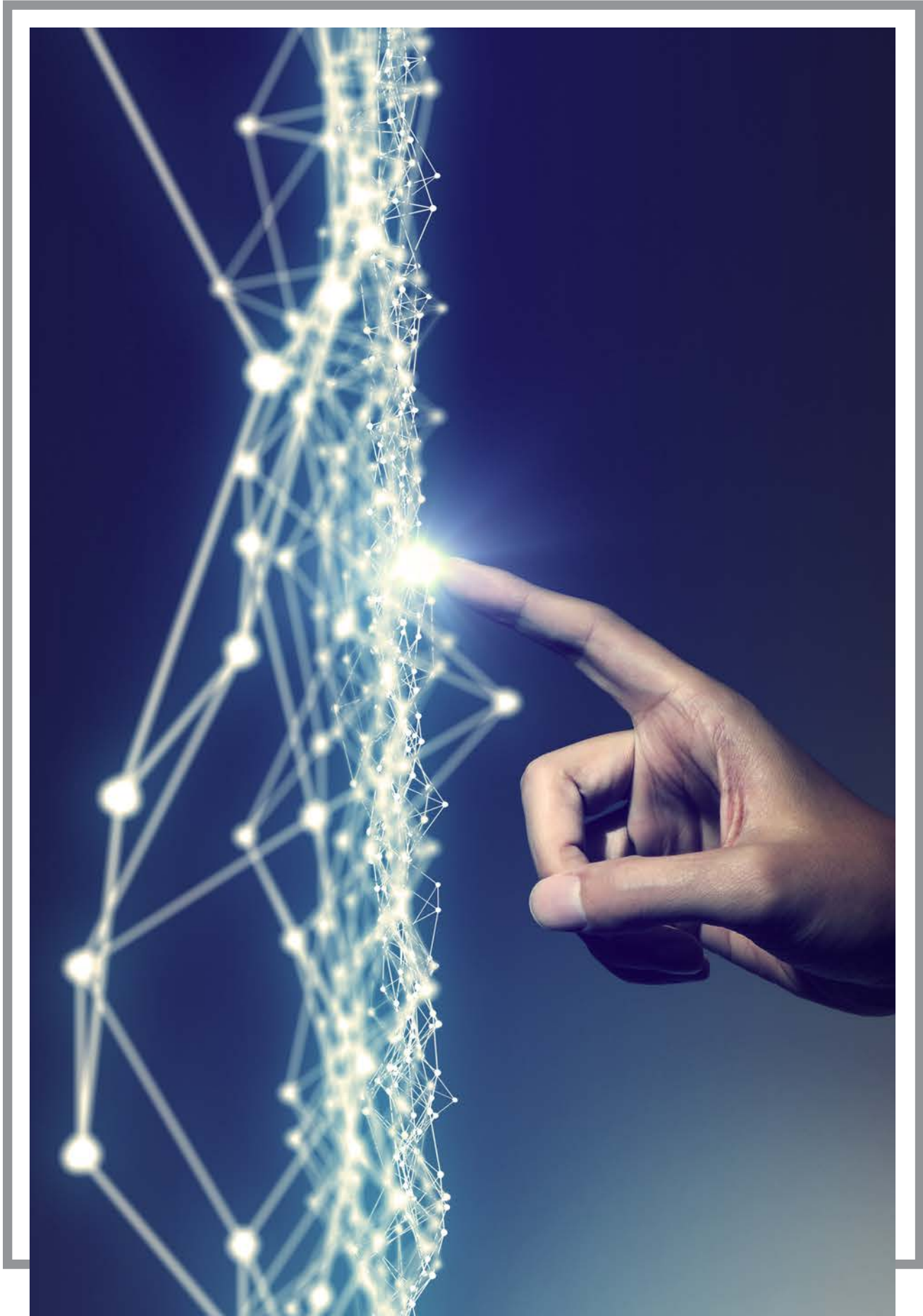
- To prevent air, water, soil pollution in a continuous improvement manner,
- To comply with the legal legislation about environment, administrative regulations and the rules that should naturally be obeyed,
- To provide execution of design activities with minimum environmental affects,
- In situations when conditions cannot be interfered, not participating in the production activities which may have significant and negative effects on environment,
- Within the framework of engineering principles, using environment friendly inputs throughout our activities,
- To share the acquired environmental experiences with public, private sector corporations and non-governmental organizations mutually,
- In scope of production activities, to spend excessive emphasis on the utilizing of natural resources in the most effective way, the provisions of source saving and recycling,
- To provide the necessary training and education programs for bringing all our staff, suppliers and subcontractors to the required level of environmental consciousness.



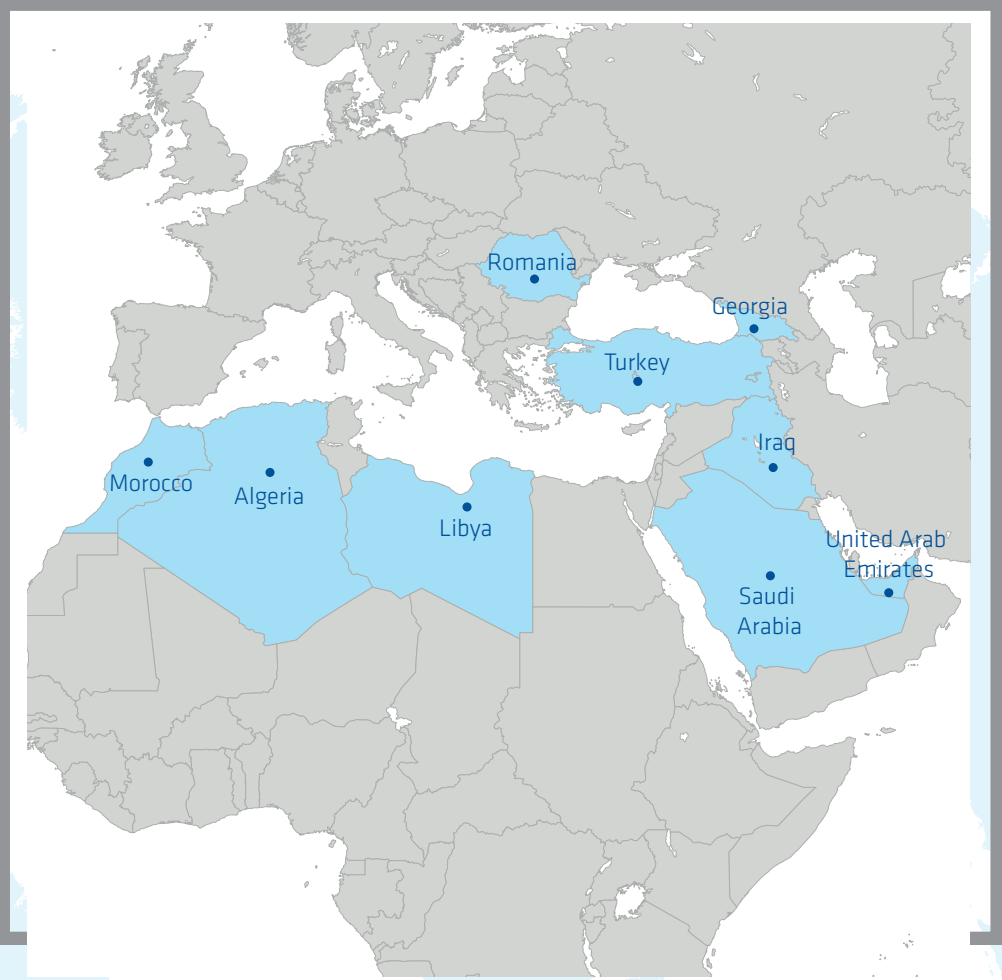
OCCUPATIONAL HEALTH
AND SAFETY POLICY

In conducting its activities of production at the highest level of quality, Nurol Construction and Trading Co. Inc. considers the issue of unexceptional protection of occupational health and safety of its employers and continuous improvement of the working environment as one of its main targets. In this context, we commit ourselves to provide and maintain the following conditions:

- Provision of elimination of occupational health and safety risks through preventive actions,
- Provision of continuous improvement as regards to OHS issues,
- Strictly obeying the applicable OHS legislation in force, administrative regulations and conditions of subscribed organizations,
- Improving participation and consultation procedures of our OHS Management System and ensuring the involvement of all our personnel in these processes,
- Provision of training so as to make both direct company personnel and the employees of subcontractors aware of their individual OHS responsibilities,
- Periodic review of OHS Policy so as to maintain compliance with conditions,
- Reciprocal exchange of OHS experience acquired with public, private sector entities and non-governmental organisations.



OPERATIONAL MAPPING



Romania

Efforts to establish Nuro Construction Romania office started in 2017 and were completed in early 2018. Business development activities, especially for infrastructure projects, continued throughout 2019.

Morocco

Nuro Construction Morocco office, established at the beginning of 2012 for the construction of El Jadida Safi Motorway Lot 364 Project. Business development efforts are continued in the region after the final acceptance of the project in 2017.

Algeria

The ongoing projects under Nuro Construction Algeria, which was established in 2003, are as follows by the end of 2019:

Souk Tleta Dam Project,
Boukhroufa Dam Project,
Tizi Ouzou Motorway Project.

Turkey

Our ongoing projects as of the end of 2019 in our country where we have been operating since 1966;

Gebze - Orhangazi - İzmir Motorway Project,
Balıkesir - Kırkağaç - Akhisar Section Project,
Ilisu Dam and Hydroelectric Power Plant Project,
Hasankeyf Group Bridges Project,
Ordu Ring Road Supplementary Works Project,

Eyiste Viaduct Project,
Yusufeli Dam Bridges Project,
Silifke-Mut Road Project,
Ümraniye-Ataşehir Göztepe Metro Project,
Yeşilyaka Project.

Georgia

Nuro Georgia was established in Batumi, Georgia in April 2007 to operate in the construction sector. Nuro Georgia has completed the construction of the Ministry of Internal Affairs building in Tbilisi, Sheraton Hotel in Batumi and headquarters of Nuro Georgia. The construction of Batum Sheraton Hotel was completed in 2010 and Nuro Georgia currently manages its operations as well. Nuro Construction Georgia completed Paravani Hydroelectric Power Plant Regulator, Valve Room, Central Building Construction and Procurement of Hydromechanics Equipment Project in 2015.

Saudi Arabia

Nuro Construction Saudi Arabia was established in 2010 and took license for infrastructure systems, building and premises, clean water and waste-water systems construction, electric and electro-mechanics projects and road building.

United Arab Emirates

Nuro U.A.E. was established on April 2003 in Abu Dhabi, the capital city of the United Arab Emirates as a local company. Dubai branch was opened in 2004. The main purpose of the company is to evaluate the potential in the construction sector in the region and operate in voluminous projects.

Corniche Tower Building Project	(Abu Dhabi)	P32 Parcel Dubai Gulf Building Project	(Dubai)
P20 The Cove Dubai Gulf Building Project	(Dubai)	GA14 Golf View Villas Project	(Dubai)
GA09 Golf View Apartment Building Project	(Dubai)	Beach Vista Towers Project	(Dubai)

Iraq

The Branch located in the Iraqi city of Sulaymaniyah in the region of Piramagrun has a silo complex with a capacity of 80.000 tons and 12 warehouse buildings. Final acceptance is made in the project.

COUNTRY OFFICES

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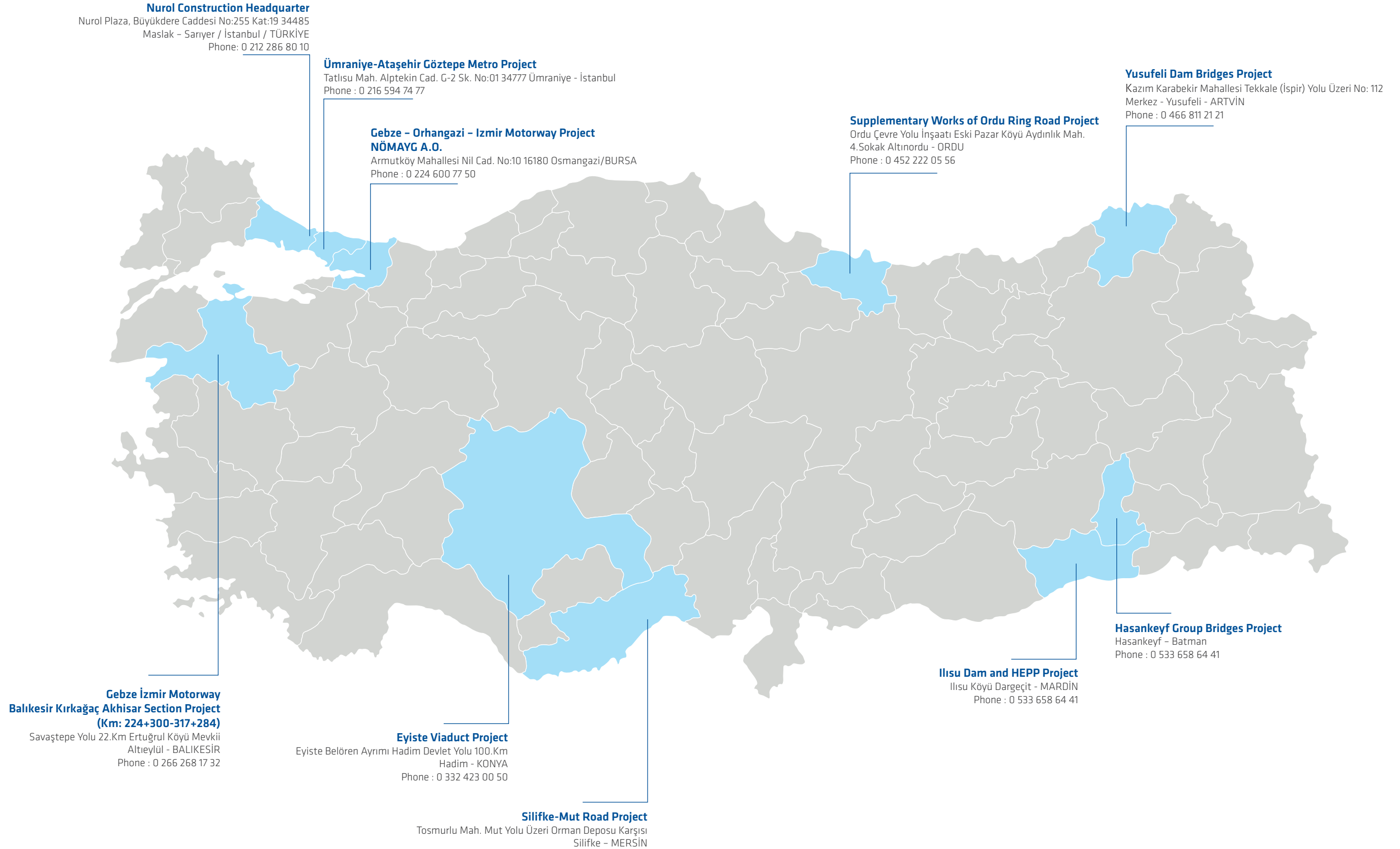
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OPERATIONAL MAPPING



PROJECTS: ON-GOING AND IN THE SCOPE OF REPORT

Some of the ongoing projects included in our 2019 report along with headquarters of Nurol Construction are; Gebze-İzmir Motorway Balıkesir Kırkağaç Akhisar Section Project, Konya Eyiste Viaduct Project, Algeria Souk Tleta Dam Project and Algeria Boukhroufa Dam Project. While choosing which projects are to be included in this report, projects that are not partnerships and in which we effectively demonstrate our management capabilities were preferred. The environmental, social and economic performances of these projects clearly reflect Nurol Construction's approach to sustainability issues. We are trying to reflect more and more of our perspective and the culture of Nurol Construction on our projects every day. While we are planning for 2020 reporting, we aim to include our projects that are managed by partnerships. Our Gebze-İzmir Motorway Balıkesir Kırkağaç Akhisar Section Project, which had an important place in the 2018 and 2019 reports, will not be included in the 2020 report since it was completed in 2019.

GEBZE-ORHANGAZI-İZMİR MOTORWAY BALIKESİR-KIRKAĞAÇ-AKHISAR SECTION PROJECT (BALIKESİR MOTORWAY PROJECT)

Pursuant to the implementation contract signed on September 2010 which became effective as of March 2013 between General Directorate for Motorway and Otoyol Yatırım ve İşletme A.Ş.; Nurol Construction is the contractor of the project and has completed the Balıkesir - Kırkağaç - Akhisar Section construction which is a part of second phase of Gebze - İzmir Motorway project. Within the scope of the project, there are total of 6 viaducts, 61 bridges, 58 underpasses and 202 culverts with a 93 km motorway.

1 maintenance operation center, 5 toll booths, 5 junctions and 3 motorway service facilities were built throughout the section.

In 2019, for the project:

- 1.065.253 m³ cut excavation
- 678.789 m³ filling works
- 9.154 m grading works
- 28.650 m³ reinforced concrete
- 829.584 tons of superstructure cold mix production
- 779.919 tons of superstructure hot mix production completed.

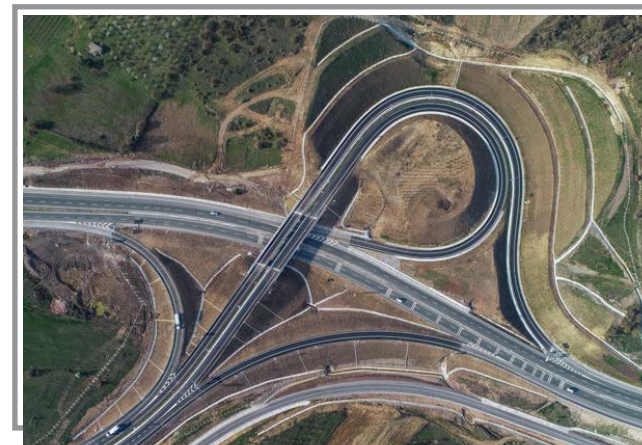
The project was opened to traffic in August 2019.



In 2019, for the project:

- 2.214 m bored pile works
- 13.620 m³ reinforced concrete
- 3.737 tons of reinforcement production completed.

Expected project completion: December 2022.



In the project as of the end of 2019, total:

- 35.586.239 m³ cut excavation
- 27.530.657 m³ filling works
- 87.902 m grading works
- 657.911 m³ reinforced concrete
- 4.347.945 tons of superstructure cold mix production
- 2.251.956 tons of superstructure hot mix production completed.

KONYA EYİSTE VIADUCT PROJECT

The tender related to the Eyiste Viaduct has been carried out by General Directorate of Motorway. The contract has been awarded to Nurol Construction by end of 2016. Within the scope of the project, a viaduct with a total length of 1.372 meters and a width of 25 meters will be constructed; and it will be one of the world's biggest balanced cantilever viaducts. The superstructure will be constructed on 2 abutments and 8 piers with varying heights between 31 meters and 155 meters.

In the project as of the end of 2019, total:

- 129.391 m³ cut excavation
- 6.034 m bored pile works
- 83.693 m³ reinforced concrete
- 17.950 tons of reinforcement production completed.

ALGERIA BOUKHROUFA DAM PROJECT

Boukhroufa Dam is under construction by Nurol Construction at the El Tarf province of Algeria. It is located on the Boukhroufa Stream, 9 km south of the Bouteldja city, to provide 125 hm³ of irrigation water for agricultural lands in the region. The dam is a clay core earth fill dam and will be 87 m high from the foundation. Once completed, its reservoir will have 86.000.000 m³ capacity.



In 2019, for the project:

- 55.589 m³ cut excavation
- 939.218 m³ filling works
- 1.820 m³ reinforced concrete production completed.

In the project as of the end of 2019, total:

- 1.937.029 m³ cut excavation
- 2.781.042 m³ filling works
- 37.442 m³ reinforced concrete production completed.

Expected project completion: August 2021.

ALGERIA SOUK TLETA DAM PROJESİ

Souk Tleta Dam is under construction by Nurol Construction at the Tizi Ouzou province of Algeria. It is located on the Bougdoura Stream, 8 km south of the Draa Ben Khedda city, to provide 90 hm³ of irrigation and drinking water for Tizi Ouzou and Boumerdes regions. The dam is a clay core earth fill dam and it will be 95 m high from the foundation, once completed its reservoir will have 90.000.000 m³ capacity.



In 2019, for the project:

- 183.940 m³ cut excavation
- 14.200 m³ filling works
- 8.381 m³ injection works
- 25.362 m³ reinforced concrete production completed.

In the project as of the end of 2019, total:

- 1.520.396 m³ cut excavation
- 297.450 m³ filling works
- 8.381 m³ injection works
- 103.083 m³ reinforced concrete production completed.

Expected project completion: March 2022.

PROJECTS: ON-GOING AND OUT OF THE SCOPE OF REPORT

GEBZE – ORHANGAZI – İZMİR MOTORWAY PROJECT



As per the Implementation Contract signed on 27 September 2010 between the General Directorate of Motorway and Otoyol Yatırım ve İşletme A.Ş., which became effective on 15 March 2013, 384 km of motorway and 43 km of access road, adding up to a total of 427 km of motorway will be constructed to connect Gebze and Izmir. The Gebze Izmir Motorway route comprises construction of Izmit Bay Crossing Suspension Bridge, 29 viaducts, 3 tunnels, 199 motorway bridges, 20 toll plazas, 25 interchanges, 6 operation and maintenance

centers, 3 tunnel operation and maintenance centers and 18 motorway service facilities. In the project Gebze - Orhangazi - Izmir Motorway (including Osmangazi Bridge and Access Roads), which is one of Turkey's largest Build-Operate-Transfer modelled infrastructure investments, Gebze Junction-Bursa interstate motorway segment including the Osmangazi Bridge was completed and opened to traffic on 07.01.2016 and the motorway section between Bursa and Izmir on 04.08.2019.

PTO TİZİ OUZOU BOUIRA INTERSECTION MOTORWAY - PTO PROJECT

The 48 km long connection motorway between Tizi Ouzou-Bouira in Algeria is operated by the Özgün-Nurol Partnership, and within the scope of the project, 48 km of motorway, a total of 2 x 1.670 meters of double tube tunnel, 21 viaducts, and other structures, infrastructure and drainage system manufacturing will be completed. The section of the project between km: 0 + 000-10 + 000 has been opened to traffic, and the remaining parts are being constructed. Expected project completion: 2025.

In 2019, for the project:

- 1.163.314 m³ cut excavation
- 864.426 m³ filling works
- 64.758 m³ reinforced concrete
- 101.636 m³ tunnel excavation
- 53.577 m³ tunnel pavement concrete prod.
- 33.116 tons of superstructure cold mix prod.
- 89.944 tons of superstructure hot mix production completed.

In the project as of the end of 2019, total:

- 16.445.455 m³ cut excavation
- 3.226.041 m³ filling works
- 310.717 m³ reinforced concrete
- 629.610 m³ tunnel excavation
- 444.021 m³ tunnel pavement concrete prod.
- 236.211 tons of superstructure cold mix prod.
- 455.530 tons of superstructure hot mix production completed.



YUSUFELİ DAM BRIDGES PROJECT

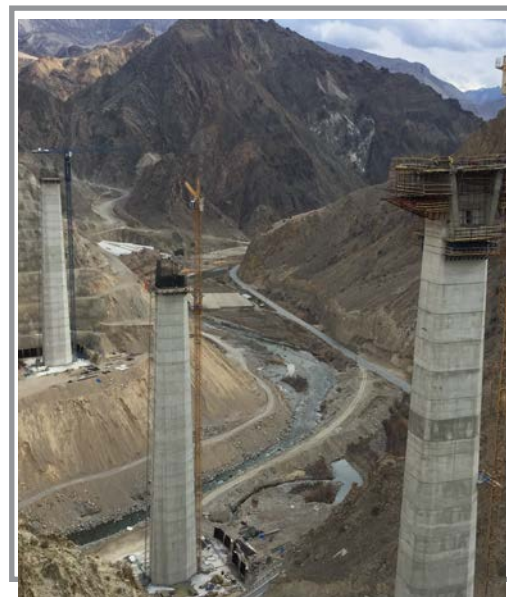
Yusufeli Dam Bridges Project has been undertaken by Nurol-Gülsan Partnership in 2017, and 4 balanced cantilever type bridges will be constructed on Yusufeli (Artvin-Erzurum) Dist. State Road. The bridges consist of 530 m long Şilenkar Viaduct, 644 m long Tekkale (Hazuket) Viaduct, 695 m long Yusufeli Viaduct and 340 m long Yusufeli Dam Viaduct. Expected project completion: 2022.

In 2019, for the project:

- 31.950 m³ cut excavation
- 33.586 m bolt production
- 8.664 m barbian production
- 317 tons of steel mesh rebar prod.
- 21.632 tons of shotcrete production
- 480.130 m³ cut excavation
- 2.044 m³ plain concrete production
- 14.329 tons of reinforcement working
- 67.919 m³ reinforced concrete production completed.

In the project as of the end of 2019, total:

- 309.789 m³ cut excavation
- 67.699 m bolt production
- 21.975 m barbian production
- 570 tons of steel mesh rebar production
- 44.040 tons of shotcrete production
- 941.307 m³ cut excavation
- 2.496 m³ plain concrete production
- 12.338 tons of reinforcement working
- 71.481 m³ reinforced concrete production completed.



YEŞİLYAKA PROJECT

Yeşilyaka project consist of construction of villas, social facility, sales office and trading area, around Büyükçekmece Sırtköy district on 1.008.732 m² land.

For the Yeşilyaka Project Mesa-Nurol Joint Venture established. Expected project completion: 2022.

ÜMRANİYE ATAŞEHİR GÖZTEPE METRO PROJECT

Under the scope of Ümraniye-Ataşehir-Göztepe Metro Line Project which was secured and signed with İstanbul Municipality on 2017, construction of 13 km long double tube TBM tunnel, 2 train depots (NATM) and connection tunnels (NATM) is being implemented. Project includes total of 11 stations distributed as 5 main shaft+tunnel type, 4 cut and cover type an 2 tunnel type stations. Once completed, project will connect three district at Anatolian side of İstanbul.

For this project, Gülermak-Nurol-Makyol Joint Venture established. Expected project completion: 2023.

SUPPLEMENTARY WORKS OF ORDU RING ROAD PROJECT

Within the scope of the project undertaken by Nurol-Yüksel-YDA-Özka Joint Venture, it is aimed to complete the remaining works of Ordu Ring Road Project. Expected project completion: 2023.

SİLİFKE-MUT ROAD PROJECT

Within the scope of the Silifke-Mut Road Project under the responsibility of Nurol Construction, 14,2 km long 2x2 lane motorway together with tunnel and engineering structures will be realized. 6.870 meters length of double tube road tunnel and 410 meters long cable-stayed and balanced cantilever beam Kılıçarslan II Bridge method) are also under the scope of the project. Expected project completion: 2023.

ILISU DAM AND HEPP PROJECT AND HASANKEYF GROUP BRIDGES PROJECT

Ilisu Dam and HEPP project is located on the Tigris River and is being implemented under Nurol – Cengiz Joint Venture. Concrete-face Rockfill type dam body has a volume of 27,76 million m³, and the annual energy production of the power plant with an installed capacity of 1.200 MWh is 4.120 GWh. The height of the dam from the foundation is 131 m and the maximum water level is 528,87 m. The planned completion date of the project is June 2020.

Construction of 465 m long Hasankeyf-1, 1.001 m long Hasankeyf-2 and 169 m long Başur bridges in Siirt and Batman provinces, which was undertaken by Nurol – Cengiz Joint venture in 2013, is expected to be completed on June 2020.

UNITED ARAB EMIRATES PROJECTS

Nurol U.A.E. was established on April 2003 in Abu Dhabi, the capital city of the United Arab Emirates as a local company. Dubai branch was opened in 2004. The main purpose of the company is to evaluate the potential in the construction sector in the region and operate in voluminous projects. Ongoing projects of Nurol UAE in Dubai and Abu Dhabi by end of 2019 are as below:

Corniche Tower Building Project

Located in Abu Dhabi, with total construction area of 67.000 m², it consists of construction of tower including commercial, office and residence sections. Expected project completion: June 2020.

P20 The Cove Dubai Gulf Building Project

Located in Dubai, total construction area is 76.000 m², and 3 residence buildings are being constructed. Expected project completion: July 2020.

GA09 Golf View Apartments Building Project

Within the scope of the Project in Dubai, there are 2 residential buildings consisting of 288 units and 14 detached apartments. Expected project completion: April 2020.

P32 Parcel Dubai Gulf Building Project

Located in Dubai, construction of twin towers including 471 residences will be completed. Expected project completion: May 2020.

GA14 Golf View Villas Project

Located in Dubai, construction of 204 villas will be completed. Expected project completion: June 2020.

Beach Vista Residential Towers Project

Located in Dubai Harbor, residential towers (2) will be completed by 2021. Expected project completion: April 2021.



FINANCIAL OUTLOOK





Financial Indicators
Economic Value: Generated & Distributed

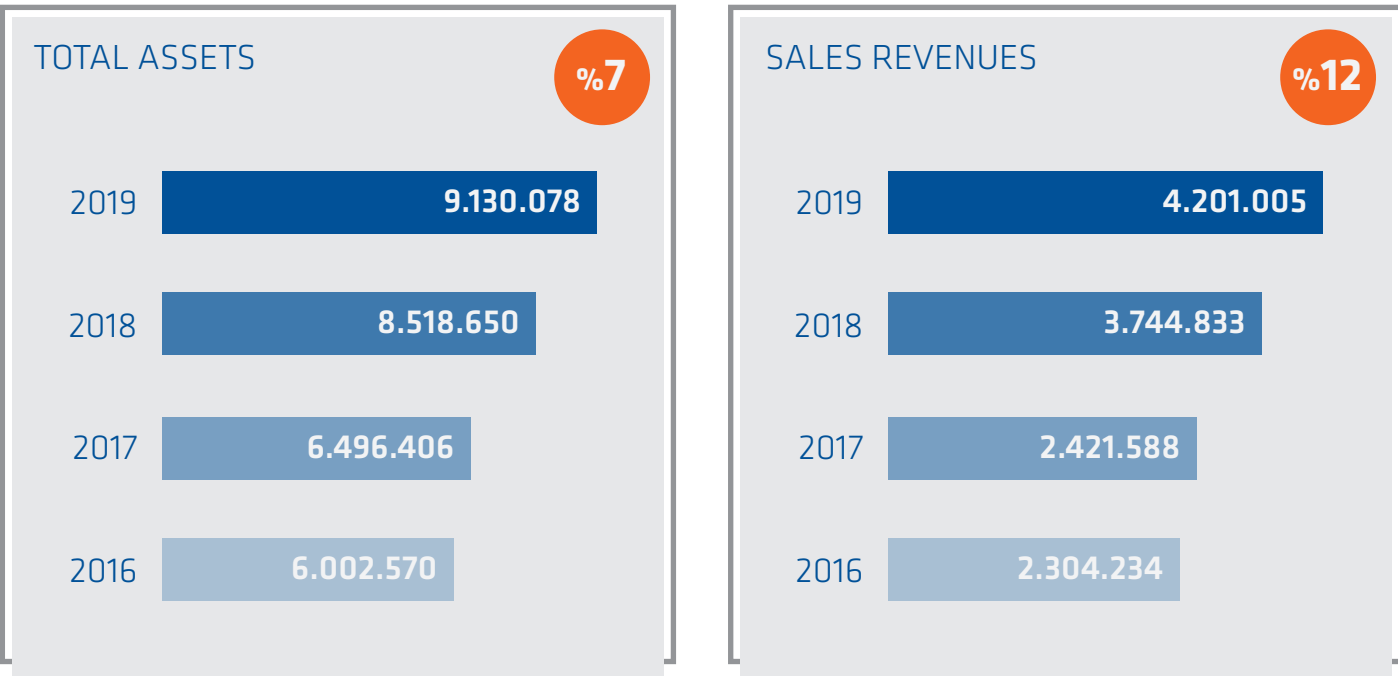
FINANCIAL OUTLOOK

FINANCIAL INDICATORS

The data generated from basic financial indicators of Nurol Construction, which continues to maintain its growth and stable financial structure in 2019, are as follows. As of the end of 2019, its consolidated asset size increased by 7% compared to the previous year, while equities increased by 2%. Shareholder's equity corresponds to 32% of total assets. Our revenue has increased by 12% and recorded approximately as TRY 4.201.005. By the end of 2019, the value of completed and on-going projects is above USD 25 billion.

FINANCIAL INDICATORS (IFRS - CONSOLIDATED) - TRY MILLION

	2016	2017	2018	2019
 Total Assets	6.002.570	6.496.406	8.518.650	9.130.078
 Total Shareholders' Equity	1.920.656	2.096.714	2.825.350	2.886.330
 EBITDA	368.752	550.814	951.525	597.743
 Sales Revenues	2.304.234	2.421.588	3.744.833	4.201.005



ECONOMIC VALUE: GENERATED & DISTRIBUTED

	TRY Thousand
I. DIRECT ECONOMIC IMPACT	
Net Sales	4.201.005
Dividends from Equity Method Investment Activity	603.577
Revenue from Investment Activities	132.341
Financial Income	343.061
Revenue	5.279.984
II. ECONOMIC VALUE DISTRIBUTED	
COGS (Including Operational Costs)	3.717.354
Administrative Expenses	24.376
Expenses for Society Development Activities	1.891
Financial Expenses	1.492.015
Taxes (Government related)	14.496
Total Expenses	5.250.132
III. PROFIT/LOSS (GENERATED ECONOMIC VALUE)	
Revenue	5.279.984
Total Expenses	5.250.132
Profit/Loss (Generated Economic Value)	29.852

Notes:

1. No significant penalty fees have been incurred within the reporting period.

BRANCHES AND PARTNERSHIPS

- Nurol L.L.C
 - Nurol Georgia L.L.C
 - Nurol Georgia Branch
 - Nurol Saudi Arabia Branch
 - Nurol Construction Libya Branch
 - Nurol Construction Algeria Branch
 - Nurol Construction Morocco Branch
 - Nurol Construction Erbil Branch
 - Nurol Construction Baghdad Branch
- Nurol - Cengiz Joint Venture
 - Nurol - Cengiz Hasankeyf Joint Venture
 - Gama - Nurol Joint Venture
 - Nurol - Özaltın - Makyol - Astaldi - Göçay Joint Venture (NÖMAYG)
 - Nurol - Yüksel - Özka - YDA Joint Venture
 - Nurol - Yüksel - YDA - Özka Joint Venture
 - Özgün - Nurol Joint Venture
 - Nurol-Gülermak Joint Venture
 - Nurol-Gülermak-Makyol Joint Venture
 - Nurol-Mesa Joint Venture
 - Nurol-Gülsan Joint Venture



GOVERNANCE

Board of Directors & Corporate Governance

Main Committees and Boards

Risk and Opportunity Management

Assessment of Process Risk and Opportunities

Monitoring Economic, Social and Environmental Issues

Occupational Health and Safety and Environmental Risk Assessment

Ethics Management

Policies and Principles for Practice

Rules and Working Principles

Codes of Conduct

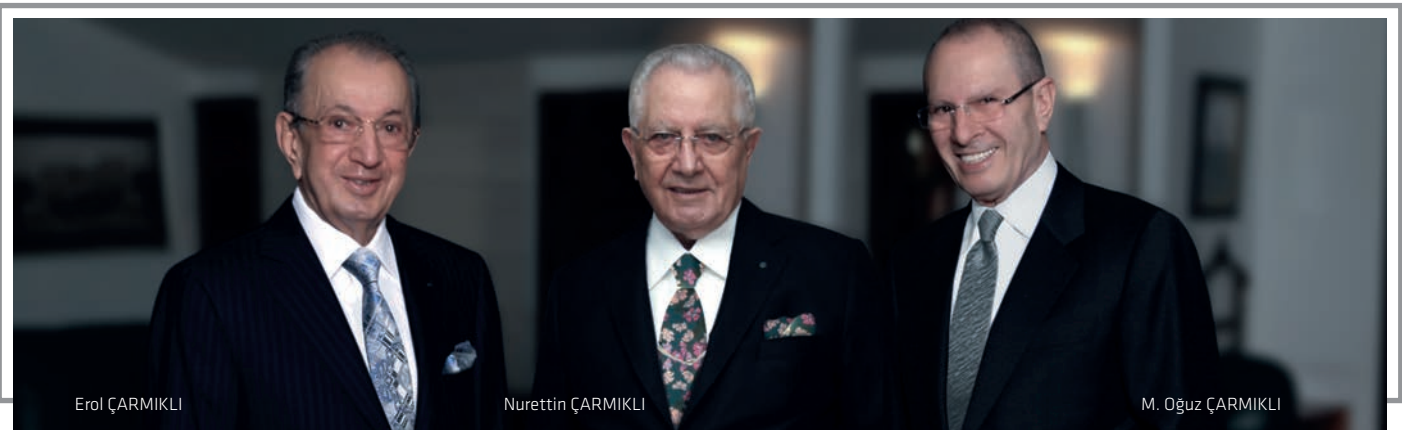
Ethics and Discipline Committee

GOVERNANCE

Nurol Construction is managed by the Board of Directors, unless otherwise stipulated by law. The Board of Directors consists of eight members and the entire Board of Directors has the competence to manage Nurol Construction in terms of educational background and work experience. Members of the Board of Directors are elected for a maximum of three years, and the members of the Board of Directors whose term of office expires can be re-elected.

In our projects conducted with our business partners; the Executive Boards are appointed, in which each partner is represented, that monitor all matters related to the project, especially administrative relations, business progress and financial situation. Executive Board Member representing Nurol Construction is responsible for informing Nurol Construction HQ regarding board activities and decisions and integrating Nurol HQ top management to decision making process. Thus, the Executive Board can be associated indirectly with Board of Directors.

Nurol Construction is managed through the General Manager, Assistant General Managers, Group Managers and Department Managers. Corporate communications of Nurol Construction is conducted with the support of Nurol Holding HQ.



BOARD OF DIRECTORS & CORPORATE GOVERNANCE

With the decision of the Board of Directors dated January 31, 2017, the members of the Board of Directors were approved to serve as shown in the table below.

Responsibility	Name & Surname
Chairman	Nurettin ÇARMIKLI
Vice Chairman	M. Oğuz ÇARMIKLI
Board Member	Gürol ÇARMIKLI
Board Member	Gürhan ÇARMIKLI
Board Member	Oğuzhan ÇARMIKLI
Board Member	Bülent ERDOĞAN
Board Member	Mehmet BUYURGAN
Board Member	Semih KAYAALP

DETAILED
INFO

For Board of Directors operations and Board Member biographies;
<https://e-sirket.mkk.com.tr/esir/Dashboard.jsp#/sirketbilgileri/11082>

In the meetings of the Board of Directors; the majority of the total number of members of the Board of Directors is sought and takes their decisions with the majority of the members present at the meeting. In case of equal voting, the matter to be decided upon is postponed to the next meeting. In the second meeting, the referred proposal is deemed as rejected in case equal voting again. The validity of the decisions are deemed valid when written and undersigned.

Ordinary meetings are held quarterly following the end of each operating cycle. The items to be discussed and decided upon in these meetings are as follows: election of related administrative unit, financial reports, yearly report of Board of Directors, assessment of profit utilization, dividend and earning per share decisions, Board of Directors release and items related with current operating cycle and other required items. In case needed, the Board can hold special meetings.

Operation and process details of Board of Directors are organized underthe articles of association.

Nurol Group Companies attend Nurol Group Board of Directors meeting, held four times annually and one being annual budget presentation meeting. Nurol Construction is represented by General Manager quarterly in Nurol Group Board of Directors meeting.

Project Control Department is responsible from information, documentation and presentation preparation for Board of Directors meetings. All production and financial data about projects are provided to Project Control Department by Worksite Technical Office Departments. After proper controls and filtering of data, Project Control Department makes the needed arrangement to make the data ready for presenting to Nurol Group Board of Directors. By the compilation of all data, General Manager signed report and presentation becomes ready to be shared by Board of Directors.

CODE OF GOVERNANCE

In 2018 'Code of Governance' was released defining the reasoning and behavior shaping all business relations and transactions, risk management applicable for all areas of activity, ethical principles and internal control policies. 'Code of Governance Manual' printed and distributed to all employees to increase employee awareness and accessibility of code of governance. During the orientation process, the "Code of Governance Manual" is delivered to each new recruited staff and information is given about the code of governance .

Code of governance include the following topics:

- Codes of Conduct
- Human Resources and Employee Relations
- Customers, Suppliers and Subcontractor Relations Asset Security and Protection
- Nurol owned Information Protection
- Fraud Prevention, Accurate Accounting Recording and Accuracy of Company Books
- Conflicts of Interest
- Honest Communication with Society and Media
- Occupational Health and Safety
- Product/Service Quality and Safety
- Sensitivity to Environment
- Respect to Law and Compliance to Regulations
- Anti-Corruption and Bribery
- Facilitation Payments
- Gifts, Representation and Hosting
- Consultants
- Working with Partners and Other Working Arrangements
- Lobby Activities, Political Support and Political Donation
- Sponsorships
- Disaster Management Risk Management
- Operational Excellence Declaration
- Social Responsibility and Volunteerism
- Charity Donations
- Violation Notifications

Code of governance are shared with employees through "Nurol Construction Family Talks", enabling briefing of employees on code of governance and increase awareness. It is emphasized that the code of governance are an important component of the Nurol Construction culture through the application, which is carried out to support the processes of employee participation, and it is expected to be transformed into a way of doing business by the employees.

Nurol Construction's signing the United Nations Global Compact in 2017 was one of the important steps in terms of sustainability. By undersigning the Compact, Nurol Construction top management has undertaken commitments to support Human Rights, Labor Standards, Environment and Anti-Corruption issues.

In 2019, trainings were provided to our administrative and security personnel regarding the Human Rights principles we have committed in the Global Compact and potential human rights issues that we may encounter in our projects.

MAIN COMMITTEES AND BOARDS

BOARD OF DIRECTORS



Board of Directors can delegate authority to individuals or committees excluding the non-statutory authority. Responsibility of management belongs to Board of Directors in case of non-delegation. Board of Directors can form committees or commissions via including the members of board, for business monitoring, report preparation, implementation of the decisions or internal control purposes.

ETHICS AND DISCIPLINE COMMITTEE



An Ethics and Discipline Committee has been established to conduct the ethics and reputation management and development in order to improve the level of implementation of the Nurol Code of Governance. The committee is responsible for ensuring Nurol's ethical and reputation management and development -in this respect - to examine notices and notifications that contain a suspicion of contradictory or unethical rules, to present the corrective action suggestions to the Holding Board of Directors, and to conduct ethical compliance and awareness programs based on the code of governance. Ethics and Discipline Committee ("EDK") consist of Human Resources Coordinator, Nurol Company Chief Counsel, Nurol Company Human Resources Manager and 2 members from Internal Control Department.

OHS-E COMMITTEE



OHS-E Committees are formed to inform employees and to take requests/feedback of employees regarding occupational health and safety, environment both for HQ and projects. Establishing an OHS-E board in our overseas projects is not a legal requirement, but the board is formed in all our projects. Project Manager, OHS Specialist, Financial and Administrative Affairs Officer, Relevant Department Representatives, Workplace Physician and Employee Representatives attend the board meetings where employee representatives are included. The boards of our subcontractors are also followed by our OHS-E departments.

NUROL CONSTRUCTION FAMILY TALKS ORGANIZATION



The Nurol Family Talks Organization, which was launched in order to ensure that Nurol Construction personnel play a more active role in the participation and consultation processes, is held at least 4 times a year. It was also aimed to increase the awareness of the staff on the code of governance in the organization, which was gathered under the coordination of the Project Manager and Human Resources Departments. In 2019, the Family Talks Organization was effectively implemented under the leadership of Project Managers, and the decisions taken in the organizations were followed through action plans and announced to the employees.

SUSTAINABILITY COMMITTEE



Sustainability Committee was established in Nurol Construction in 2019 to increase the effectiveness and improve the sustainability activities. The Sustainability Committee supports the determination and development of Nurol Construction's strategy, policy and goals in terms of sustainability. The Committee also evaluates the economic, social and environmental impacts of these goals and objectives. The committee is chaired by the member of the Board of Directors. It consists of the members at the positions of Assistant General Manager responsible for Financial and Administrative Affairs, Group Managers, Integrated Management Systems Manager, Project Control Manager, Human Resources Manager, Finance Manager and Business Development Manager. Integrated Management Systems Manager is responsible for the committee's coordination and secretarial activities. The Sustainability Committee is responsible for meeting at least 4 times a year and reporting to the Board of Directors and the General Directorate each year on the company's performance on social, environmental, governance and ethical issues.

PROCESS RISK ASSESSMENT TEAM



Nurol Construction process risk assessment works are carried out under the responsibility of the Technical Office Department and the Integrated Management Systems Department in the headquarter. Process leaders and Process Risk Assessment Teams are formed in the headquarter and projects. The Risk Assessment Team meets three times a month to review the Risk and Opportunity Management Plan. In the meetings, methods for managing risks and opportunities are determined, and plans for actions to be taken are created.



RISK AND OPPORTUNITY MANAGEMENT

Assessment of Process Risk and Opportunities

The most important factor in our success in dealing with the difficulties that can be encountered in the competitive sectors in which we operate is the understanding of analyzing and managing risks and opportunities in detail. Our approach, which encourages stakeholder engagement and shows rapid reaction to changes by monitoring international standards, has played a major role in this process.

Nurol Construction has been evaluating and managing its risks in terms of OHS-E for many years. While working on corporate risks, the Process Risk and Opportunity Management Procedure was published and started to be implemented in line with the high level structure after the revision carried out in the quality management system in 2015. In the risk and opportunity management works carried out in the headquarter and projects, issues that affect the performance of quality, environmental, occupational health and safety management systems and that may affect corporate reputation are addressed.

Process Risk and Opportunity Assessment works were started in 2017 with an understanding that tries to spread the risk-based mindset to all processes. Also in the year 2019, works are ongoing to improve this process assessment and to make it more effective. Activities to identify risks, to evaluate identified risks, to identify and monitor risk reduction or prevention methods are carried out within a certain methodology and importance rating for all our processes. After these works, the methods to be used to manage the related risks and opportunities are determined. The objective is to carry out activities preventing repetition in order avoid similar risks.

Integrated Management Systems Department is responsible from coordinating Nurol Construction process risk assessment works. The process risk assessment works unit, is located at our headquarter and the related works is conducted by the Integrated Management Systems Department and the Technical Office departments in our projects.



"Risk Assessment Teams" works are carried out in the process managed with the Risk and Opportunity Management Plans created. Risk assessment teams are informed in detail about the Process Risk and Opportunity Evaluation Procedure. During the trainings given by the HQ Integrated Management Systems Department, project specific samples are also given while informing about the methodology. The activities planned with the Risk and Opportunity Management Plans prepared through the teams are followed. Risk assessment teams meet quarterly and update the Risk and Opportunity Management Plans.

Besides regular reviews, Risk Management Plan is revised in case: changes in conditions of contracts, new technic developments, new equipment or machinery buy outs, changes in organizational structure or processes, new raw material or semi-manufactured goods production process, changes in regulations, environmental accidents, occupational accidents, completion of Risk and Opportunity Management Plan measures. Risk and Opportunity Management Plans created in the projects are followed by the HQ Integrated Management Systems Department and progress is made with the contribution of other related departments. The study was further expanded in 2019, allowing all processes to participate in these evaluation works.

Risks and opportunities identified for the Business Development and Tender stages are also examined, taking into account the cost, duration, scope, operational, environmental and social impacts. The risks and opportunities identified during the Business Development process are reconsidered at the tender stage. For projects reaching tender phase, the risk and opportunity assessments prepared are delivered to the Project Control Department along with the tender file in case of contract with the Employer. The Risk and Opportunity Management Plan is prepared by examining the risks and opportunities of the project by the Project Control Department and shared with the Project Manager appointed to continue the process.

Monitoring Economic, Social and Environmental Issues

Nurol Construction monitors its activities on economic, social and environmental issues at regular intervals through its target program that it develops every year. Through their target programs developed for departments and projects, their performances in the sustainability area are tracked. Referred monitoring is executed by regular monthly "Target Tracking Reports and Occupational Health and Safety and Environment Monthly Report". The achievement of the targets are also reported to the projects on a regular basis via the target report

cards and if there are deviations from the target values, attention is drawn to the project responsible, and additional activities to be conducted to achieve the target values are requested and followed. Besides, Daily Reports and Monthly Operating Report helps tracking of activity progress and compliance to working schedule. Yearly project budget compliance is also monitored by budget report shared monthly by project owners.

Project Monitoring type, Monitoring activity and frequency is as below table:

Monitoring Type	Monitoring Activities	Frequency
Daily Report	The report that includes daily productions of the project, personnel information, machinery and equipment information and current photographs.	Daily
Weekly Report	The report including the weekly productions of the project, cumulative manufacturing information, personnel information, machinery and equipment information.	Weekly
Monthly Report	The report that includes monthly productions of the project, cumulative progress, personnel information, machinery and equipment information, experimental reports of the project, external relations of the project, addendum and current photographs.	Monthly
Budget Realization Reports	The report that includes the income and expenses of the project, budget comparison, progress data and other analysis.	Monthly
Financial Management Risk Management Plan	The project risks and opportunities included considering latest economic developments	On-going
Quality Control Reports	Project based quality control report.	Monthly
External Relations Report	Project based monthly external relations report. The relations of the project with all stakeholders are followed.	Monthly
Contract Information Tracking Table	The contract summary information and progress payment information of the subcontractors, suppliers and service companies that we work with for the construction of works on our sites are updated monthly by our construction sites and published with the "Contract Information Tracking Table".	Monthly
Subcontractor Work Packages Tender Planning Table	The table that contains the information on the tenders to be held for the selection of subcontractors and suppliers to undertake the construction of work packages at our construction sites are planned on an annual basis, the work package to be prepared by our construction sites, the date of preparation of the tender file, the duration of the work, the approximate budget, the date for which the work is foreseen to start at the construction site, etc.	Monthly
Incoming and Outgoing Articles Registry	The record in which official correspondence from administrations, subcontractors or other institutions and followed by us is followed during the construction of our projects. In these tables, the articles especially about the Employer complaints are recorded, and the response time to these articles is followed.	Monthly
Risk and Opportunity Management Plan	The risk management plan by designating risk and opportunities that will affect the management system within the scope of quality, OHS-E and environment.	Quarterly
HQ and Project Risk Assessment Form	The record in which the risk assessment of OHS hazards and environmental aspects of the center and projects are made.	Monthly
Integrated Management System Program	The program where the actions to be taken for the achievement of the targets set at the beginning of the year in the HQ and the projects are followed.	Monthly
Target Follow-up Report	Quality, Occupational Health and Safety and Environment topics have "Target Programs" and this report will follow the monthly achievement of the targets.	Monthly
Monthly OHS-E Report	The report in which the data related to occupational health safety and environment are followed in the projects.	Monthly
Subcontractor OHS-E Report	The report where the data related to occupational health safety and environment of the subcontractors working on the projects are followed.	Monthly
OHS-E Follow-up Report	Inappropriate actions within the scope Occupational Health and Safety and Environment are recorded on this form. Necessary and corrective measures are taken.	Weekly
Corrective Actions Follow-up Report	In this report, deadlines and corrective measures for improper actions identified in HQ and projects are monitored.	Weekly
Incident Investigation Follow-up Report	Following of actions to prevent repetition of incidents happened both in HQ and projects.	Weekly
Hazard Notification and Near-Miss Follow-up Report	Following of actions to prevent repetition of hazardous and near-miss incidents happened both in HQ and projects.	Weekly
Monitoring and Measurement Plan	The plan where the records that are monitored periodically in accordance with the legislation and standards are followed in the HQ and projects.	Yearly
Training Plan	Monthly training completion following for the compliance of yearly calendar of quality, occupational health and safety and environment trainings for HQ and projects.	Monthly
Training Follow-Up Tables	The amount of training received for employees in the HQ and projects is calculated and tracked in the training follow-up tables.	Monthly
Accident Statistics Form	The form where the number of accidents occurring in the projects, accident frequency and weight rates are followed.	Monthly
Recruitment Tracking Forms	The form used to follow the implementation of the necessary procedures for the employee at the hiring centers and projects.	Business Entries
Legal Requirement List and Legal Compliance Assessment Form	The lists that follow the current status of OHS and environmental legislation. The record that follows what needs to be done within the scope of the legal requirements is the Evaluation of Conformity Form.	Daily

Occupational Health and Safety and Environmental Risk Assessment

Works on determining the OHS hazards and assessing their risks, as well as the environmental aspects are determined through the "Risk Assessment Procedure". We carry out these works in our headquarter and all our projects in accordance with our procedure, which explains the principles of determining and managing risks in OHS-E issues. We follow the risk control methods determined to manage risks and share our risk assessment results with all our subcontractors working in our field.

OHS-E risk assessment is revised at least once a year. It is also revised and updated in case of: new equipment or machinery buy outs which might effect both environment and health and safety of employees, new technic developments, changes in organization or work flow, new raw material or semi-manufactured goods production process,

environmental accidents, occupational accidents or occupational disease, any occurrence seriously effecting the environment and occupational health and safety, any incompleteness in actions.

Risk Assessment Groups are formed for OHS-E Risk Assessment works. In the groups; Project Manager, Representative of the Employer, Occupational Physician, Occupational Safety Specialist, Representative of Employees, Support Employees, representatives from related departments and employees from related departments are the participants. The Risk Assessment Team is trained on the risk assessment methodology before starting the work, and efforts to increase the competencies of the people on the steps to be followed in the risk assessment are constantly improved.


ETHICS MANAGEMENT

Policies and Principles for Practice


Codes of Conduct prepared for Nurol Group Companies include all standards and mindset for business relations and transactions of Nurol Construction. The principles are binding and explanatory for risk management, working principles, ethical principles and internal control.

These rules determine the ethical working principles and the principles that every employee must follow, regardless of where they are or their title, and apply to all employees of Nurol Construction. All employees regardless of the location should act accordingly and properly during the relations with all our stakeholders (other employees, customers, suppliers, subcontractors, shareholders and competitors, etc.). Adherence to the codes of conduct is the core for the reputation and the success of our company. Codes of conduct is our reference for all our actions & operations; we own them to represent our company as a model. In the light of this approach, we avoid any misbehavior which might affect our company reputation adversely. There are five basic principles of ethical rules and working principles:


Rules and Working Principles




Accountability
We are all responsible from our own actions




Honesty
Nothing counts like reality



Integrity
We walk the talk



Clarity
Sincere and direct answers to questions



Respect
We respect all individuals and treat in a dignified, respectful and thoughtful manner

Codes of Conduct

Nurol Codes of Conduct is as below:

- Human Resources and Employee Relations
 - Customers, Suppliers and Subcontractor Relations
 - Asset Security and Protection
 - Nurol owned Information Protection
 - Fraud Prevention, Accurate Accounting Recording and Accuracy of Company Books
 - Conflict of Interest
 - Honest Communication with Society and Media
 - Occupational Health and Safety
- Product/Service Quality and Safety
 - Environmental Awareness
 - Respect to Law and Compliance to Regulations
 - Anti-Corruption and Bribery
 - Facilitation Payments
 - Gifts, Representation and Hosting
 - Consultants
 - Working with Partners and Other Working Arrangements
- Lobby Activities, Political Support and Political Donation
 - Sponsorships
 - Disaster Management
 - Risk Management
 - Operational Excellence Declaration
 - Social Responsibility and Volunteerism
 - Charity Donations
 - Violation Notifications

In case we think that there is any violation of Codes of Conduct defined in Code of Governance; a notification phone line is established for notices of the employees. All announcements related with the usage of Ethics Notification Phone Line are posted on the notice boards.

All employees are liable for notifying the company via Nurol corporate website (www.nurol.com.tr), etik.bildirim@nurol.com.tr, Ethics and Discipline Committee and Ethics Representative and/or related Company General Manager for any suspicions of violation of these policies or legislation being subjected to. **Notifications can be via phone 0 312 455 10 05 directly to our Ethics Notification Phone Line.**

All notifications are anonymous and notifiers are not disclosed under no circumstances whatsoever. During notification and investigation period, confidentiality, objectivity and compliance to codes of conduct is crucial. In case of any intentional and inaccurate notification, it will be treated as violation of codes of conduct.

The practices applied forthe compliance to Code of Governance are reviewed by Nurol Construction Internal Control and corrective measures are taken in case of any detection of misconduct.

Violations are reviewed, solved and reported by Ethics and Discipline Committee.

Ethics and Discipline Committee

Ethics and Discipline Committee is formed to implement, execute, own and discipline the "Code of Governance" of Nurol and Ethics Committee is responsible from running the principles and practices. Ethics and Discipline Committee (EDC) consist of 5 members, Human Resources Coordinator, Nurol Company Chief Counsel, Nurol Company Human Resources Manager and 2 members from Internal Control Department. The working procedures and principles of the Ethics and Discipline Committee are defined by the "Nurol Ethics and Discipline Committee Working Procedures and Principles Directive".

Compliance to rules is under the responsibility of Nurol Group Board of Directors and Nurol Ethics and Discipline Committee is responsible from execution. Nurol Company Board of Directors and EDC revise the Codes of Conduct considering the developments once a year. The results and recommendations shared with Board of Directors.

The Ethics Discipline Committee is responsible for ensuring the ethical and reputation management and development of Nurol, to examine the notices and notifications that contain contradictions or suspicions of ethical rules, to present them to the Holding Board of Directors by preparing corrective action suggestions, and to prepare ethical compliance and awareness programs based on code of governance . When members of EDK receive any complaint/violation notification, they assure the complainant that all the notifications to be shared will be protected, and their name is kept confidential upon request of the complainant. Confidentiality and security measures are taken for those who are in charge or support the investigation.

Nurol Construction has procured services from a specialized consultancy company for the process of compliance with the Personal Data Protection Law (KVKK) since 2018. Following a current due diligence study that includes all of its processes, our processes started to be managed in accordance with the principles of KVKK. We identified personal data in our processes through data officers and entered them in to Data Responsibles Registry Information System (VERBİS) in order to define and manage business processes and compliance strategies regarding personal data use. In this context, our personal data are stored confidentially in the database and systems in our company, in accordance with the law, and are not shared with third parties in any way except legal obligations. As Nurol Construction, we prevent unauthorized access to the systems and databases where personal data is kept, and we implement software and physical security measures such as access management. In the recruitment processes, we inform our employees about our personal data protection practices and receive clear consent text from them.

We act in accordance with the confidentiality principles determined by the Employer in sharing information and documents with third parties that we had received from the Employer. In cases where the information of the employer needs to be shared, confidentiality agreements are drawn up with the parties, including these confidentiality clauses. At Nurol Construction, there has been no violation of confidentiality of Employer information, and there has been no warning or complaint from the Employers.

Nurol has adopted the principle of complying with laws and other regulations within the context of anti-bribery and anti-corruption laws, universal law, ethical and professional principles in all countries where it operates and is represented. Under this principle, it is committed to maintaining its activities in a fair, honest, legal and ethical manner. Nurol explicitly prohibits bribery and corruption, which

can take place in many ways, such as facilitation payments, gifts, representation and entertainment, lobbying activities, political support and donations. Combating bribery and corruption is an act that requires legal punishment as well as business ethics, and it is expected that our employees shall demonstrate sensitivity and deem this effort as a part of their personal duties and responsibilities independent of business life. At the same time, our company has established control systems to prevent informal transactions by protecting the legal rights of our government institutions, suppliers, customers, employees and other stakeholders we work with. Our

employees are responsible for notifying their managers or officers via the Ethics Hotline immediately, about any situations they encounter or suspect regarding bribery and corruption.

When we compare the requirements and practices of “Nurol Holding Anti-Corruption and Bribery Regulations”, which are an integral part of the Code of Governance and sustainability targets, and our activities in 2019 and as a result of the Ethical Reporting Line evaluations; it is observed that there has been no corruption incident in our company's HQ and projects.





SUSTAINABILITY APPROACH

Sustainable Development Goals

Sustainability Management

Sustainability Efforts and Reporting Process

Dialogue with Stakeholders

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SUSTAINABILITY APPROACH



NUROL CONSTRUCTION PROVIDES SUBSTANTIAL SOCIAL CONTRIBUTIONS TO THE GEOGRAPHIES IT WORKS WITH INFRASTRUCTURE PROJECTS. IT CONTRIBUTES TO THE DEVELOPMENT WITH THE TRANSPORTATION OPPORTUNITIES, SUPPORTING AGRICULTURAL ACTIVITIES WITH THE PROJECTS THAT CONTRIBUTE TO IRRIGATION AND INCREASING THE OPPORTUNITIES OF TOURISM AND TRADE. IT SUPPORTS UNIVERSAL AND FAIR ACCESS TO CLEAN WATER SUPPLY PROJECTS FOR RELIABLE AND PURCHASABLE DRINKING WATER FOR EVERYONE. BESIDES REALIZING THOSE PROJECTS OF OURS, IN ORDER TO BE ABLE TO BRING OUR CONTRIBUTIONS INTO SUSTAINABLE DEVELOPMENT; WE FOCUS ON SOUND **GOVERNANCE**, PROTECTION OF THE **ECOSYSTEM** AND STRENGTHENING **SOCIAL** ASPECTS.

As Nuro Construction, we care about the value of our projects on society and the world, and we are taking bigger steps day by day to ensure the sustainability of this value. For this purpose, we focus on a good governance infrastructure, activities based on protecting the ecosystem, our social impacts on society and the world, plus we integrate our sustainability approach with our business. We cooperate with our stakeholders and take their expectations into consideration while doing our job with the responsibility of being an organization possessing the vision of realizing many more signature projects worldwide. As a family, we strive to offer the best conditions to our employees, and we see it as our most important goal to make great contributions to the communities we work with, our country and the world together with them. With this vision and approach, we signed the United Nations (UN) Global Compact in August 2017 and included 10 basic principles within the scope of the works we carried out with great motivation in order to announce our activities globally. In this way, by speeding up our reporting efforts, we are reporting in accordance with the most up-to-date version of the globally endorsed Global Reporting Initiative (GRI) standard, which is beyond carrying the UNGC Progress Reporting qualifications.

By completing our first Sustainability Report, where we reflect our 2018 performances, we published all our work on governance, ecosystem and social issues through this report last year. We are publishing our sustainability management, which has been developing more and more, and our activities in this area in 2019 through this report. While preparing the report as a summary of the works we have conducted, we identify the issues that we need to create in terms of sustainability by using the titles in the GRI standard, and we try to implement new activities in these areas. Through the activities we carry out in terms of sustainability, we examine our stakeholder expectations more meticulously and implement new practices in line with the needs and expectations of our stakeholders.

SUSTAINABLE DEVELOPMENT GOALS

As Nuro Construction, while planning our activities in terms of sustainability, we take our steps according to the Sustainable Development Goals (SDGs) perspective published by the United Nations. We determine our activities in terms of sustainability in accordance with these targets by determining the most compatible with our corporate strategies of the relevant period from 17 global targets. As a member of the private sector, we believe that working on these targets, which point to the urgent and important environmental, social, humanitarian, economic and managerial problems facing our world, will also provide improvement on a global scale.

While carrying out our works in line with the Sustainable Development Goals, we took initiative in our group as a private sector, signed the global principles agreement and took an important step towards becoming widespread in our group companies. We will share our commitments with our stakeholders in terms of gender equality, which is the 5th item of sustainable development targets with a similar understanding, by taking leading steps in our sector and my group next year. You can reach detailed information on sustainable development from the link below:



<https://www.tr.undp.org/content/turkey/en/home/sustainable-development-goals.html>

In accordance with our corporate strategies, we share the sustainable development goals we focus on during this period below. You can see our activities in order to strengthen our compliance with these objectives in the content of our report.

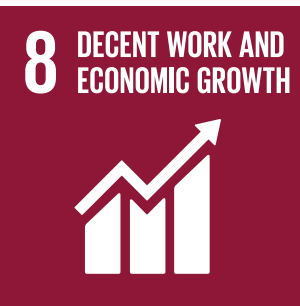
SUSTAINABILITY MANAGEMENT

We are committed to transform sustainability into a business conduct, embrace it within our organization and make it an integral part of our culture. We adopt and implement sustainability as a business model for all levels starting from our management style to our stakeholders. Our Board of Directors is liable at the highest level starting from our responsibilities towards Nuro Holding to our performance, from our responsibilities towards all our stakeholders to the establishment and internalization of our corporate culture. Therefore, Nuro Construction Board of Directors lead and serve as model for our company's economic, social and environmental approach, doing the business in ethical way, configuration of effective and reliable governance systems. Our Board of Directors is primarily responsible from transparency, management and performance of sustainability efforts.

Nuro Construction complies with legal and other required procedures quintessentially to its vision and policies.

In countries where Nuro has active businesses, on top of meeting legal requirements, we have principles aiming to surpass environmental and social necessities in the countries where legal requirements are insufficient. Therefore, local community opinions are taken into consideration and their needs, expectations and complaints are identified. This is the way of enhancing service quality and increasing harmony with stakeholders. "Code of Governance" have been released to form mechanisms for taking opinions on ethic related issues, and notification of unethical issues and following processes are defined in 2018. Code of Governance includes policies of codes of conduct and working principles and code of practice. "Ethics Notice Line" formed for notifying the company in case of any violation on policies and regulations which is accessible by all employees. After review and investigation of all notification, Ethics and Discipline Committee is informed and this committee prepares a report and kicks the solution process.

Nuro Construction has established a Sustainability Committee in 2019 in order to effectively address the sustainability issue with a broader vision, to increase its performance in this regard, and to add a new one to the leading and exemplary steps in its sector. The committee is chaired by the appointed member of the board of directors and the members are comprised of Assistant General Manager for Financial and Administrative Affairs, Group Managers, Integrated Management Systems Manager, Project Control Manager, Human Resources Manager, Finance Manager and Business Development Manager. The committee is responsible for reporting to the Board of Directors and the company's performance on social, environmental, governance and ethical issues every year, and convenes at least 4 times a year in line with the following objectives and responsibilities. The first meeting is planned to be held in 2020.



The objectives of the Sustainability Committee are defined below as follows.

- It supports the establishment of the institution's sustainability strategies and policies. It supports the implementation of the target and roadmap compatible with the established strategies and policies.
 - It controls the efforts to identify and manage risks and opportunities in the company's headquarter and projects. It provides the necessary information to the relevant locations/departments as a result of the controls made for the proper management of economic, environmental and social risks/opportunities.
 - It works to improve the sustainability performance of the institution.
 - It supports the implementation of corporate social responsibility projects in line with the United Nations Sustainable Development Goals.
 - Following the “mega trends”, it coordinates the necessary communications regarding the reflection of the results on the business manner of the institution.
- It supports the development of the institutional and operational infrastructure for sustainability programs and applications, and makes authorizations where necessary.
 - It tries to improve the commitment to sustainability policies in the institution and contributes to the spread of the sustainability approach in the institution.
 - It supports practices for the identification, promotion and spreading of examples of good practices.
 - It encourages internal and external communication regarding the initiatives and efforts in terms of sustainability, and coordinates its dissemination when necessary.
 - It makes a decision by evaluating potential sustainability initiatives and related costs.
 - It communicates with institutions pertaining to sustainability efforts and cooperates with such when necessary.

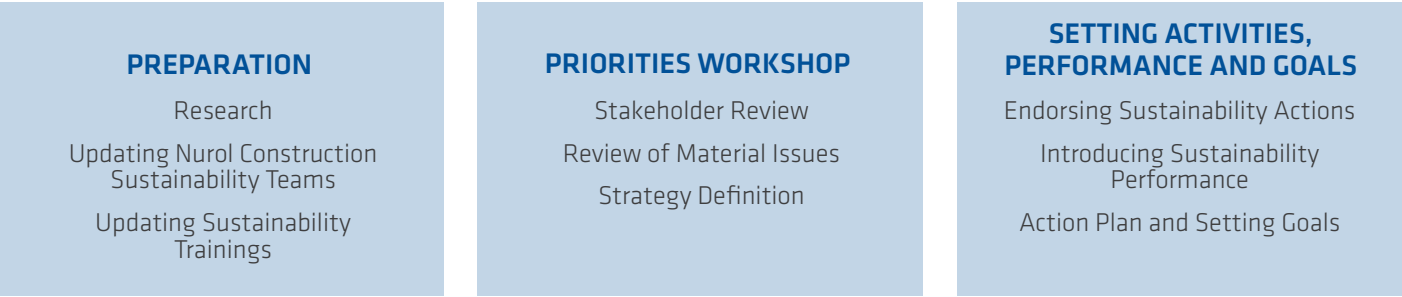
SUSTAINABILITY EFFORTS AND REPORTING PROCESS

Currently, Integrated Management Systems Department is responsible from managing and coordinating the sustainability efforts of Nurol Construction and projects. We have established a sustainability team in 2018 under the leadership of the Integrated Management Systems Department for sustainability management and reporting. We have cooperated with this team in preparing the 2019 report. Thanks to our experience of the previous year, our reporting process in 2019 has been more swift and solution-oriented. We have had an efficient working process both within the Integrated Management Systems Department at our Company Headquarters and with the support of our sustainability representatives in our projects. We have organized training activities in our headquarter and projects to increase the competencies of our teams, which generate data for the sustainability report.



Our Sustainability Reporting Process

As a part of our sustainability strategy and approach, within the scope of our Report; we aimed to provide information about our management approach, policies, practices we have implemented, our performance and goals that are important for our company and stakeholders.



PREPARATION PHASE

In 2019, in the first phase of sustainability reporting works, we organized a training study to increase the competencies of our employees in the sustainability team in the sustainability area and to provide detailed information about the reporting process. During the first Nurol YES Sustainability Report study in which we reported the 2018 performances, we had also conducted training works. The team's competencies in terms of sustainability increase every year with these trainings and applications. We determined our priority topic list with our sustainability team and other stakeholders, and shared them on a wide scale with our stakeholder groups. We asked them to rate the importance of 17 different priority issues we have specified for Nurol Construction. We shared our stakeholder engagement surveys with all these groups by listing our managers, employees, employers, partners, subcontractors, suppliers, consultants and financial institutions. In our letter that we shared while sending our survey, we not only emphasized the importance given to the sustainability field of our senior management, but also informed them about the work we will do with the answers we received through this survey.

DETERMINATION OF PRIORITIZED ISSUES

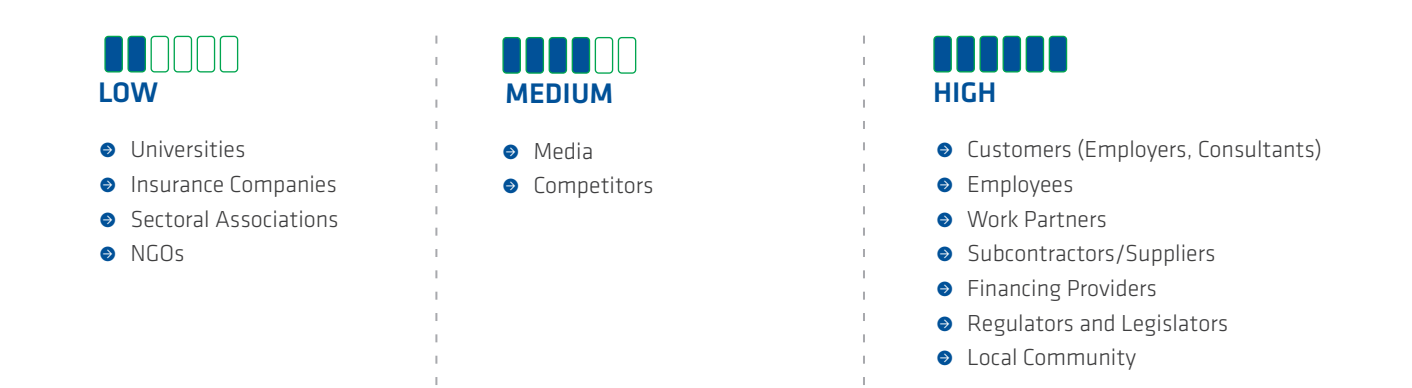
We carried out this work for 17 different priority issues that we consider important by analyzing the needs and expectations of our stakeholders. Our questionnaire, which we shared via a survey, inquired about how Nurol Construction should be prioritized when managing these areas, rather than our performance in these areas. We asked our stakeholders to rank priority issues by making an assessment from their own perspective. We have generated our current priority issues map by analyzing the results obtained.

SUSTAINABILITY ACTION AND PROCESS IDENTIFICATION

We brought together the company profile, operational environment, value chain, governance, economy, environment, social and ethical issues, information regarding performance and goals belonging to Nurol Construction with the support of sustainability team and sustainability representatives in our projects. This information is compiled and transferred in line with UNGC and GRI Standards. Outsourcing training is provided to the staff of Integrated Management Systems Department, which leads the sustainability team, and their competencies regarding both the sustainability concept and the GRI reporting process have been increased. In our projects, external and internal training activities were carried out for our teams that transmit data to sustainability reporting, and detailed information was provided about the reporting process and the issues to be considered while producing data while transferring the strategies of Nurol Construction senior management in terms of sustainability. We observe that as a result of the works involving our overseas projects, the efficiency of the reporting process has increased and the data collection period has improved. Since the data sets showing our performance in terms of sustainability have been added to the content of many reports throughout the year, the data transmission speeds of our projects have increased considerably.

DIALOGUE WITH STAKEHOLDERS

We have identified our key stakeholders in three different categories according to the degree to which they are impacted by or impact our activities, and classified our stakeholders as the ones that are most impacted by our activities or those that impact our activities as high,medium and low levels.



Dialogue Platforms and Frequency with Our Stakeholders

Our key stakeholders include our Employers, Consultant, Subcontractors, Suppliers, Partners, Employees, Financial Institutions, Legislative and Regulatory Institutions, Consultants, Civil Society Organizations and Local Communities with which we are in contact.

By preparing the stakeholder dialogue tables for all our stakeholders that we have identified, we can share our dialogue platforms (reports, meetings, correspondence, etc.), our frequency of dialogues, the topics discussed, etc. we have defined for all our locations. We develop our dialogues with our stakeholders in accordance with the principles of transparency as a requirement of our culture and reflected in the way we do business.

We convey detailed information about our company to our external stakeholders in transparency through the official website of Nuro! Construction that we actively use. We also actively utilize social media elements with the same approach. We have added our Sustainability Report to these communication channels, which we have been developing every day, and we share our environmental, social and economic performances openly with all our stakeholders through this report. Our report on our website is accessible by all our stakeholders.

We are aware of the importance of communication and collaborations with project stakeholders for the continuity and continuous improvement of our performance in terms of sustainability, therefore we address stakeholder expectations during managing project risks. We prepare “Employer Satisfaction Surveys” once a year for our Employers we work with and we receive the opinions and suggestions of our Employers. We analyze all correspondence from our employers through the representatives of Integrated Management Systems and if there are articles in the form of employer complaints, we treat them as corrective activities and carry out activities to prevent repetition. We receive their opinions through regular meetings with our subcontractors. We exchange views with our employees on various platforms, the details of which are explained in the report. We visit our main suppliers or get their opinions with other means of communication. We communicate with local administrations, legislators and regulators. We communicate with local people through local authorities and we strengthen the communication with local commercial institutions within the scope of developing the economy locally. We strengthen our relations with the local community by providing staff from the locals in all possible situations.

We also consider sustainability issues during the selection of subcontractors and suppliers, among our key stakeholders with whom we have relations in our projects. We include the organizations' occupational health and safety and environmental performances in the selection processes. We question whether the institutions whose financial structures are evaluated, have any deficiencies regarding their employees.

By being fair to all parties, we make our choices by taking into consideration the competenciesand criteria regarding the specifications and requirements determined for the service or product demanded by the relevant units. Subcontractors are determined by the tender method as described in the Subcontractor Tender and Selection Procedure, and the supplier selection is proceeded by the tender method as described in the Purchase Procedure. We support the economic development and development of the local community

by carrying out purchasing activities from local channels for all possible situations in our projects.

In the working schedule of the subcontractors we will work with in our projects, in addition to the evaluation of the offers, the subcontractor mobilization times, construction method, similar work completion and references, the qualified personnel list foreseen for the project, machine list, firm quality documents and "Subcontractor Selection Process OHS-E Evaluation Form" responses given by the company, records related to past OHS and environmental performances are taken into consideration. It is decided by the project management that they are sufficient to do the work after subcontractors are evaluated before bidding according to the criteria mentioned above.

In our projects, apart from routine field activities and follow up of other processes for the evaluation of the subcontractors' performances, system audits are carried out within the annual plan and the findings resulting from this audit are reported to the subcontractors. Corrective action plan is requested from subcontractors and all these findings are followed. Subcontractor Performance Evaluations are performed once a year and whether the subcontractor's workable or not is evaluated by the projects. End-of-job evaluations of our subcontractors, whose contracts are completed, are conducted at all times.



Our suppliers, on the other hand, are assigned levels by considering the criteria of the material to be one that directly or indirectly affects quality. Suppliers with a direct impact on quality are evaluated at least once a year according to the “Supplier Performance Evaluation Procedure”. In addition to the supplier evaluations the results of which are monitored through the ERP program, the environmental and social performances of the suppliers are also measured through the second party audits. The findings pertaining to the suppliers thatare audited in scheduled audits, are conveyed in a report and their results are tracked through corrective actions. During the corrective action development process, our subcontractors and suppliers are provided with information and experience support through our Integrated Management Systems Department.

We utilize various dialogue platforms to learn about our stakeholders' expectations from us on sustainability issues and to inform our stakeholders on these issues. We follow all these dialogue channels through stakeholder dialogue tables.

Stakeholders	Communication Platform	Frequency of Dialogue	Topics
Employer – Domestic	Visits, dialogues, employer audits, creditor audits, e-mail, official correspondence, meetings, reports, agreements, activity report, allowance, permits, project approvals	Continuous, daily, weekly, monthly, in case needed	Project technical interviews, implementation of the project, daily field checks, working schedules, project drawing minutes approvals, progress payments, materials and quality control, manufacturing material issues, occupational health and safety and environmental issues, official correspondence via the Administration, Supervision Agency and the Employer, e-mail messages, on-site job deliveries, following job request forms, as-built project approvals, quality control experiments and reports, sampling, citizens and other administrations, working schedules, quarries and expropriation matters, field visits, participation in the coordination meetings under the chairmanship of the Regional Manager at the Project Manager level, audits by project creditors, field production permits
Employer – Abroad	Meetings, correspondence, reports, presentations	Weekly, monthly, in case needed	Project progress, quality, OHS-E, allowance payments, technical, financial, administrative and contractual issues related to the project
Consultant – Domestic	Visits, dialogues, audits, e-mail, official correspondence, meetings, reports, job request forms, quality test forms	Daily, weekly, monthly, in case needed	Administration and employer correspondence, e-mail correspondence, implementation of the project, job deliveries in the site, job request forms follow-up, as-built project approvals, technical discussions on productions, project quality control tests and reports, sample testing
Consultant – Abroad	Meetings, correspondence, reports, presentations, site visits	Weekly, monthly, in case needed	Project progress, quality, OHS-E, allowance payments, project issues
Subcontractors	Meetings, dialogues, offers, agreements, official correspondence, dialogues, e-mails, trainings, OHS committees, audits, site visits, warning and safety signs, reports, ethical statement	Daily, weekly, monthly, in case needed	Project matters, work schedules, drawing deliveries, work progress and planning, OHS, quality and environmental issues, allowance payments, work deliveries, coordination meetings, reporting
Suppliers	Meetings, offers, agreements, official correspondences, e-mail, trainings, OHS committees, audits, site visits, order letters, ethical statement	Daily, weekly, monthly, in case needed	Payments, standards, quality, OHS and environmental issues, sectoral developments, financial issues, security
Legislative and Regulatory Institutions	Corporate visits, dialogues, official correspondence, meetings, site visits, seminars, permits, presentations	Weekly, monthly, annually, when necessary	Business, SSI, OHS, environment, tax law issues, permits, expropriation, public order and security issues, administrative procedures, project permits, infrastructure, energy permits, transfers, displacements, line acceptance
Partners	Board meeting, Executive board meeting, correspondence, Regional Directorate meetings, ethical statement, project partnership meetings, dialogues	Monthly, semi-annually, if necessary	Project progress, quality, OHS-E, mutual interactions, site management issues, partnership matters, sectoral matters
Employees	Trainings, social events, e-mail correspondence, meetings, notice boards, intranet, trainings, contracts, Nuro! Construction Family Talks organizations, internal communication materials, corporate web page, Nuro! Publications, coordination meetings, ethical statement, social organizations	Daily, weekly, monthly, in case needed	Informing the employees about their duties in the project, construction site information sessions, Integrated Management Systems informing, OHS-E informing, labor law issues, employee personal rights, job descriptions, administrative affairs issues, Nuro! Code of Governance
Union	Meetings, correspondence	Monthly, yearly, in case needed	OHS, employee personal rights
Financial Institutions	Regional and project management visits, accounting department visits, official correspondence, dialogues, visits	Daily, weekly, monthly, in case needed	Project and investment issues, deposit transactions, payments
Society	Official correspondence, dialogues, non-governmental organizations, media, social responsibility activities, ethical statement	Monthly, in case needed	Project related requests and complaints, environmental issues, project information, expropriation issues
Media	Press releases, interviews, social media, project management visits	Yearly, in case needed	Project news, social responsibility news, project presentation, project progress
NGOs	E-mail, correspondence	Yearly, in case needed	Opinions on legislation, certification
Advisor	Correspondence, site visits, meetings, workshops, report	Monthly, in case needed	Project implementation, work progress, working schedule, allowance payments, OHS-E, technical, legal and financial affairs
Universities	Official correspondence, visits, dialogues	When necessary	Awareness, personal development trainings, experiments, scientific subjects, academic studies, internships

SUSTAINABILITY PRIORITIES

After our study to determine the priority issues we carried out through stakeholder engagement surveys in order to determine our sustainability priorities, we have addressed our corporate success and sustainability issues, which have the greatest impact on our stakeholders, and the issues that our key stakeholders care about and want to learn as our primary sustainability issues. These issues are included in the "Material Issues Matrix" below. As part of our sustainability strategy and approach, within the scope of our report; we are committed to provide information about our governance approach, policies, practices, our performance and objectives, which are crucial both for Nurol Construction and our key stakeholders. In addition, we strived for addressing information that is important for our stakeholders and the other issues that we believe have high impact on Nurol Construction's corporate success within the framework of our management approach and practices.

According to our Nurol Construction stakeholder engagement survey results, our prioritization analysis is as follows.



Conducting business activities in construction sector, Nurol Construction and Trading Co. Inc., focuses on the construction of infrastructure and superstructure projects, subways, motorways, dams, hydroelectric power plants, hotels, public housing, ready to operate production and industrial plants and waste-water treatment plants.

We operate with a human-oriented approach; and we respect our employees, society and environment where we operate. We deem occupational health and safety as a priority. We provide safe and healthy working conditions for our employees and comply with all relevant legislation within this scope. We prioritize protecting

occupational health and safety, structuring and working in a way to prevent occupational accidents.

Besides economic growth, Nurol Construction provides all kinds of relevant support to its stakeholders in order to contribute to local economic factors in the regions where it operates. It provides direct and indirect economic benefits to the region where it is located, with different employment opportunities in different geographies, with local suppliers and labor force, and creates employment in the regions where it operates. Nurol Construction, which has the working principle by fully complying with the legal regulations of the relevant regions abroad, also supports the fulfillment of the legal obligations of

subcontractors such as tax and SSI in the country when necessary. It is crucial for Nurol Construction to have a positive background in all fields of activity with the criteria like experience, financial performance and technical competence in the selection stage of the companies and business partners where goods and services are purchased and sold.

As Nurol Construction, we stand against all kinds of bribery and corruption. We refuse accepting and giving bribes for any reason whatsoever, we terminate our business relationship with third parties who intend to do business with Nurol Construction by this means. In this regard; we act within the framework of Nurol Code of Governance. It is important for us to have a positive background in all fields of activity with the criteria like experience, financial performance and technical competence in the selection stage of the companies and business partners where goods and services are purchased and sold. Companies or business partners having negative intelligence about bribery or corruption is not considered as a stakeholder even if all other criteria meet our expectations.

We take care of our relations with our internal and external stakeholders and evaluate their expectations, demands and complaints. This includes dialogue between employee and management, as well as relations with the local community at the project sites.

Within the scope of our Sustainability Report, we will mainly share our approach, policy, implementation, performance and goals related to our priorities. Besides; Integrated Management Systems, which contributes to the systematic management of sustainability issues, are included. In addition, our corporate memberships, which directly or indirectly contribute to our sustainability goals, are also mentioned.

Nurol Construction launched a new restructuring process for the Human Resources Department in 2019. This new restructuring with HR's general approach to its processes; has been to act with the principle of participation and ownership. We shape our perspective in HR processes with the belief that all successful institutions and enterprises have a good human resources infrastructure.

The overall approach of Human Resources as of 2019 is to maximize the competencies of all personnel effectively and efficiently. In line with the regarding training needs analysis, training and development plans were generated. Trainings were organized according to the priority of need and started to be organized partly. In addition, the necessary orientation and motivational activity plans are made in order to ensure the personal development and commitment of the employees.

The effectiveness of the role played by the Human Resources Department within the organization depends on the efficient and effective use of human resources, the most important of the resources available to an organization. While carrying out all our projects in this direction, we care about being human-oriented. We act with a human-environment-society approach in our projects. We protect employee rights and responsibilities through regular legislative follow-ups. As a team that has adopted the open-door HR approach, we offer an environment where all our employees can consult and convey opinions on all matters.

As Nurol Construction, we act with the aim of not making it difficult for women in the business world to be effective and equal in business life via our HR policies and practices, in line with our belief that a sustainable future will be possible with the active participation of women in business life. We develop the human resources policies of the project and the community, where the performance on equal opportunity will be measured, monitored and improved with action plans, in a way that will make it easier for women to get stronger while joining and working. If we are to concretize this; Nurol Construction, playing an active role in women's empowerment and equality of opportunity in Turkey and international platforms, has completed its application to sign UN Women's Empowerment Principles(Weps) in 2019.

We attach importance to develop an amiable communication infrastructure with our staff in order to improve working conditions. We provide mentoring support for our young stakeholders to discover their strengths in career management. We take the opinions of all our employees about the operation and act as a bridge between the management and the employee.

We take care to ensure that working environments are safe, healthy and comfortable, and ergonomics is very important for us. We convey our sensitivity about occupational health and safety rules to our employees with permanent methods through the orientation trainings we provide on the first working day.

We are making preparations to establish a performance appraisal system on the basis of organizational equity. Our purpose in performance evaluation is not to identify the weaknesses of our employees and to demotivate them; we take care to establish a road map for their development.

We are committed to build our staff base from the locals in order to encourage employment in the staff recruitment phase of the projects.



WITH THE INTEGRATED QUALITY APPROACH IN MANAGEMENT,
WE ADOPT A CULTURE OF EXCELLENCE AS A LIFESTYLE.

INTEGRATED MANAGEMENT SYSTEMS

Within the scope of Integrated Management Systems (IMS) in Nurol Construction; our objective is to develop permanent, continuously improving, sustainable structures for quality management system, environmental management system and occupational health and safety management system in accordance with the requirements of international standards. We aim to implement Nurol standards throughout all projects by the coordination of Integrated Management Systems Department managed from HQ. Our teams that are engaged in quality, environment and OHS issues in our projects will ensure and maintain high standards via coordination with HQ. We monitor and control the related performance of our projects through regular project visits and internal audits conducted by our HQ IMS organization, as well as reporting. Through regular internal audits, we audit all Nurol Construction projects in accordance with the

specified procedure and monitor the audit results centrally. We examine the implementation levels of the projects during the site visits and inform them about recent developments. We report all control results to senior management and monitor the results. Due to the changes in recent years in the markets we are actively operating, we are trying to spread the practices that meet social requirements due to increasing expectations in the environmental and social areas of our potential employers and financial institutions. During our visits and audits, we also review practices on social issues and try to increase our effectiveness in this field with new application methods. We are developing new practices in line with the Sustainable Development Goals, and we are working on compliance with the environmental and social expectations of international banks such as EBRD and IFC.

Our External Audits and Certifications

As Nurol Construction we have been audited for years by independent auditing companies in accordance with ISO 9001 Quality Management System, ISO 14001 Environmental Management System and 45001 Occupational Health and Safety Management System standards, and we maintain the national and/or international standards that we have crowned our high standards. We are periodically audited every year within the scope of contracting services for the investment, design and construction of all kinds of domestic and international construction projects of our company.

In 2019, we successfully completed our re-certification audit by the independent certification body and once again proved our success and improvements in the implementation of ISO 9001 Quality Management System, ISO 14001 Environmental Management System and 45001 Occupational Health and Safety Management System standards. In 2018, we were among the first companies in our country to switch to ISO 45001: 2018 Occupational Health and Safety standard. In 2019, we had the opportunity to review many practices that we developed in accordance with the new standard with audits. Unlike the previous years, Nurol Construction has revised its certificates this year by auditing through the BSI (British Standards Institution) independent certification body.

We fulfill the requirements of the security management system we established in 2018 within the scope of the "NATO Secret and National Secret Facility Security Certificate" in 2019 and we manage our relevant processes in accordance with this system. We review our security management through internal audits we conduct within the company, and inform our employees every six months under the document. In 2019, we applied for a "Individual Security Certificate" for our personnel working in the relevant departments and increased the number of employees with the certificate.

T.R. Ministry of Labor and Social Security audit some of our projects in Turkey related to Occupational Health and Safety. The audit scope includes compliance with Occupational Health and Safety legislation on site and documentation. Similarly, T.R. Ministry of Environment and Urbanization conducts audits regarding environmental legislation compliance.

STANDARD, DOCUMENT TITLE				ACCREDITATIONS	
					
ISO 9001: 2015 Quality Management System	ISO 14001: 2015 Environmental Management System	ISO 45001: 2018 Occupational Health and Safety Management System	Facility Security Certificate (Nato Secret and National Secret)	Turkish Accreditation Agency (TÜRKAK)	UK Accreditation Service (UKAS)

CORPORATE MEMBERSHIPS AND EXTERNAL RECOGNITION

Information about our corporate memberships and recognition in external structures as Nurol Construction is as follows:

By being a signee of the United Nations Global Compact in August 2017, we pledged that we will support and act on the 10 fundamental universal principles of human rights working standards, environment and corruption. We are members of Supply Chain Working Group and Women's Empowerment Working Group formed by the UN Global Compact Turkey's Secretariat and we participate actively. In 2019, we also applied to become the signatory of the "Women's Empowerment Principles (WEPs)", focusing on the empowerment of women, which are among the sustainable development goals.

The World Water Council is an international multi-stakeholder platform organization with the mission to mobilize action on critical water issues at all levels, including the highest decision-making level, by engaging people in debate and challenging conventional thinking. The Council focuses on the political dimensions of water security, adaptation and sustainability. We are a member of World Water Council.

In addition to being a member of TUSIAD (Turkish Industry and Business Association), we participate in the Energy Efficiency Task

Force and Environment and Climate Change Working Group activities and follow the decisions. TUSIAD formed three sub-working groups under the Climate Change Working Group. Referred sub-groups are; Climate Change and Low Carbon Economy Sub-Working Group, Financing Models and Incentives Sub-Working Group and Zero Waste Sub-Working Group. As Nurol Construction; by being an active member of TUSIAD, we express our opinions during preparation of environmental legislation.

According to the largest contractors list prepared by News "Engineering Record"(www.ENR.com) based in the United States, Nurol Construction has been listed as the "The Biggest Global Contractors" and "The Biggest International Contractors" for the last 15 years.

Founded in 1952, Turkish Contractors Association - TMB, act to address the problems of member companies and to improve domestic and international connections and cooperation via continuous activities, meetings and trainings. Besides being one of the most active members of TMB, we were committed to participate and contribute to the meetings and workshops of the association in 2019 as well.



Foreign Economic Relations Board of Turkey – DEİK

The Board undertakes the task of "managing foreign economic relations of the Turkish private sector". Together with founding Institutions, members and the Business Council and Turkey's leading entrepreneurs & representatives a volunteer "business diplomacy" organization. As Nurol Construction, we take part in the executive boards of the Business Councils of Romania, Algeria, Qatar, United Arab Emirates, Hungary and the United States operating under DEİK.



İstanbul Chamber of Industry – ICI

An effective stakeholder giving direction to the industrial ecosystem, an organization developing the Turkish industry worldwide by increasing the sustainable competitiveness and competencies of our industrial companies.



İstanbul Chamber of Commerce – ICOC

Promoting the rapid development and expansion of trade, small industry and service sectors. Works to create new markets abroad. Identifies the obstacles for the development of the business world and acts to remove the barriers. We are a member of Istanbul Chamber of Commerce since we moved our HQ from Ankara to Istanbul in 2015.



Asphalt Contractors Association of Turkey – ASMÜD

As a non-governmental organization representing the real sector in the asphalt industry, the Ministry of Public Works and Settlement has been actively communicating with the General Directorate of Motorways, which has an important place in the development of the asphalt industry with the decisions and initiatives, and has been organizing various activities and joint works with coordination since its establishment.



Turkey Construction Industry Employers' Association – İNTES

It was established in Ankara in 1964 and it is a non-governmental organization representing the leading companies of the Turkish construction sector. The aim is to contribute to the development of the industry with its activities and to help the sustainable growth and development of the national economy. The members of İNTES, which are defined as “Construction Industrialists” are the companies that have the principles of constructing their business according to the rules of science and art and qualified employment and being registered in the economy. İNTES members increase the brand value of the Turkish construction industry with the projects they complete in Turkey and abroad. In addition to construction, İNTES members support the development of our country with investments in different industries such as energy, agriculture, food and tourism.



Turkish Exporters Assembly – TİM

TİM is the only umbrella organization of Turkey's exports representing more than 90 thousand exporters, including 61 exporters association, 85 thousand goods, 5 thousand services exporters. In order to achieve the foreign trade surplus goal of Turkey, it provides the increase in the volume of sustainable trade, improve the bilateral trade, social and cultural relations with trading partner countries whom we collaborate, in the events which will be held in line with this goal, it serves as a bridge between public and private sector.



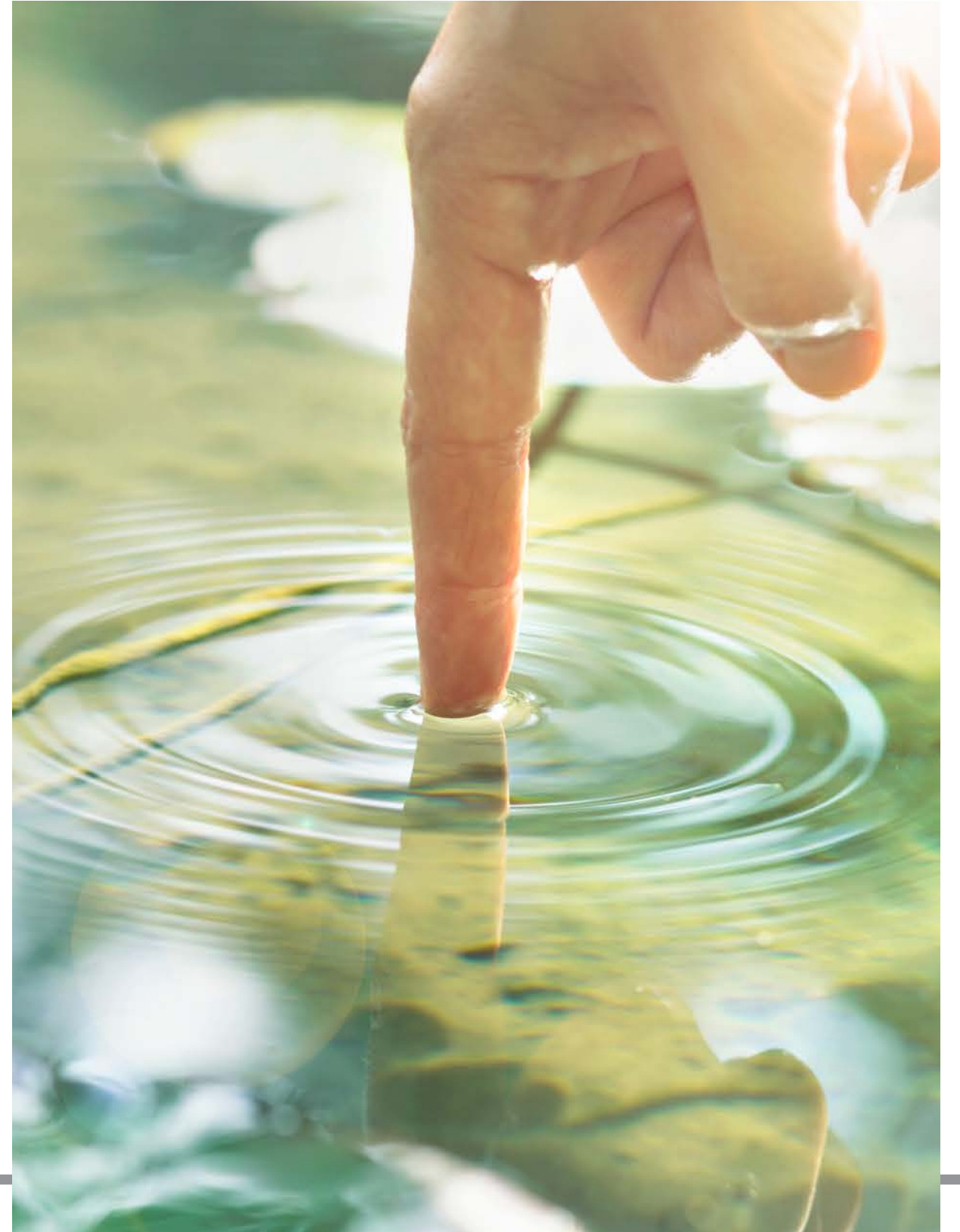
Union of Chambers of Turkish Engineers and Architects - UCTEA

The chamber is engaged in activities to protect and improve their rights and interests on the basis of the common interest of our people; ensure their professional, social and cultural development; and provide a common ground to use their professional experiences for the benefit of public.



Sustainable Development Association (SDA) - Materials Marketplace Platform

The Materials Marketplace Platform, supported by EBRD, is a cyclical economy project designed to support inter-company/industry reuse of materials (waste, by-product, etc.). Currently, the 82 members of TMM enable the creation and realization of shopping and cooperation (synergy) opportunities by entering the material/waste/by-product information they want to buy and/or sell and following the current material information of other companies. As Nuro Construction, in 2019 we became a member of the Materials Marketplace Platform, which is a Business and Sustainable Development Association Project. We shared the remaining materials from the demobilization process of Balıkesir Motorway Project with the buyers through the project. In this way, waste materials were reused and contribution was made to the circular economy.





ENVIRONMENTAL AWARENESS

Environmental Trainings

Energy and Emission Management

Water Management

Water Withdrawal

Efforts Behind Water Consumption Decrease

Waste-Water Management

Water Discharge By Receiving Environment

Water Bodies Affected by Water Discharges

Waste Management

Biodiversity

ENVIRONMENTAL AWARENESS

As Nurol Construction, we manage environmental impacts arising from our activities, and implement various applications in order to protect the environment and respect nature. As an integral part of our culture, we care and support environmental sustainability.

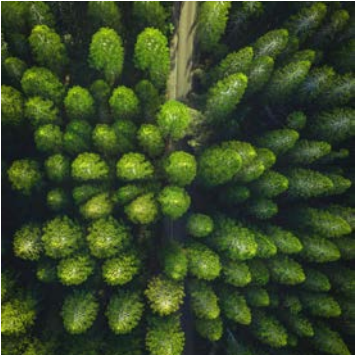
We undertake that we aim to protect the environment in every are we operate with our “Environmental Policy”, and we work in compliance with this policy.



In all our projects, we determine and manage our environmental aspects with a proactive approach in order to reduce or completely eliminate the environmental impacts caused by our activities. By determining the potential environmental impacts that may occur depending on these environmental aspects, we designate the appropriate control methods for these effects. We control our environmental impacts by developing activity plans for which responsibilities and deadlines are set. Natural resource consumption, soil, water, air pollution, environmental dust, pollution from noise, chemical consumption, waste production, greenhouse gas emission, natural disasters, and effects on flora and fauna are among our environmental dimensions stemming from our activities. We consider all our environmental aspects pointed out by legal requirements as important and apply the necessary control methods regarding these dimensions. We update the “Environmental Aspects Risk Assessment” study, which we regularly review, in accordance with the activities and current situation.

As Nurol Construction, we manage the Environmental Management Systems Management, which we have established in line with ISO 14001: 2015, according to the principle of continuous improvement, while fulfilling the legal requirements in the countries where our projects are located. In cases where the legal requirement in a pertaining country has expectations lower than our system requirement, we continue to implement environmental management systems as a minimum. In line with our sustainability policy, we strive to minimize environmental damage with a proactive approach in all our processes. Therefore, we follow the changes in environmental legislation and take our measures in accordance with the change. We conduct centralized up-to-date follow-up of legal requirements, provide information to all our teams in our projects on these issues and make suggestions on how to implement the practices. Apart from legal and standard requirements, taking into account the expectations of our stakeholders in our projects, we also include our stakeholders in our management system if our stakeholders have environmental expectations.

We review our management system through internal audits that we carry out periodically, and follow up the environmental findings identified with



Making a positive contribution to UN's sustainable development goals determined in order to eliminate the urgent and important environmental problems facing our world constitutes the basis of our sustainability strategy. For this reason, clean water and sanitation, accessible and clean energy, sustainable cities and communities plus climate action are among the most important goals we focus on.



legal We have not been subject to any significant sanction or penalty by the Provincial Directorate of Environment and Urbanization or other/local administrations due to a non-compliance with environmental legislation in 2019,. During our audits, we have found out no suppliers that had significant negative impact on environment.

In our Balıkesir Motorway Project, the amount of monetary penalty determined by Dolsar Company, which conducts audits on behalf of the Principal Lenders, after the environmental and social audit reports for 2019 due to articles of nonconformity of subcontractor activities is \$7,500. requirements and standards through corrective action systematics. We are working to carry out corrective actions that prevent the recurrence of the findings by reaching the root causes. We also include issues that we think will create improvements in audits, and we plan to carry out activities on the issues we have identified as opportunities for improvement. We have encouraged all our projects for improvement efforts by including the goal of preparing an environmental improvement report in our 2019 annual target programs to increase environmental improvement works. In addition, according to the scale of the project, environmental trainings, environmental field tours, organizing meetings with subcontractors on environmental issues, planning second-party audits on environmental issues are included in the 2019 target programs. In this context, we have begun to hold quarterly meetings on environmental issues in all of our projects, and the topics in the environmental heading in the project are followed through these meetings.

We took important steps in 2019 to improve subcontractor performances, which have a major impact on our environmental performance. We plan audits and review their environmental performances in order to ensure that our subcontractors and suppliers we work with are able to monitor their environmental impact. We fully control the compliance of the companies we work with with legal requirements and support them with knowledge and experience to complement their shortcomings. In 2019, we increased our second-party audits and started to expand our audit teams so that they could be carried out in all our projects. We have extensively provided the information about the audits we conducted for our subcontractors and suppliers and respective 2019

results in the Sustainability in Value Chain Management section of our report.

We develop waste management plans in line with the principle of cradle to grave in all locations where we operate, and we include our subcontractors in these works to ensure the proper disposal of our waste. We adopt a life cycle perspective in waste management and we manage waste, starting with the mobilization process, including the warranty period of our projects. We create the waste water management infrastructure before our activities begin, and we determine our methods for the disposal of waste water according to the facilities of the location of the project. While organizing waste management works, we carry out works in accordance with the waste hierarchy, and manage it in accordance with zero waste principles. We continue our work with an understanding that can contribute to the circular economy.

According to our corporate culture, we believe that one of the most important steps in our environmental management system is to increase the consciousness and awareness of our employees on this issue. We endeavor to create competent teams to carry out and improve environmental practices in our headquarter and projects.

ENVIRONMENTAL TRAININGS

Increasing the environmental awareness and consciousness of our employees and stakeholders that we work with will ensure that our corporate culture in this regard is further developed, and that environmental sensitivity is reflected more effectively in our way of doing business. For this reason, we attach great importance to the environmental education process and try to increase the environmental awareness of our projects day by day. We also encourage our subcontractors and suppliers, who have significant effects on our environmental performance, to participate in these works. We regularly monitor the environmental trainings of our subcontractors through follow-up tables, and support them in this regard if needed.

Annual training plans are prepared with the training needs analysis we have conducted in our headquarter and projects. Environmental trainings are organized in accordance with the training plans. The foundation of our environmental trainings is built on waste management and environmental awareness trainings given to our newly employed personnel within the scope of orientation. These

Every day, we plan trainings to increase the competence of our teams, and ensure their participation in effective seminars and meetings on sustainability issues. We employ environmental engineers and environmental officers in our teams. However, our point of view in this regard is to bring this awareness to all our employees, not only to our relevant teams. For this reason, we strived to implement projects on environmental awareness issues in 2019. In particular, reducing waste consumption, water and energy saving were among our priority issues.

We have not been subject to any significant sanction or penalty by the Provincial Directorate of Environment and Urbanization or other/local administrations due to a non-compliance with environmental legislation in 2019. During our audits, we have found out no suppliers that had significant negative impact on environment.

In our Balıkesir Motorway Project, the amount of monetary penalty determined by Dolsar Company, which conducts audits on behalf of the Principal Lenders, after the environmental and social audit reports for 2019 due to articles of nonconformity of subcontractor activities is \$7,500.

trainings especially focus on how our employees can contribute to the reduction of waste and what they can do about water and energy savings. In our projects, trainings are given on environmental risks and precautions, environmental legislation, waste management, disposal of chemical substances, environmental management in emergencies, environmental accidents in addition to job-specific trainings.

Alongside the responsibilities arising from our reporting process in 2019, sustainability trainings have been our priority. Trainings have been organized for senior management in order to raise awareness about the environmental conditions that our stakeholders demand from us, and these trainings are targeted to be increased in the coming years. In 2019, 1252,75 person.hours of environmental training was provided in our reports and our headquarter.

In our projects, our subcontractors are monitored through daily, weekly field tours and 2nd party audits. The findings are followed up according to the corrective action systematic, and in case the nonconformities are not remedied, warnings are given with an official letter , subject to administrative fines when necessary.



ENVIRONMENTAL TRAININGS GIVEN IN 2019 CONSIST OF 1.253 PERSON.HOURS.

ENVIRONMENTAL TRAINING HOURS - 2019

	Total Training Hours (employee.hour)	Training Hour Per Employee (hour/employee)
Environmental Trainings		
HQ	158,5	2,46
Balıkesir Motorway Project	250,75	1,21
Eyiste Viaduct Project	120	1,37
Boukhroufa Dam Project	462,5	2,05
Souk Tleta Dam Project	261	1,15

ENVIRONMENTAL TRAINING HOURS - 2019

	Total Training Hours (employee.hour)	Training Hour Per Employee (hour/employee)
All Trainings		
HQ	2.231	34,344
Balikesir Motorway Project	17.752,75	50,63
Eyiste Viaduct Project	3.823,5	44,59
Boukhroufa Dam Project	3.583,5	19,31
Souk Tleta Dam Project	1.508	6,58

ENERGY AND EMISSION MANAGEMENT

We determine our emission sources through environmental dimensions risk assessment works we carry out in our projects, we analyze the effects of these sources and ensure that necessary actions are taken to minimize the impact on the environment. We also follow the legal permission processes arising from emission sources. We have to consider all our emission sources, which directly and indirectly affect greenhouse gas.

We ensure that all measurements are carried out every 2 years in order to check whether there is any deviation from the data stipulated in the permit area in concrete plants and asphalt plants that are subject to emission permit, which are managed by our subcontractors. In these facilities, CO, NO_x, NO₂, SO₂, dust, volatile organic material measurements are made and compliance to limit values is checked.

In our motorway projects, although emission of greenhouse gases occurs from asphalt plant activities, emissions from steam boilers occur in beam casting areas. In our plant systems, we carry out insulation work in order to reduce heat loss. At the same time, waste gases are released into the atmosphere via the vertical air outlet, which can be transported unobstructed by the free air flow. Chimney heights are compatible with the legislation. Considering the locations of the dominant wind and receiving environments, warehouse sites

are planned and positioned to minimize dust production potential. A portion of the said emissions are not subject to emission permits for the projects in our country, but we still carry out measurements.

We regularly control dust emission from concrete plant and quarries, particulate substance 10 (PM10) and collapsible dust values at regular intervals. In order to prevent dusting, we construct dust barriers, we irrigate in areas where we work, we use pulverized systems (dust reduction systems). We minimize dusting by closing the crushing screening unit conveyor and conveyor belt tops. We ensure periodic maintenance of the concrete plant cement silos regularly and the filter system is renewed. In our Balikesir Motorway Project, a soil embankment was made around the concrete plants that we think is close to the settlement, and trees were planted to prevent dust from spreading to the environment. In the Souk Tleta Dam Project, dust level is minimized by installing a sprinkler irrigation system on the casting belts of the crusher on site.

As Nurol Construction, we regularly record our energy consumption data. The data we recorded includes our fossil fuels from heating, our electricity consumption, the fuels we use for vehicles. Based on the data we have recorded, we are improving our efforts to reduce our energy consumption.

- By regularly maintenaning our systems exposed to heat, leakage and unnecessary energy loss are prevented.

Our employees are informed about energy saving and unconscious consumption is prevented.

Devices that consume less energy are preferred as much as possible. Energy saving bulbs are used in lighting bulbs, photocells are used for environmental lighting.

The heating system is operated in accordance with the air temperature, the use of air conditioning is kept at a low level.
- One of the most important energy consumption indicators in our dam projects is the energy spent during the transportation of excavation-filling materials. In order to reduce this energy consumption, road routes that will provide minimum consumption are determined, thus saving fuel consumption.

All electricity requirements are met through the city grid. Electric infrastructure; generators are set up to operate only in the event of a breakdown in the city network. In this way, unnecessary use of generators is prevented.

Damaged electrical cables are replaced immediately.

In addition to dust emissions, we also have fossil fuel utilization for transportation and heating; energy consumption and greenhouse gas emission resulting from electricity consumption. The said energy consumption and the greenhouse gas emissions arising from these consumptions are given below.

OUR ENERGY CONSUMPTION

In-House Energy Consumption (Gj)	BKAO Project		KHEV Project		BBFA Project		BST Project		TOTAL	
Fuel / Warming										
	2018	2019	2018	2019	2018	2019	2018	2019	2018	2019
Diesel (fuel/heating)	69.425,65	65.552,22	1.564,52	914,95	101.646,39	115.778,36	32.463,63	16.739,23	205.100,19	198.984,76
LNG*	3.743,87	3.577,18	-	-	-	-	-	-	3.743,87	3.577,18
CNG**	-	-	2.320,97	2.412,04	-	-	-	-	2.320,97	2.412,04

Electricity										
	2018	2019	2018	2019	2018	2019	2018	2019	2018	2019
Electricity Form The Grid	5.607,24	2.447,97	2.086,38	1.516,61	14.302,82	8.271,87	1.685,71	1.415,65	23.682,15	13.652,10
Total Energy Consumption	78.776,77	71.577,36	5.971,87	4.843,60	115.949,20	124.050,23	34.149,34	18.154,88	234.847,18	218.626,08

Note 1: The data provided in the table consists of energy consumption of Scope 1 and Scope 2 in GHG emissions calculation methodology, in other words, the consumption of machinery and vehicles belonging to Nurol Construction.
Note 2: Electricity is used for heating purposes in Boukhroufa Dam Project, so there is no fuel consumption recorded here. There is no heat center in Souk Tleta Dam project, thus there is no fuel consumption for heating purposes.

*Liquified Natural Gas - LNG: Liquefied Natural Gas ** Compressed Natural Gas - CNG: Compressed Natural Gas

GREENHOUSE GAS EMISSIONS FROM OUR ENERGY CONSUMPTION (tCO₂e)

Emission Source	BKAO Project		KHEV Project		BBFA Project		BST Project		TOTAL	
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SCOPE 1 - Direct Emission										
	2018	2019	2018	2019	2018	2019	2018	2019	2018	2019
Diesel Fuel Combustion Emission	5.144,98	4.857,93	115,94	67,80	7.532,79	8.579,18	2.405,81	1.240,51	15.199,52	14.745,42
LNG Combustion Emission	210,04	200,68	-	-	-	-	-	-	210,04	200,68
CNG Combustion Emission	-	-	130,21	135,32	-	-	-	-	130,21	135,32

SCOPE 2 - Indirect Electricity Emission										
	2018	2019	2018	2019	2018	2019	2018	2019	2018	2019
Direct Electricity Consumption Emission	724,27	316,20	269,49	195,90	2.034,18	1.176,44	239,75	201,34	3.267,68	1.889,87
Total Emission	11.224,27	10.232,74	631,59	466,82	17.099,76	18.334,80	5.051,36	2.682,35	34.006,98	31.716,71

Note 1: Data consists of the energy consumptions in Scope 1 and Scope 2 emissions for the calculation for GHG emissions, in other words, GHG emissions from machinery and vehicles belonging to Nurol Construction.

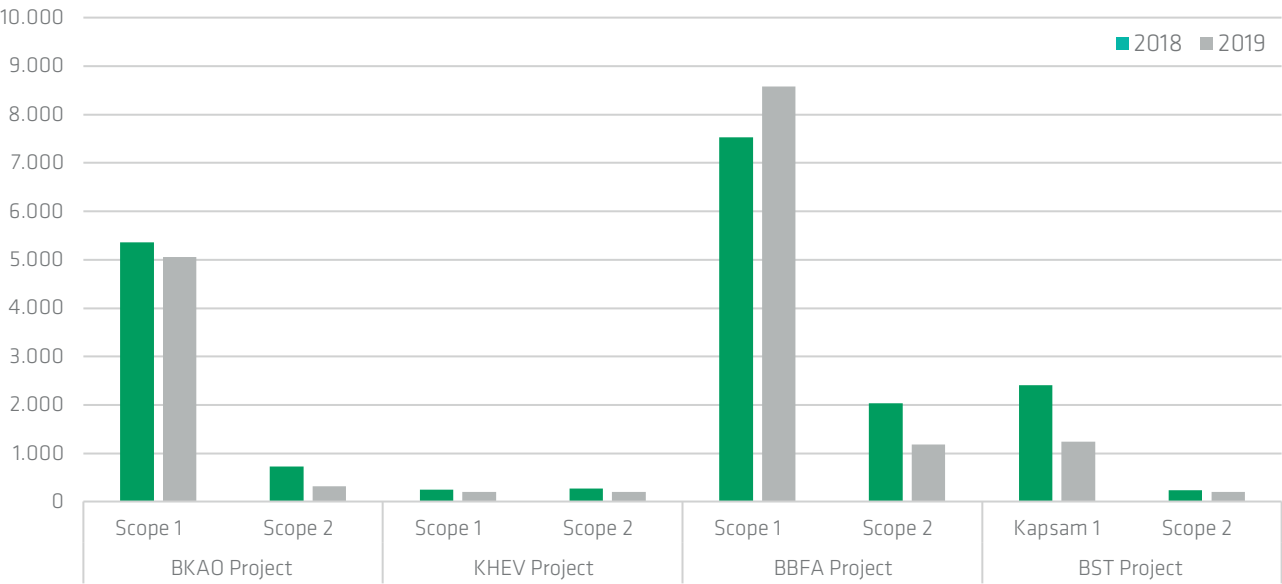
Our direct and indirect emissions belonging to our projects in 2018 and 2019 in GJ and tCO₂ are conveyed via the tables above. The data for 2018 was recalculated according to this year's calculation methodology to be comparable.

In 2019, a total of 7% decrease in our emission value in terms of tCO₂ is observed. Detailed comparison tables of our projects are as follows. In our Balıkesir Motorway Project, the decrease in our work on site and the decrease in the amount of fuel we use for the construction machinery have also affected the emission amounts. Due to the active site work in our Boukhroufa Dam Project, the increase in our fuel quantities from our construction machines has caused emissions to increase compared to last year. Our works in Konya Eyiste Viaduct and Souk Tleta Dam Projects for saving electricity use and fuel minimization have reduced our emission amount.



WE REDUCED OUR EMISSIONS BY 7%.

PROJECTS EMISSION QUANTITIES (tCO₂)



Operating in the construction sector; we do not have the means to provide the GHG emission intensity of our projects, due to the the fact that the production processes are gradual (earthworks, concrete works, etc.), different manufacturing types (motorway, dam, etc.) and each project and project location have its own characteristics.

WATER MANAGEMENT

In addition to water being our basic need, we manage water utility in all our processes to ensure the deliberate and effective use of water, which is our most important natural resource, and we take many measures to prevent unnecessary use of water. In the decade we are living when we face problems such as water scarcity, access to clean water with climate change, we demonstrate a more sensitive approach to water management in every location we work. In this context, we manage our water with solutions suitable for the conditions of the regions we work.

In our Nurol Construction headquarter, we frequently inform our

employees to raise awareness about water management. We use contactless sensor faucets to prevent water waste. At the same time, we put an end to the use of plastic water bottles in our headquarter and prevented the throwing of unfinished water, thus saving drinking water.

In the Ertuğrul camp site in our Balıkesir Motorway Project, caisson water is used as running water, and the high groundwater level of the construction site is the main reason for this. Due to the fact that well depths are less than 10 meters, they are not subject to legal permission in accordance with the "Groundwater Regulation". In the

level measurements made in the well, it was observed that the water level was constant and that the drawn water did not create an attraction that would affect the water mass. The region where our Balıkesir Motorway Project is located is outside the water basin protection limits. However, due to our construction activities, we

implement measures to prevent groundwater and surface water from being affected negatively. Our priority is to eliminate the environmental impact, if not eliminated, to bring it to a minimum. Our environmental impacts are summarized below.

- Splitting and filling works for the motorway, operation of the quarries, landscape works, cleaning the area and surface flows that may occur in soil storage areas,
- The use of bituminous insulating materials necessary to ensure the waterproofness of the concrete surface during construction,
- Leaks and spills caused by fuel tanks in the camp site,
- Wastewater generated in the camp site,
- Deterioration of river beds during manufacturing and while creating warehouse areas,
- Natural deep splitting operations following the excavations,
- Production of art structures at the points where the groundwater level is high.

Water management procedure is developed within the scope of terrestrial environmental management plan to reduce the referred impacts, defining how to work around surface water and groundwater resources during our construction activities. Within the existing route, considering all the dry and overflowing creek beds below structures are planned. Considering the effect to prevent water flow during flood periods, hydraulic structures such as bridges, culverts and diverting channels sizes were also revised. In this context, 22 box culverts, 4 bridges and 3 viaducts will be used for river crossing.

In our Eyiste Viaduct Project, the water requirement is met with the drainage system created by collecting the water leaking from the surface to the ground, and any groundwater and aboveground water sources are not used for withdrawal. For this reason, we do not have

an adverse effect on the source of the water used. We apply the works that will minimize the environmental effects which occur during our activities carried out in our project, in our field and camp sites.

In our Boukhroufa and Souk Tleta Dam Projects, surface waters and groundwater are used due to the locations of our camp sites and sites. We take our precautions for surface waters and groundwater, taking into account the environmental impacts arising from our activities. In our Souk Tleta Dam Project, permits from competent authorities have been obtained for utility of groundwater, and water analysis are carried out in three-month periods. We use surface water in our Souk Tleta Dam Project for concrete plant and plots, and we prefer groundwater for utility water.

Water Withdrawal

We provide our water for our camp sites and work on site, according to the infrastructure systems of the locations we are located and the available usage resources. We follow the water we use and the discharges of the water we consume. This tracking system allows us to improve our work to calculate our water footprint.

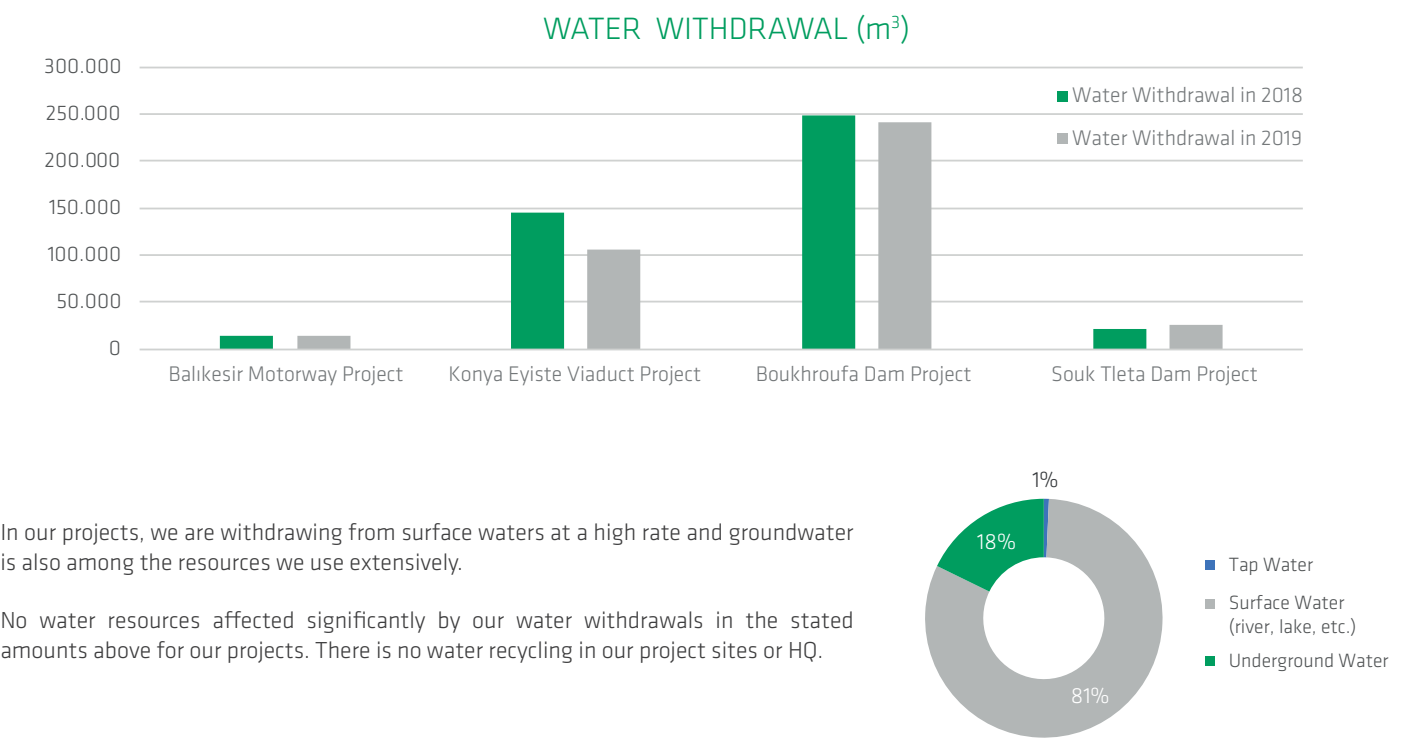
Tracking of water withdrawal and discharge will help us to measure water footprint and manage our activities more effectively.

Water Drawing Levels according to source is mentioned below:

WATER WITHDRAWAL BY RESOURCES (m³)

Project	Tap Water	Surface Water (river, lake, etc.)	Underground Water
Balıkesir Motorway Project	2.670	-	11.105
Konya Eyiste Viaduct Project	-	105.680	-
Boukhroufa Dam Project	-	200.000	41.505
Souk Tleta Dam Project	-	9.480	16.200

When we examine the water withdrawal data, our water withdrawal data in 2019 is less than in 2018. Depending on the intensity of our activities, our water draft differs in our projects. Surface waters are generally used for our site work and groundwater wells are preferred for use in camp sites. We also have a project that utilizes surface water in camp sites.



In our projects, we are withdrawing from surface waters at a high rate and groundwater is also among the resources we use extensively.

No water resources affected significantly by our water withdrawals in the stated amounts above for our projects. There is no water recycling in our project sites or HQ.

Efforts Behind Water Consumption Decrease

We take measures for the conscious use of both drinking water and potable water in our projects, and we produce various solutions according to the opportunities at the locations where we operate to reduce water consumption. In our activities with intensive water use, we take special care to reduce water consumption and periodically check the amount of water consumed. Although there is no water source that is significantly affected by our water withdrawals in our projects, the saving measures taken are listed below.

Our Balıkesir Motorway Project

The amount of water used in the camp site in Balıkesir Motorway Project is 13.375 m³ for 2019 and it is 65,7 m³ for drinking water. The following measures have been taken to save water.

- Leakage monitoring through regular controls of water consumption (i.e., determination of water leaks in pipes by comparing consumptions).
- We quickly fix faults that will increase water consumption.
- Shower heads and taps frequently controlled by camp supervisor to prevent water leaks.
- Savings through ensuring that washing machines are used only by authorized persons with the selection of the economic programs of the machines,
- Ensuring effective water consumption by switching to drip water system in the construction sites hobby gardens.
- Creating a saving awareness via warning signs.
- By improving the storage conditions of the packaged water we use, we ensure its use without losing the quality of drinking water. In this way, we prevent the formation of waste drinking water by ensuring that the products are used as long as their shelf life.
- Thanks to high standards of construction sites, we prevent the consumption of packaged water for utility purposes by reaching every point in the site area and also reduce the generation of packaging waste.
- We also reduce our water consumption by raising our employees' awareness thereof.

Konya Eyiste Viaduct Project

In the Konya Eyiste Viaduct Project, the amount of water used in the camp site is 18.073 m³, and with the water consumption measures we have taken, there is a 4% reduction in water consumption compared to last year.

- We provide instructions to our employees to prevent unnecessary water consumption.
- We try to minimize losses by responding quickly in case of failure.
- Thanks to the fact that there is water installation in all areas of the camp site, we use packaged water only as drinking water.

Boukhroufa Dam Project

In 2019, 38.385 m³ of water was used in our project in the camp site. We have increased the number of awareness raising activities on water use. The amount of water used for filling material and concrete irrigation has decreased by 28% compared to the previous year and the water used for concrete plant has decreased by 2%.

- To meet the water requirement of the crusher facility, a creek was built on the stream bed, and after the water accumulated in the crate was used in the crusher facility, the suspended materials collapsed by resting in the pool in front of the spring cofferdam. This rested water is used again for irrigation of roads and injection drills with its body filling. In this way, we save a 172.200 m³ of water taken from the creek Boukhroufa of 200.000 m³ reusing it.
- We inform our employees about water conservation in environmental information trainings we provide.

Souk Tleta Dam Project

In our project camp site, a total of 16.200 m³ water use have been carried out, and water-saving measures have been taken in the following manner.

- Utilizing of water saving systems.
- Saving by designating a single area for the car wash system.
- Storage of drinking water in suitable environment and consumption for the main purpose.
- We create awareness among our employees through trainings on the conscious use of water.
- We have warning signs in places where there is water use in order to prevent unnecessary use of water.

Waste-Water Management

Depending on the infrastructure in the regions where we operate, domestic waste water disposal methods are determined at the planning stages of our projects, and domestic waste water is transferred to the sewage system in the regions with the appropriate infrastructure. In areas where there is no sewage system, we use a septic tank application or treatment system depending on the number of employees envisaged to stay in the camp.

In our projects where there is no proper sewage system, we obtain the permissions from the legal authorities and install septic tanks. The septic tanks are constructed as leak proof to eliminate the environmental impact and are checked by the authorized institution for the leak proof after installation. Waste water disposal protocol is made with the institutions that will discharge the wastewater in our region, and in accordance with the protocol, the wastewater is sent to the discharge area at regular intervals by means of a vacuum truck. Withdrawal receipt records are kept for each shot. After the withdrawal, we also obtain information about the areas where the vacuum truck casts, and we examine its environmental compatibility. In accordance with the legal regulations, in case the number of personnel staying in the camp is not suitable for septic tanks, package treatment systems are installed. We carry out periodic checks of these systems, and perform their maintenance and breakdowns without delay.

Prevention of spillage-scattering and the corrective interventions in cases where it prevented the other dimensions of our waste water management. In this context, applications in our projects are

mentioned under the heading Waste Management. If we mention briefly here; in our Balıkesir Motorway Project, "Spill Response Sets" were provided containing absorbent materials suitable for the materials to be intervened directly on site. They were kept in safe and clearly marked locations and trainings were provided to employees for the usage of sets. In addition, all employees and subcontractors are obliged to report any environmental incidents. Environmental cases examined and necessary precautions and actions are taken.

Environmental teams were set up to respond in case of any environmental accident related to waste water happened in our Konya Eyiste Viaduct Project and trainings and drills were organized for measures. Environmental kits are provided for use in situations such as spill-scattering. In similar cases, subcontractors also have equipment and teams that can intervene in the same way. In case of an environmental accident, the subcontractor has an obligation to make a verbal notification within 2 hours and a written notification within 48 hours.

In accordance with the contract made with the subcontractor in our Boukhroufa Dam Project, it is responsible for immediately reporting all damages, including environmental pollution, to the Contractor due to their work, and is responsible for all damages. In this context, sub-contractors were informed about this issue.

In the Souk Tleta Dam Project, our personnel and subcontractors were informed about what to do in case of any leakage related to wastewater. In case of environmental accidents, subcontractors were notified about the project management and OHS-E teams urgently.

WATER DISCHARGE BY RECEIVING ENVIRONMENT

Project	Waste Water Source	Quantity (m³/year)	Wastewater Discharge Point and Method
Balıkesir Motorway Project	Ertuğrul Construction Camp Site	10.950	Üzümcü Stream/Biological Wastewater Treatment System
	Kızılören Construction Camp Site	2.670	Manisa Sewage System/Biological Wastewater Treatment System
Konya Eyiste Viaduct Project	Camp Site Domestic Use	1.220	No waste water discharge to the receiving environment. Septic withdrawal is conducted with a vacuum truck.
Boukhroufa Dam Project	Construction Camp Site	38.385	After biological process, it is directly given to Boukhroufa Stream.
	Stone Crusher	21.600	After the sedimentation pool, water is reused or supplied to Boukhroufa Stream with free flow.
Souk Tleta Dam Project	Construction Camp Site	16.200	With sewage system and attraction

Water Bodies Affected by Water Discharges

When we examine the water bodies that will be affected by flowing or the water we discharge within the scope of our projects;

In our Balıkesir Motorway Project, Ertuğrul Construction Site, which is our main camp site, a package wastewater treatment plant has been set up, which is sized according to the number of persons available, and the treatment plant operates on the principle of biological active sludge. According to the Water Pollution Control Regulation, waste water samples taken in regular periods are analyzed through accredited laboratories. In our Kızılören facility, connection has been provided to the existing sewage system with legal authority permissions. In our project, sealed septic tanks and sewerage infrastructure have been established in the subcontractor and supplier camp sites located in Manisa and Balıkesir provincial borders. Monthly sewer withdrawals are made by the relevant institutions and monthly shoot receipts are regularly obtained from our subcontractors. All these requirements and practices are defined in the “Water Management Procedure” and our procedure has been notified to all our subcontractors.

Balıkesir Motorway Project water discharges; Uzumcu River is approximately 56 km long and combines with Simav River, which is born from Ivrindi district of Balıkesir city and flows into Marmara Sea. It is seen that the flow from our project does not harm the biological diversity of Üzümcü Stream. Yearly average of 10.950 m³ of treated water is discharged. Waste-water assessment frequency is in line with legislation, the analysis show that we meet discharge standards. In our Konya Eyiste Viaduct Project, wastewater is collected in the septic tank due to the non-availability of a sewage system. There is no

discharge to the water bodies. In accordance with the protocol made with the municipality of the region, withdrawal is done regularly with a sewer truck. During the camp set-up phase, infrastructure has been established to collect all domestic wastewater at the same point, including our subcontractors within our camp site. The septic tank where domestic wastewater is delivered has been built in accordance with legal regulations and has a leak proof report. There is a sealed septic tank in the camp site of our subcontractor where we supply ready mixed concrete. We follow the regular withdrawal records.

Our Boukhroufa Dam Project has a package biological treatment facility depending on the number of employees. Although necessary periodic controls are provided for biological treatment, in case of any malfunction, it is planned to draw waste water with the sewage truck and move it to the treatment plant in the region. The wastewater that goes through biological treatment is discharged to Boukhroufa Stream. Since water is treated before discharging, there is no negative impact on waste water. Since subcontractor personnel are staying in the camp site owned by Nurol Construction, a common practice is made regarding the disposal of wastewater. Periodic wastewater analysis complies with discharge limits.

In our Souk Tleta Dam Project, domestic wastewater is discharged to the sewage system located in the sub-region of the site, using local septic tanks. This sewage system reaches the treatment plant in the Oued Smar region. It is known that the water coming out of the system is released to the bed of Bougdura stream and reaches to the Mediterranean Sea. In case of any blockage in the waste water systems of our Souk Tleta Dam Project, sewage service is provided.

try to reduce waste generation in cases where we cannot do this. Minimizing the amount of waste generated, re-use for other purposes, recycling and treatment options and finally waste disposal.

For this reason, we create waste management plans, identify our waste resources, monitor and report the amounts of our waste on a monthly basis. In our activities where wastes are excessively developed, we are developing plans to reduce waste. We ensure that waste is collected separately at each construction site where recycling

is possible, and we contact the licensed companies for recycling and disposal processes. In cases where licensed institutions are not available according to country conditions and legal regulations are not available, we contact organizations that will organize the most environmentally friendly disposal process. In the process of hazardous waste disposal, we work diligently and dispose of it in compliance with legal requirements.

In our projects, we have Temporary Waste Storage Facilities where our waste will be stored temporarily before being given to disposal companies. Temporary storage areas have been built in accordance with the legislative requirements and separate storage areas have been created for each waste. Waste areas are named and summary material safety forms for chemical wastes are hanged in the areas. In case of any leakage-spillage, environmental kits are available at the facility for intervention. Fire extinguishers are located against emergency situations. Authorized personnel have been assigned for temporary waste storage facilities and trainings on waste management have been provided. We also control the waste areas of our subcontractors within this scope, and support our subcontractors regarding the possibilities when necessary.



We are using this system in waste disposal processes by transitioning to the “Waste Management Application/Motat” system created by the Ministry for the delivery of our hazardous waste in 2019.

We inform our employees about waste management in recruitment training and general environmental training. We provide tool-box trainings for our personnel working in our machinery supply facilities, especially on the fields, for our hazardous wastes released daily, weekly.

In 2019, we contributed to circular economy works with our new applications. In this context, in order to reduce the use of plastic bottles in the headquarter, we started using the dispenser for drinking water and started using the dispenser in each section. Thus, we prevented the use of approximately 30.000 plastic bottles annually. Through this work, we endeavored to influence the choices they make in their daily lives by creating a serious awareness about the use of plastic bottles in our employees. We strived to encourage our headquarter employees to avoid using plastic bottles in their daily lives by giving them thermos. We also provided employees with information that will raise awareness on this issue, by encouraging bilateral use to prevent unnecessary outcomes in the office.



IN OUR NUROL CONSTRUCTION HEADQUARTERS, WE SWITCHED TO “WATER DISPENSER” FOR PLASTIC WASTE REDUCTION AND PREVENTED THE USE OF 30.000 PLASTIC BOTTLES PER YEAR.

We became a member of Materials Marketplace Platform which is a Business World and Sustainable Development Association (SDA Turkey) project, in order to demonstrate the importance we attach to the circular economy The Materials Marketplace Platform, supported by EBRD, is a cyclical economy project designed to support inter-company/industry reuse of materials (waste, by-product, etc.). As Nurol Construction, the remaining materials of the Balıkesir Motorway Project demobilization process were shared with the buyers through the project. In this way, we recycled waste materials back into use and contributed to the circular economy.

In the Balıkesir Motorway Project, within the scope of waste management works, a campaign related to waste batteries was organized, as well as the batteries used in the project, the battery wastes resulting from their personal use were included in the campaign. We launched the “Bring Back the Old Battery, Take the New” campaign and ensured that the working staff took new batteries from the warehouse provided that they brought the empty battery. This increased the amount of waste battery collection, and there was a decrease in unnecessary battery consumption. The campaign enabled us to regulate our current battery waste management. The amount of waste batteries collected in 2019 is worth 2,3 kg.

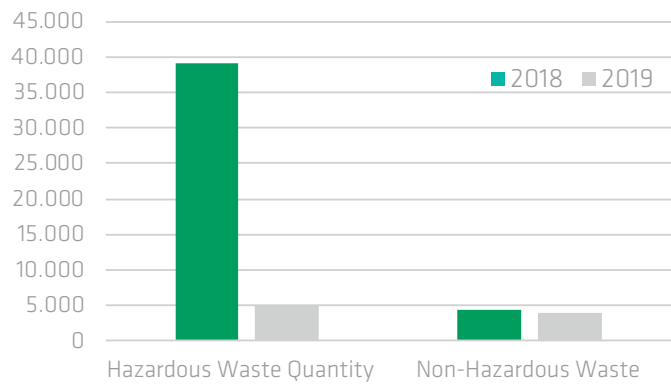
We share detailed tables in our performance evaluation section, consisting of quantities disposed and recycled according to the types and quantities of solid waste that appeared in our projects in the year 2019.



Within the scope of our Balıkesir Motorway Project, with regards to hazardous waste, 3,6 tons of packaging waste, 1,2 tons of oil, fuel filter, other hydraulic oils and vegetable waste oil and 0,16 tons of electronic waste have been generated. In the non-hazardous class, approximately 4 tons of packaging waste were exposed. While packaging wastes, other hydraulic oil, vegetable waste oil and electronic wastes are all recycled, packaging waste, oil and fuel filters have been sent to licensed disposal facilities. The total amount of hazardous waste transported is 5 tons.

Compared to our 2018, both hazardous waste and non-hazardous waste amounts decreased. In addition to the conscious act of employees and management on waste reduction, the completion of our project in 2019 while decreasing is a major factor. In our project, the rate of recycling our waste is extremely high.

BALIKESİR MOTORWAY PROJECT
AMOUNT OF WASTE AMOUNT BY WASTES (m³)



In Konya Eyiste Viaduct Project, 25 kg container, 25 kg filter, 70 liter vegetable waste oil and 3 kg medical waste have been produced as hazardous waste. 7.4 tons of domestic waste and 161,9 tons of scrap iron were released as non-hazardous waste. While domestic waste, packaging, filter, vegetable waste oil and medical waste are duly disposed of within the bounds of means available in the region where our project is located, and 161,9 tons of iron were recycled. The total amount of hazardous waste transported from the project is 123 kg. Compared to 2018, our recycling amount has increased, but our amount of vegetable waste oil has decreased. In our project, there is an increase in the amount of domestic waste compared to the previous year. There has been no business progress due to the fact that the subcontractor did not start working until the fourth month of 2018, and the winter conditions in Hadim district allowed no work progress. Due to the fact that it can be manufactured in the winter of 2019 and the subcontractor started to work, there is an increase in the amount of domestic waste.

“Form Oil Stations” have been established for form oil waste in our field in our Konya Eyiste Viaduct Project. These stations were created by using oil pails that are waste, and thus a recovery was provided from these wastes.

In our Boukhroufa Dam Project, 56.200 liters of waste oil, 1.135 life-cycle completed tires, 228 batteries and 6 kg of medical waste have been produced as hazardous waste. Approximately 71 tons of non-hazardous household waste and 532 tons of scrap waste was

BALIKESİR MOTORWAY PROJECT
WASTE MANAGEMENT (m³)



produced. Among these, 16.200 liters of oil, 178 batteries, 71 tons of domestic waste and 6 kg of medical waste were sent to disposal companies licensed. 502 tons of scrap waste was also recycled. The remaining wastes are collected in temporary waste storage areas located on our construction site and kept for disposal. In our project, there is a 12% decrease in our domestic waste amount compared to 2018.

In our Souk Tleta Dam Project, approximately 4.800 liters of oil are produced as hazardous waste, but 147,22 tons of domestic waste, about 10 tons of iron, and 10,8 tons of plastic are produced. All domestic waste and oil waste are duly disposed, and all iron waste and plastic waste are recycled. In our project, recovery is provided by using machine burn oil as form oil.

In the tables in the “Performance Evaluation Section” where waste amounts of our projects are shared in detail, it is seen that the domestic waste amounts in our Boukhroufa Dam and Souk Tleta Dam Projects are higher than our other projects. The reason for this difference is that the separation of non-hazardous wastes in our international projects is not conducted in camp sites and many recyclable wastes are collected as municipal waste and given to municipalities. Recycling facilities are very limited due to Algeria country conditions.

We take various preventive measures to prevent significant spillage-scattering and contamination before and during field activities for our projects.

Within this scope, the following activities are among the measures taken in our projects:

- Determining the procedure including the methods of intervention against leaks and spills and organizing trainings and exercises on this subject,
- Keeping the contact of hazardous wastes with the receiving environment (soil, water, etc.), keeping them in temporary waste tanks in accordance with the standards, establishing waste stations on site for hazardous wastes,
- Collecting concrete wastes from the field and transporting them to the casting sites,
- Environmental kits placed in waste area and appropriate areas on site,
- Preservation of fixed fuel tanks and fixed generators in flood concrete pools, surrounding the area and entering the area only by authorized personnel,
- Continuous maintenance of mobile fuel tanks and keeping emergency kits in mobile fuel tanks,
- Using drip pans during oil changes of work machines,

- Storage of portable generators in large drip pans at construction site,
- Storage of oils and vegetable waste oils used in machine maintenance in leakproof tanks,
- Sealing of waste-water septic tanks and regular checks
- Performing daily and weekly audits of the waste-water treatment system, meeting the minimum analysis requirements specified in the legislation,
- Preventing vehicle washing and maintenance activities on site,
- Establishing vehicle washing areas and making oil trap before exit water in case of contamination with hydraulic oil,
- Preventing waste oil from mixing with water by making oil trap at the exit of the maintenance channel
- In excavation works, firstly, the soil on the surface is stripped and stored in suitable areas to restore the land at the end of the study,
- Realizing and reporting daily and weekly field tours at Nurol Construction and subcontractor sites.

No large-scale industrial accident, spill-scattering occurred in our projects within the scope of the “Regulation on Soil Pollution Control and Point Sourced Contaminated Sites”.

BIODIVERSITY

In the regions impacted by our activities within the scope of Balikesir Motorway Project, IUCN red list species and national protection list species are included. Information on these species is presented in the table below.

Scientific Name	Common Name	Status	Comments on Prevalence	IUCN Category	National Red List
Coracias garrulus	Blue Raven	Migratory Breeding	Uncommon breeding bird	NT	VU
Sitta Kruperi	Anatolian Plasterer	Stay & Breed	A common breeding bird in the mature Turkish pine forests in and around Manisa	-	NT
Milvus Migrans	Black Rookie	Winter Visitor	-	-	VU
Aquila Heliaca	Eastern Shah Eagle	Winter Visitor	Uncommon in West Turkey, non-breeding visitor	VU	-
Falco Naumanni	Little Kestrel	Migratory Breeding	Near Balikesir city center, a small colony may exist.	VU	-
Anthyllis Hermanniae	Smart Tragacanth	-	-	-	-
Ophisops Elegan	Field Lizard, Snake Eyed Lizard	-	All regions in Turkey	LC	-
Sciurus Anomalus	Persian Squirrel	-	-	LC	-
Eurasian Badger	Badger	-	-	LC	-
Meles Meles	Badger	-	-	LC	-
Campanula Lyrata Subsp	Memek	-	-	LC	-
Thymus Zygoides	Wild Thyme	-	-	LC	-

For IUCN Red List Criteria

- **LC (Least Concern)**
Least worrying
- **NT (Near Threatened)**
Threatened
- **VU (Vulnerable)**
May be harmed
- **EN (Tehlikede)**
In danger
- **CR (Critically Endangered)**
Very Endangered

There are no species listed in IUCN red list and national protection list in the areas impacted by our activities, except from this project. In addition, there are no protected or restored habitats in our project sites.

Similarly; our projects have no significant impact on areas with high biodiversity value, except protected and non-protected areas.



For IUCN Red List Types

<https://www.iucnredlist.org/search/list?taxonLevel=Amazing&searchType=species>



OCCUPATIONAL HEALTH AND SAFETY

Occupational Health and Safety Trainings
Occupational Health and Safety Performance

OCCUPATIONAL HEALTH AND SAFETY

It is very crucial for us that our employees and stakeholders we work with are able to return their homes healthy without suffering from any occupational accidents. We approach our processes in line with the zero accident approach in our organization and underline at every opportunity that this understanding is an integral part of our culture. With this point of view, we try to spread risk-based thinking and proactive business conduct in the organization. While planning our activities, we act with a preventive perspective and we adhere to the principle of continuous improvement.

We reflect our corporate culture on Occupational Health and Safety with our "OHS Policy" and indicate our senior management's commitments on occupational health and safety in our policy. Being aware of the importance of leadership in occupational health and safety management, we first emphasize the work of our leaders in accordance with these rules. We carry out awareness-raising activities at every opportunity for our employees and stakeholders to turn working into a business manner with safe working principles.



In all of our locations, we try to implement practices above legal requirements with our ISO 45001:2018 Occupational Health and Safety Management System, as well as meeting the requirements of the legislation of the country of work. In addition to legal requirements, if there are other requirements (contract terms, specifications, etc.) that concern our projects, we periodically review our compliance status. We follow the changes occurring in legal requirements up-to-date, and inform our relevant personnel about the changes and their effects. We periodically review the work on our legal and other requirements as part of the eligibility assessment works.

We periodically review our Occupational Health and Safety Management System through internal audits, and follow up the findings obtained after the audit through our corrective action systematic. After changing our certification company in 2019, we have successfully completed the recertification audit carried out by the independent certification body BSI (British Standard Institution). We regularly check our operations to ensure that our subcontractors and suppliers we work with are providing services that comply with our corporate culture, commitments and legal requirements on OHS. We support them in order to make improvements in OHS applications in necessary areas. We inspect subcontractor sites on a daily and weekly basis, monitor and report the noncompliances we designate with

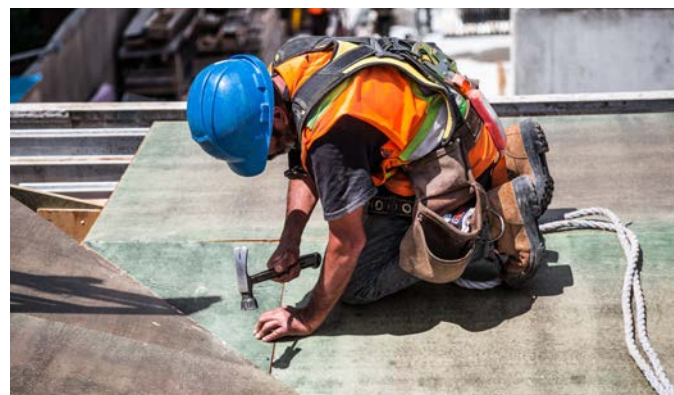
corrective action systematic. Concurrently, competent auditor teams conduct annual planned audits of our teams, subcontractors and suppliers. We do mentoring in areas open to improvement with control of compliance with laws and regulations.

Occupational health and safety teams in our projects are although experts in their fields, we provide various training opportunities to our teams in order to adapt to current developments and innovations. Project OHS teams are operationally linked to HQ Integrated Management Systems, all the procedures and instructions implemented are centrally controlled and systematically implemented in all our projects. We also carry out project-specific applications in line with the locations and activities where the projects are carried out.

In the target programs we create annually, we include occupational health and safety targets, and we follow the implementation status of the targets on a monthly basis. We try to take control if there are deviations by giving monthly returns feedback on compliance with the targets.

By determining the main hazards that we may encounter in the workplaces at the planning stage, we conduct risk assessments and follow your risk assessments up-to-date with action plans suitable for the control hierarchy. At the same time, we try to ensure that our employees are aware of the dangers they may encounter through these risk assessments. Nurol Construction employees consist of employees who follow the methods and rules we have determined, minimize unsafe acts and conditions, and adopt a culture of occupational health and safety, using the equipment and personal protective equipment delivered to it appropriately. The same practices are valid for all employees within the Nurol Construction workspace. In addition to legal training, we provide our employees with job-specific training to increase their awareness. By announcing the "OHS-E Handbook" to all employees in 2020, which we started to work on in 2019, we will effectively convey their responsibilities and rules on occupational health and safety. After our handbook, which will be published with a special character for Nurol Construction, we plan to make applications posters, visuals, etc. using the same character.

We work to ensure that our employees take an active role in our occupational health and safety management system, and we attach great importance to informing them about occupational health and safety and getting their opinions. In the OHS-E Boards that we organize monthly in all our projects, the opinions of our employees on



OHS-E issues are taken and evaluated with the employee representatives determined in our projects. Our employee representatives are expected to communicate with our blue collar personnel, who are active on site, to receive their opinions and forward them to the board.

Project Manager, Department Representatives, Workplace Doctor, Employee and Foreman Representatives participate in the OHS Committees. In our projects, we also organize OHS-E Boards and meetings, in which our subcontractor companies participate in occupational safety expert, workplace doctor and site chief.

Occupational accidents and near misses during the relevant month, unsafe movements and situations, emergency preparations, OHS and environmental actions, periodic controls, training plans and activities, annual occupational health and safety plans and evaluations, employer declarations, open topics for complaints and improvement recommendations are the meeting agenda for the related month. At the end of the meeting, the resolutions of the meeting are recorded and announced for implementation. Decisions are also announced via bulletin boards.



AS NUROL CONSTRUCTION, IN CASES WHERE IT IS NOT LEGAL OBLIGATION TO ESTABLISH AN OHS-E BOARD (DIFFERENT COUNTRIES, NUMBER OF EMPLOYEES, ETC.), WE FORM AN OHS-E BOARD FOR THE PROJECTS AND HOLD MONTHLY MEETINGS.

In addition to the committees, OHS meetings are held regularly at the time intervals determined by each project, and subcontractor OHS representatives are also involved in these meetings. Depending on the issues, subcontractor project manager/site supervisors are also asked to participate.

Another platform where we obtain opinions of our employees is "Nurol Construction Family Talks Organizations". We obtain opinions of our employees on occupational health and safety, evaluate them and follow their actions in organizations held every 3 months at least.

By making a change in 2019 regarding the agenda items of the

"Headquarter Coordination Meetings" held in our General Directorate and the "Weekly Coordination Meetings" in our projects, we brought the necessity to include the subject of quality and OHS-E in the first agenda items. In this way, we think that the occupational health and safety speech of all process leaders attending the meeting is a priority for our corporate culture.

We share all the occupational health and safety practices we have conducted with the senior management in quarterly board reports. We also present our occupational health and safety performances to senior management at annual Management Review meetings.

OCCUPATIONAL HEALTH AND SAFETY TRAININGS

We believe that occupational health and safety training is an important guide for our employees, and we have definitely observed the positive effect of providing effective training in accordance with the needs in OHS practices. We follow up-to-date developments in order to provide trainings in accordance with new technologies and systems in order to raise awareness and raise consciousness among our employees. We especially consider our activities on site and we organize our trainings by focusing on the parts that our employees lack. We strive to carry out visually rich interactive training programs.

Considering the implementation status of the trainings planned for the previous year, we conduct training needs analysis for our trainings that we will carry out during the year and determine our annual training plans according to these analysis.

We provide orientation training for all our personnel who are employed in our headquarter and projects, and then complete the basic health and safety training, in a frequency and duration as

determined by the legislation. Along with orientation training in our projects, our employees are given specific employment commencement training, where the dangers that may occur in the project region and what needs to be done, the description and requirements of the job are conveyed. Annual trainings are planned for the emergency, OHS Board and risk assessment teams as required by the legislation, and employee representatives are informed by trainings. We organize professional qualification training for our employees for the professions that are required by law. With the same perspective, we check the professional competence documents of subcontractor employees. We conduct on-the-job training before starting work in daily activities, and remind our employees of the dangers and rules.

We prefer single-point trainings in order to improve the behavior of our employees in accordance with the action plans, related to emergencies, which is one of the most important issues. We update



IN 2019 25.539 PERSON.HOURS OHS TRAINING

the trainings of our emergency teams before and after the emergency drills, and remind our employees of all the information received about the emergency through annual trainings. By sending our first aid teams to the first aid training organized by the Ministry, we ensure that our teams become certified first aiders.

In addition to our legal trainings, we plan project-specific trainings for our activities that are not mandatory but seriously dangerous, and repeat our trainings in frequent periods. In the subjects that will ensure the development of our OHS professionals, trainings are organized by the Headquarter Integrated Management Systems, and organizations that all teams will participate in are organized.

We provide safe driving training for our personnel using vehicles in our headquarters and projects, and we ensure that related accidents are minimized. In 2019, we organized "First Aid Awareness Training" for our chauffeurs working in the headquarter, and thanks to this training, we increased their competence in responding to emergency

situations. In 2020, we aim to raise awareness on the management of behavior while driving, by organizing "Psychology in Road Safety" for our drivers.

In 2019, various trainings have been given in our projects in terms of signaller-rigger, safe lifting operations, working at height, scaffolding installation, use of chemical materials, and personal protective equipment, considering the dangers in our activities. We try to involve our subcontractor employees in some of the trainings we have provided, and we also support them in trainings. We also monitor the status of our subcontractors to perform their legal training, and encourage them to provide training outside of legal training.

The training amounts received in our headquarter and projects in 2019 are presented through the table below. Our detailed training tables are included in our performance evaluation section. In 2019, 25.539 person.hours of environmental training was provided in our reports and our headquarter.

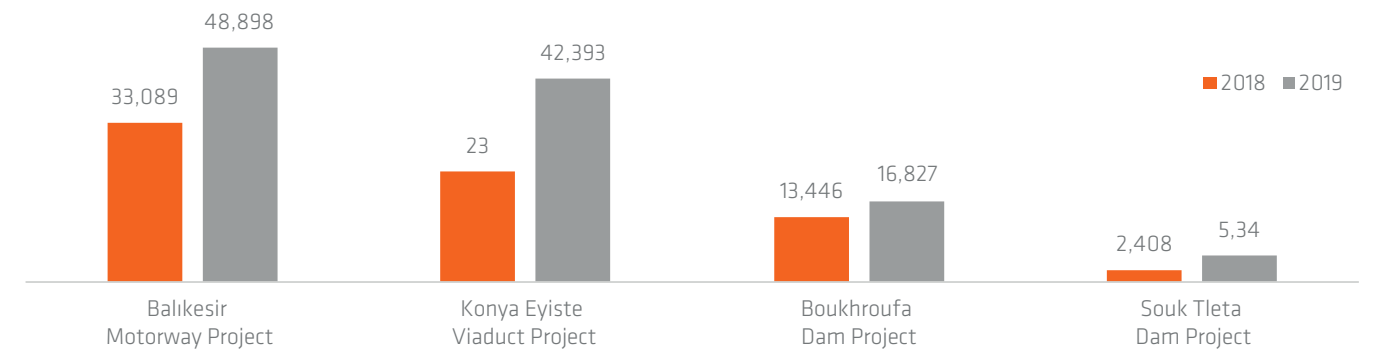
TRAINING HOURS ABOUT OHS - 2019

	Total Training Hours (person.hours)	Training Hour Per Employee (hour/employee)
HQ	237,5	3,644
Balıkesir Motorway Project	17.429	48,898
Konya Eyiste Viaduct Project	3.631	42,393
Boukhroufa Dam Project	3011	16,827
Souk Tleta Dam Project	1.230	5,34
All Trainings		
HQ	2.231	34,344
Balıkesir Motorway Project	17.752,75	50,630
Konya Eyiste Viaduct Project	3.823,5	44,594
Boukhroufa Dam Project	3.583,5	19,309
Souk Tleta Dam Project	1.508	6,582

When we examine the training data in our projects, it is seen that the amount of training in all projects increased compared to 2018. Our graph comparing the training data of 2018 and 2019 is given below. While there is a 48% increase in our Balıkesir Motorway Project compared to 2018, trainings increased 84% in our Konya Eyiste Viaduct Project. Our Boukhroufa Dam Project has increased its OHS trainings by 32%. Although our Souk Tleta Dam Project has a low training rate compared to other projects, it is the project that has increased its training activities the most annually.

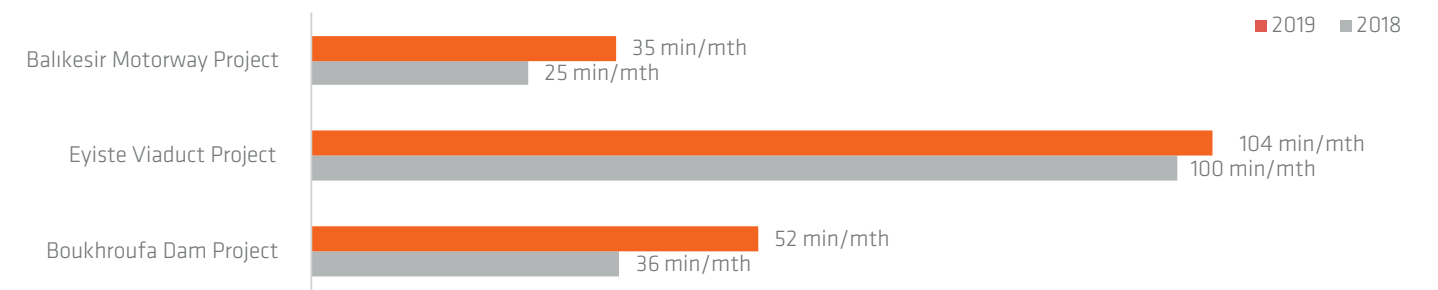


TRAINING BY YEARS (HOUR / EMPLOYEE)



Apart from our legal trainings, we try to increase our OHS trainings, and we set targets for these trainings annually for our projects. When we compare 2018 and 2019 with our OHS-E trainings given to our Nurol Construction staff, we see our projects that increase the amount of training in the graphic below.

NON-COMPULSORY OHS-E TRAININGS (MONTHLY TRAINING RATIOS)



OCCUPATIONAL HEALTH AND SAFETY PERFORMANCE

We follow our performance on Occupational Health and Safety with the key performance indicators we have determined, and we take actions to improve our performance according to the output we obtain. By setting annual targets for our OHS performances, we revise these targets in line with the principle of continuous improvement every year.

Our activities are in a very dangerous business sector. Therefore, we take appropriate measures for our activities that have special risks. Despite the difficult conditions we work in, our total accident frequency and total accident weight ratios are below the sector average.

Nurol Construction has defined the processes of examining the events related to occupational health and safety as a result of our activities in the "Incident Investigation Procedure" and we evaluate the occupational health and safety events that occur in our projects

within the framework of this procedure. In our projects, Incident Investigation Teams consisting of project manager, relevant department chief, related engineer, workplace doctor/nurse and form are established under the coordination of OHS-E manager, and the teams are responsible for carrying out the incident investigation process. We examine the events under two sections as "Major Incident Investigation" and "Minor Incident Investigation", and determine our response methodology according to the type of event.

We conduct a root cause analysis to determine the actions to be taken after the events that occur, and take actions for the root cause of the event. In 2019 we migrated all our accidents occurring in our projects to our QDMS Integrated Management Systems software system. It is included in the HQ Integrated Management System approval process at the stages of determining the root causes of the events that took place in 2019 and determining the actions accordingly, and the actions

determined through the QDMS system are approved after the control of the Integrated Management Systems Department.

All our employees have an obligation to report an accident. Our subcontractors are obliged to inform us of an accident instantly, create the incident report, collect necessary documents for the accident notification and convey it to us, report to SSI in case of accidents in lost time within the official time, perform the actions determined after the accident in full and notify us. It is among the responsibilities of the subcontractor to ensure that all OHS measures are taken during the works and to inform the employees in this regard in order to prevent accidents again.

Some operational measures we have implemented for risky activities in our projects are as follows;

- Recruitment medical examinations of all our project employees and subcontractors are made, and their medical examinations are renewed annually.
- Anti-fall systems and appropriate personal protective equipment are used in high works. In our Konya Eyiste Viaduct Project, the precautions to be taken for climbing mold and formwork trolley systems to be used in balanced console manufacturing for working at height, are planned by discussing with the manufacturer company and special solutions are provided when necessary. Facade lifts are used to access high work areas.
- Functionality of the scaffolding and platforms used are checked with lists before and after use.
- Red and green labeling are applied for scaffolding and platforms, red labels are placed on improper scaffolding platforms and their use is prevented.
- Traffic Management Plans are being prepared for traffic management applications at the project site.
- Periodic audits are made for all lifting equipment and pressure vessels used in the project, vehicles without inspection are removed from the field.
- Before the lifting operations, the lifting plan is prepared and the relevant personnel, duties and responsibilities are transferred.
- Daily controls of the construction machines are carried out by the operators and are recorded with the control form, daily breakdown maintenance is recorded.

- Construction machines are used only by authorized/certified operators.
- Blasting work permit systematic is applied for blasting operations.
- Power tools and cables are checked and periodically controlled by the responsible electrician before starting work. Earthing measurements of electrical equipment are carried out once a year.
- Color coding is applied for electrical equipment and electrical controls are performed in accordance with the color code procedure.
- Appropriate storage conditions are provided for chemical materials used in project activities, material safety data sheets were provided and hung in the storage areas.
- In our projects, noise, vibration, dust emission and lighting measurements are made once a year and actions are taken for inappropriate values.
- It is ensured that the work sites are organized.
- All personnel are provided to use personal protective equipment specific to the work.
- There are fixed, permanent or temporary warning signs according to the risks in the work site.

In order to disseminate the acquired experiences of work accidents within the company, work accidents with more than 10 days of loss in our project are forwarded to the incident review e-mail group in which all the reports include general manager, deputy general manager, group managers, project managers and OHS-E teams. In this e-mail group, along with the major accident results, the project is informed by the OHS-E Manager about the works to be done to eliminate the main causes in preventing the recurrence of accidents.The information about the actions to be taken and the accident investigation team's information published via this group.

Detailed information and explanations about our OHS performance are included in the “Performance Evaluation” section of our report.The total number of accidents, the number of accidents with lost days, occupational injury and serious injury rates are given below.

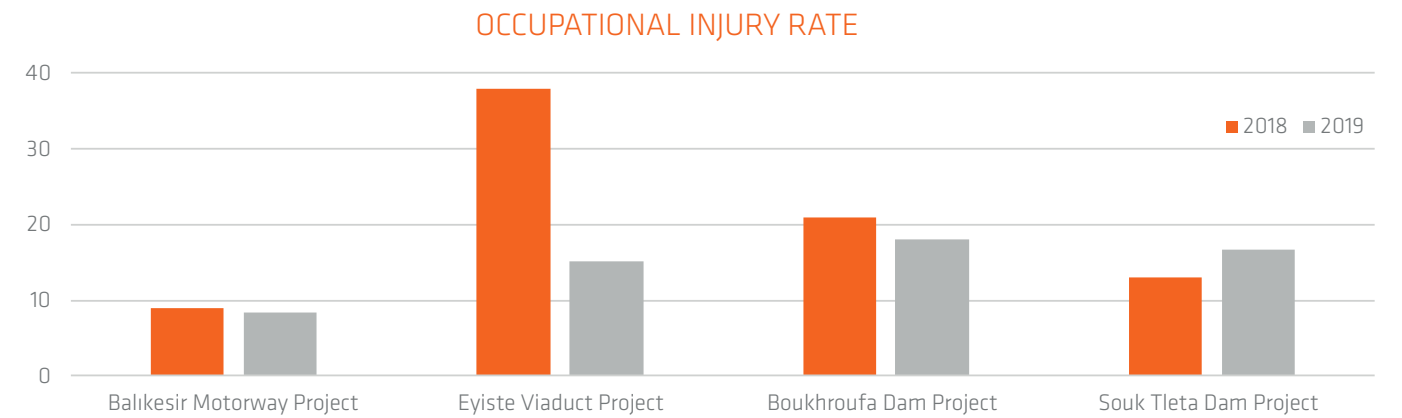
Our accidents requiring first aid are not included in our lost day accident numbers. Accidents with one or more lost days are included in the "number of lost day accidents". While calculating the serious injury rate caused by work in 2018, we made our calculations by including the number of fatal accidents on the day of loss. Since GRI 403: Occupational Health and Safety 2018 standard does not include fatal accident numbers in the formulas in section 2.1.4 of section 403-9, the calculations for 2019 were made accordingly.

TOTAL ACCIDENT NUMBER, FREQUENCY AND WEIGHT RATIO - 2019

	Number of Accidents	Number of Accidents with Lost Days	Occupational Injury Rate	Occupational Serious Injury Rate	Total Working Hours
Balıkesir Motorway Project	22	4	8,43	1,53	2.609.208
Konya Eyiste Viaduct Project	4	0	15,14	0	264.276
Boukhroufa Dam Project	15	12	17,97	14,37	834.827
Souk Tleta Dam Project	12	9	16,68	12,51	719.376

Not : Calculations were made using the formulas below.
Work Related Serious Injury Rate = Total Number of Accidents/Total Working Hours x 10⁶
Work-related Injury Rate (Except for fatal accident) = Number of lost-day accidents (Except for fatal accident) Total Working hoursx10⁶

When we review our 2019 accident data, a general decrease in our accident numbers compared to 2018 can be seen. Our total work injury rate has decreased in 2019 due to the decrease in our total working hours. In our Balıkesir Motorway Project, 22 cases occurred in 2019, 19 of which belong to our subcontractors. 11 of these accidents were material damaged accidents. 6 of them resulted in an accident requiring first aid. The remaining 4 accidents were recorded as lost time.No lost day accident has occurred in our Konya Eyiste Viaduct Project, and all 4 accidents that occurred there did require first aid. 12 of the 15 accidents in our Boukhroufa Dam Project were lost-day accidents and 2 of the lost-day accidents belonged to our subcontractor personnel. Compared to the previous year, a significant decrease is observed in our occupational injury rates. In our Souk Tleta Project, where 9 accidents with lost days occurred, the decrease in working hours in 2019 is effective in the increase in the frequency of the accident compared to last year.



We value OHS for our supply chain too, and we included our practices in the “Value Chain Management” section.



VALUE CHAIN MANAGEMENT

Sustainability for Supply Chain
Supply Chain Environmental Audits
Negative Environmental Impacts in Supply Chain and Actions Taken
Social Impacts and Actions in Supply Chain
Subcontractors and Suppliers by Projects

VALUE CHAIN MANAGEMENT



PROVIDING PRODUCTS AND SOLUTIONS THAT PERFECTLY MEET THE CUSTOMER NEEDS IS THE ULTIMATE GOAL OF NUROL CONSTRUCTION. ESTABLISHING HEALTHY AND SECURE COOPERATION WITH ITS VALUE CHAIN IS THE ESSENCE OF THIS GOAL.

As Nurol Construction, we create a developer relationship with our suppliers and subcontractors by creating a working environment based on partnership. With this expectation, we aim to improve our operations by creating a reliable supply chain (product/service), and we try to benefit our stakeholders. To provide the output of the benefits we generate, we want to ensure economic and social outcomes by contributing to them to become structures that serve in a sustainable structure in our supply chain.

Herein below, we summarize our general approach for using subcontractors and/or suppliers and the circumstances where we prefer to use subcontractors/suppliers:

In the projects where we act as employer; our wish to focus on project management renders partnerships with subcontractors and suppliers attractive due to the ability and speed of subcontractors providing employment, flexible working structures and cost advantages. Besides; we also prefer to partner with subcontractor and suppliers where special expertise required and the related business volume does not cover the investment cost.

In accordance with the Articles of Association of our company, we determine the most suitable subcontractor that can share the responsibilities to the Employer and ensure that the related activities of the subcontractor are followed. By making periodic evaluations of subcontractors, we ensure that a database about subcontractors is created at the end of the job.

We select our subcontractors based on the criteria set out below and evaluate their activities within this scope.

- If it is a company that has not worked with us before, it is requested to document similar completions.
- In companies that have worked with us before, the performance score is checked.
- Technical (compliance with specifications, documentation requirements, machinery and equipment) competence is requested from the companies that will participate in the tender.
- Assessments are made on quality and OHS-E issues.
- Documentation indicating that the company is financially solvent and does not have any outstanding tax and SSI debt is requested.

Nurol Construction is a member of the Women's Empowerment Working Groups established by UN Global Compact Supply Chain Secretariat Turkey. Since the use of subcontractors is high in our sector, we care about the works related to the supply chain and we try to support the increase of sectoral prevalence. In this context; within the scope of the activities carried out connected to the Supply Chain Working Group, we aim to share our experience with our subcontractors, disseminate good practice examples in the sector and improve our subcontractor management processes.



WE SHARED DETAILED TABLES ABOUT OUR SUPPLY CHAIN IN OUR PERFORMANCE EVALUATION SECTION OF THE REPORT.

SUSTAINABILITY FOR SUPPLY CHAIN

Our company's reputation by the institutions and organizations is undoubtedly related to the principles of ensuring trust, justice and sustainability in all its activities. We treat all our customers, suppliers and subcontractors equally fairly, responsibly and ethically considering the related laws and regulations.

In selecting the subcontractors that will undertake the execution of Nurol Construction's projects, we follow the stages of preparing tender files, collecting and evaluating the offers, obtaining the necessary approvals in accordance with the size of the work package, selecting the subcontractor to do the work, preparing the contract sets and signing it to the subcontractor in all our projects and we are managing these processes centrally in all our projects. In order to carry out this process more effectively, we also published the "Subcontractor Tender and Selection Procedure" and forms describing this process in 2019.

The "Subcontractor OHS-E Assessment Form", which we introduced in 2018 to include environmental and social issues in the subcontractor selection processes, was published by the Central Integrated Management Systems Department in 2019. The form contains questions that inquire the subcontractor's competencies in environmental, OHS and social issues. This record, which is included in the tender dossier, contains the subcontractor's quality, OHS and environmental management systems competencies, policies, organizational structure of the OHS-E teams, OHS and environmental non-compliance management, accident data, camp site conditions, training, the process of ensuring legal conditions, risk management, the OHS measures it plans to take on site, how it is included in the participation and consultation processes of the employees, and requests records proving their practices in these issues. The evaluation form received from the subcontractor is evaluated by the OHS-E Department Managers of the projects. Then, a report is prepared and sent to the department that prepares the tender. With this application, while aiming to work with organizations that have

higher OHS-E performance in the subcontractor selection process, we also aim to raise awareness on sub-contractors on OHS-E issues during the tender stage.

In addition to the subcontractor contracts made in our projects, the "OHS-E Specification" includes general principles regarding occupational health and safety and environmental issues that the subcontractor will apply during its activities. Subcontractor agrees that it will fulfill all the legal requirements related to OHS and the environment together with the OHS-E Specification, and will continue in accordance with ISO 45001 and ISO 14001 standards, zero accident culture, best practices, current OHS and environmental policies, procedures and plans of our company.

During the project, we hold regular meetings with our subcontractors and discuss their environmental and social performances at these meetings. The decisions taken at the meetings, the results of which are recorded, are then followed. Meeting minutes are notified to our subcontractors.

We also measure the performance of our subcontractors at least once a year with performance evaluation forms. We also evaluate our subcontractors, who finalize work during the year, at the end of their work. At the end of the year, subcontractors are categorized by the HQ Integrated Management Systems Department according to the scope of the contract and the performance evaluation results are analyzed. The tables where the performance evaluation results are analyzed according to the fields of work are shared with the Business Development, Tender, Project Control Departments and sent to all our projects. In sub-contractors working in different projects, separate evaluations are made for each project, and the value resulting from the average scoring is taken into account as sub-contractor evaluation points by considering all evaluation results. It is planned that the evaluation process of the subcontractors will be followed via our ERP program SAP in 2020 which we started to work this year.



NUMBER OF SUBCONTRACTORS, THE PERFORMANCE OF WHICH ARE EVALUATED IN 2019: 142

In order to recognize our suppliers technically and commercially, we generate a "Supplier Database" at our headquarter and projects. At the beginning of our business relation with our suppliers, the information is obtained from the supplier candidate for the database by the Purchasing Department and this information is entered into the database. After our business relation with the supplier ends, we evaluate the performance with the "Supplier Performance Evaluation Form". In our first work with our suppliers that are not included in the supplier database, we make our choices considering the criteria such as references about the company, impression visits, recognition of the company, job completion competence, qualified trained personnel structure, information performance about the material at the offer stage and after delivery.

Supplier performance evaluations are carried out annually under the responsibility and coordination of the Purchasing Department, and we evaluate the supplier as "Unworkable, Development Group and Long Term Working Group" according to the score it receives. In our evaluations, we take into account the company's compliance with the environment and OHS as well as technical issues. In our projects, supplier evaluations are made through ERP programs, and all of our evaluation questions have been transferred to the SAP system we passed in 2019, and works have started for its use.

By including our subcontractors and suppliers in the OHS-E Boards and OHS-E coordination meetings we organize in our projects, we increase our awareness of the environment and OHS issues, and we

contribute to their processes by sharing our practices with them. We include our subcontractors and suppliers in our planned trainings and make suggestions for the development of training programs. In addition, we plan second-party audits for our subcontractors and suppliers at the beginning of the year, and together with our internal auditor teams, we audit these stakeholders within the scope of OHS and environmental management systems, especially compliance with legal requirements. At the end of the audit, we prepare an audit report and share the audit report with the subcontractor/supplier company officials via e-mail and official letter. We conduct a follow-up the findings in accordance with our corrective action systematic.

Along with the findings, we provide mentoring to them in matters that are open to improvement. We share our own practices and contribute to their development.

In our projects, we do not compromise on the personnel rights of our subcontractors, and we carefully follow the legal processes of the subcontractor employees since their employment.

We also inspect our subcontractors we work with during the annual internal audits and follow the deviations that we detect. In addition, our subcontractors are observed in environmental and OHS issues during daily and weekly field audits in our projects and their non-conformities are reported to them.

SUPPLY CHAIN ENVIRONMENTAL AUDITS

The environmental audits conducted for suppliers in 2019 according to projects are as below:

BALIKESIR MOTORWAY PROJECT

"The effects of the company on the environment and employee health" are among the criteria we observe in the selection of our project. In the researches about the company, the firm's awareness of the environment and the compliance of the raw material it uses with the environment and worker health conditions are discussed. In the planned quality, OHS, environmental and legal requirements audits we have conducted on our main suppliers, the company's compliance and practices with the law on environmental issues are questioned, and the processes that need improvement and corrective action are identified and corrected. At the end of each year, with the "2nd Party Audit Plan" our subcontractors and main suppliers are planned to be audited on quality, OHS, environmental and legal requirements. In 2019, one supplier and 13 subcontractor audits were carried out, and a total of 7 main supplier and 30 subcontractor audits were carried out throughout the project. As of the end of 2019, 575 findings were detected in these audits. 62 of them were identified on the subject of environment, 455 on the subject of OHS and 58 of them on quality. For each of these findings, an action was taken and finalized within the joint time schedule shared with the audited parties.



Compliances	Nurol Construction Daily Field Detection	Principal Employer Identification	Credit Institution Supervision Agency Detection	3. Party Audit	2. Party Audit (Subcontractor-Suppliers)
Waste Management	32	2	5	3	8
Waste-Water Management	3	-	-	-	-
Soil Pollution	3	-	-	1	2
Dust Emission	2	-	2	-	-
Environmental Awareness	-	-	-	-	3
Environmental Risks	-	-	-	-	1

Periodic performance evaluations of our suppliers are carried out under the coordination of the Purchasing and Warehouse Department. Among the items questioned for performance evaluation, the subject of "compliance with environmental and OHS related rules" is handled and points are given. Our subcontractors are evaluated annually with performance evaluation forms, and environmental issues are included in this evaluation.

As a result of planned audits to ensure sustainability in our supply chain, determinations and determined improvement steps in daily audits conducted within the activities of our project are followed by the Purchasing, OHS-E and IMS departments.

KONYA EYISTE VIADUCT PROJECT

In our project, we inspect our subcontractors daily and weekly in their fields of activity. At the same time, we include our subcontractors on site tours to which the project management also participates, and we inform them in writing of the non-conformities we detected during the field tours. More than 120 field audits have been carried out since the beginning of the project and the findings were followed up with site observation reports and corrective actions. In 2019, we carried out an audit that creates improvement and awareness in quality, environment and OHS issues with our internal auditor teams in our main supplier company, where we supply pot bearings. At the end of the audit, 39 corrective actions were initiated and we reported 2 findings as an opportunity for improvement. Five of the findings were related to the environment. As of the end of 2019, the Second Party Audit Plan for 2020 has been prepared and 4 main suppliers have been included in the scope of the audit.

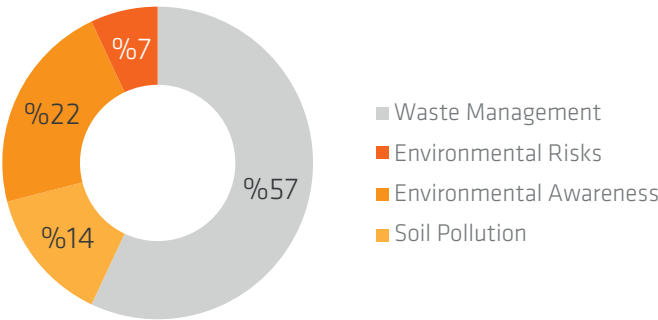
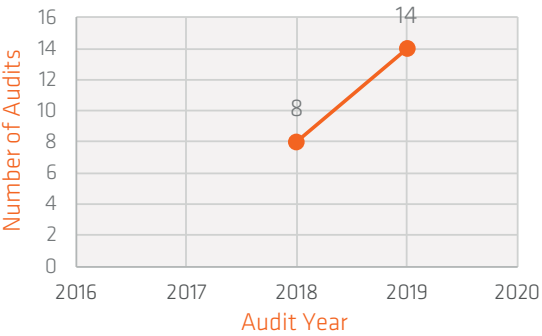
BOUKHROUFA DAM PROJECT

We constantly monitor our subcontractors, who carry out our on site activities , and report and monitor the findings made by our management and OHS-E teams through official writing or corrective action. We conduct field tours with project management and OHS-E teams monthly. We inform our subcontractors with site tour reports. We carried out environmental meetings in 3-month periods in order to better resolve the missing or required developments after the field audits we conducted to our subcontractors in 2019. At the meetings, we discussed the necessity of working in line with our environmental policies that we have determined during the field audits, waste oil storage and disposal, what to do in case of environmental accidents, planning an environmental drill, insufficient countermeasures against the dust, paying attention to fauna life, hanging the warning signs on site and the storage of hazardous waste left. In this way, as Nurol Construction, we increased our communication with the subcontractors and determined the subjects that we will support them regarding the actions to be taken. We advised on actions to be taken by subcontractors. At the end of the meetings, we provided vehicle support for transporting hazardous wastes on site to our waste storage area, and petroleum support to reduce the effect of dust. We suggested that we use the oil storage areas of our project for waste oils, and thus, we took dangerous wastes under control.

SOUK TLETA DAM PROJECT

As the project management, we inspect our subcontractors monthly with site tours, we evaluate the activities in terms of OHS and environment with the field audits made by our OHS Department daily. We are communicating the noncomplying items to them in writing. We evaluate the performances of our subcontractors annually and perform these evaluations in a way to include environmental issues. In the event of a finding related to the environmental performance of our subcontractors during the field audits, we monitor the closure of the finding and ensure environmental improvement.

NUMBER OF SECOND PARTY
AUDIT BY YEARS



NEGATIVE ENVIRONMENTAL IMPACTS IN SUPPLY CHAIN AND ACTIONS TAKEN

We provided the details of negative environmental impacts in supply chain and actions taken as below:

BALIKESIR MOTORWAY PROJECT

Findings related to environmental waste management, soil pollution, environmental risks and environmental awareness were identified during the audits of 1 supplier and 13 subcontractors which were carried out within the scope of our Balikesir Motorway Project in 2019. These noncompliances were closed with activities that prevent recurrence. Waste areas have been arranged by subcontractors and suppliers in accordance with the legislative requirements. Storage methods of chemical materials have been improved. Employees have been informed on this issue and material safety data sheets have been provided. Up-to-date analysis of wastewater that need to be monitored periodically have been made and systematic has been established for their follow-up. Despite the contamination of the waste chemicals with soil, cleaning operations were carried out, hazardous waste disposal was made, environmental kits were provided as a precaution and training was given to the employees. Following the legal process for periodic disposal of chemical materials, trainings were carried out to further develop environmental risk assessments, and environmental risk assessments were updated. No environmental impact has been identified in subcontractor and supplier areas, exceeding legal requirements.

BOUKHROUFA DAM PROJECT

In 2019, while inspecting our subcontractors, it has been determined that there were inadequacies in environmental matters, storage and disposal of hazardous wastes, precautions to be taken in case of chemical spill-scattering, reduction of dust's impact on the environment, effect of activities on fauna life, hazardous wastes uncontrolled on site, and environmental cleaning. In this context, actions to be taken by our subcontractors were informed to them and the process was followed. During this phase, it was decided to use Nurol Construction waste area for temporary storage of waste. An action plan was prepared for the effect of dust on the environment, at the same time, additional plots were provided with the support of our project. Precautions were taken by marking the animal passageways within the project. All employees were informed about the hazardous wastes on site in the Nurol Construction waste area. At the same time, an exercise is planned for the measures to be taken in case of an accident. Environmental cleaning was carried out in coordination with Nurol Construction. Action was taken to prevent recurrence of nonconformities.

There has been no non-compliance finding that would have a serious negative impact on the environment.

SOCIAL IMPACTS AND ACTIONS IN SUPPLY CHAIN

As Nurol Construction, we pay attention to all the legal rights of our employees with great care, as well as the legal rights of our stakeholders working with us. The legal processes of our subcontractors working on our sites are monitored by our projects, and they are ensured to comply with the legal requirements we are subject to. Salary and SSI payments are tracked from the start of employment of a subcontractor, and whether it is suitable for work is evaluated, then such subcontractor is sent to work on site.

Depending on the line of business we conduct, our headquarter and projects are subject to the Social Insurance and General Health Insurance Law no. 5510, the Labor Law no. 4857 and we work in coordination with Turkish Employment Organization, Ministry of Labor and Social Security and tax offices where we are registered. In

KONYA EYISTE VIADUCT PROJECT

The items identified on environmental issues in our audits for suppliers are related to improper storage conditions of chemical materials and chemical waste. In order to correct the findings designated in this scope and prevent repetition, the storage conditions of the chemical materials were improved by the subcontractor, the relevant warning signs and material safety forms were hung in the appropriate areas and all chemicals have been identified. Temporary waste storage areas were established in accordance with the legislation conditions for waste chemicals. Upon identifying these items regarding our subcontractors, improvements were made in the waste fields, waste stations have been established for the control of hazardous wastes on site, and the repetition of noncompliances was prevented by providing related training to the employees.

In the audits we have conducted, no findings that have a serious negative impact on the environment have been identified.

SOUK TLETA DAM PROJECT

As a result of our audits, the main environmental issues we encounter in our subcontractors were waste separation, hazardous chemical spill-scattering, environmental cleaning, and we focus on these issues and produce solutions to prevent repetition. We constantly make warnings and organize trainings for our subcontractors to raise awareness of employees in their environmental nonconformities. In 2019, there was no incident in our subcontractors that had a negative impact on the environment.



our overseas projects, as in our country, although there is no obligation to obtain subcontractor insurance number depending on the Employer insurance number; subcontractors are inspected monthly for uninsured, forced and child labor. Our Algeria Projects have not been subject to any penalties by government agencies that supervise regular payments, annual leaves, residence permits, local staff recruitment, and health control of employees.

In 2019, we did not find out any uninsured personnel in the subcontractors operating within the scope of our projects. The medical examinations, orientation training and occupational safety instructions of the personnel to be recruited within Nurol Construction are completed one day before the employment. After the notification processes are completed, the PPE's related to the task they will

perform are debited to them and the personnel starts to work. Due to the fact that our project is included in the "Extremely Hazardous Occupation Classification" and in accordance with the legal regulations, forced labor and child labor are prohibited. Compliance checks of this law are also closely monitored by daily site controls and audits, as well as by checking the lists of personnel and SSI accruals and personal documents. Within this area of responsibility, a child labor incident has not occurred so far, both in our subcontractors and in our suppliers.

In the projected "Second Party Audits" to our main suppliers and subcontractors (in addition to OHS, environment and quality issues), compliance with 5510 Social Insurance and General Health Insurance Law, 4857 Labor Law and 6331 OHS Law legal requirements such as employment of child labor, employing workers without SSI, obligation to employ disabled people etc. are also inquired. Plus, the lists of personnel and disability employment are made by checking the health reports of disabled personnel and checking them according to the SSI accruals by months.

In accordance with the obligations arising from the law numbered 4857, the controls of the rights and receivables of the sub-contractor personnel in the relevant period are conducted by our Accounting Department in our projects. In spite of these checks, if we receive written or verbal notification from employees of the subcontractor, the reasons for these grievances and whether the complaints have grounds are checked and the grievances are remedied immediately. In addition, the rights of all employees in our project are ensured in contracts with subcontractors.

Service lists and accruals, payroll and salary payment receipts of all of our subcontractors operating within the scope of our projects are requested from the related persons by e-mail or telephone calls at the

SUBCONTRACTORS AND SUPPLIERS BY PROJECTS

Main subcontractors of our Balikesir Motorway Project are groundworks, superstructures, large art structures and secondary works companies. Since our Balikesir Motorway Project was commissioned in 2019, the precise calculation works of subcontractor companies have commenced. 98% of our landscaping works have been completed in 2019, and secondary works have a 98% completion rate. The suppliers are the companies engaged in the supply of concrete, aggregate, expansion joints and pre-stretched steel rope.

The main subcontractors within the Konya Eyiste Viaduct Project are the companies that provide viaduct reinforced concrete works, viaduct post-tensioning works, earthworks and rental equipment. The suppliers are companies operating in the supply of concrete, iron, aggregate and steel rope. The Konya Eyiste Viaduct Project has been amended in the viaduct reinforced concrete subcontractor, which has the largest share in 2019. The tower crane, exterior lift, balanced cantile formwork systems, which are under the responsibility of the company, which is a reinforced concrete subcontractor, has been transferred to our company. Due to the economic recession and sectoral tightening, matters such as machinery (tower cranes, front elevators etc.), special formwork systems (mold cars), which are included in the scope of the work of the subcontractor groups we work due to the deterioration in the financial structures of the subcontractor and supplier groups, are excluded from the contract. It has been decided that Nurol Construction will carry out the material and service processes by leasing or purchasing with the relevant manufacturers and suppliers.

The main subcontractors within our Boukhroufa Dam Project are companies engaged in earthworks and concrete work. The suppliers are additives supply, sand supply companies. Our firms, which are supplied with corks, iron, steel, explosives, sand, gravel, stone chips, are our other suppliers.

end of each month. The documents provided are stored for archiving in the file of each subcontractor. Regarding salary payments, no serious situation has been encountered so far as a result of checks. When we have subcontractors that complete their activities, these archived files are important for closing processes. Our subcontractors pay SSI and send their payment receipts to Nurol Construction Human Resources Department. In case our subcontractors have defaulted on SSI and labor salaries, they notify us in writing. Upon this notification, SSI and labor payments of such subcontractors are made by Nurol Construction on their current accounts following the approval of the Project Directorate, and such amounts are deducted from their progress payments. Following this letter, the SSI and labor payments of the companies related to the approval of the Project Directorate are made by Nurol Construction for their current accounts and deducted from their progress payments.

Our Balikesir Motorway Project, which entered the demobilization process in 2019, has increased environmental and social follow-up with the efforts to remove the construction sites and material warehouses from the land after the rent has expired, and the lands of the citizens have been cleaned and returned in accordance with the conditions and laws written on the consent. During the commencement and continuation of the works for delivery, the communication was made with the relevant owners and the surrounding settlements and efforts were made to prevent victimization.

In order to avoid such basic problems with our subcontractors, we take a proactive approach by evaluating the perspective and measures of the subcontractor to ensure the personal rights of the employees of the subcontractor in the "Subcontractor Selection Process OHS-E Evaluation Form".

The main subcontractors within the Souk Tleta Dam Project are companies that carry out concrete works, drilling and grouting works and hydromechanical works. The suppliers providing us stone, iron and cement.

We have included detailed tables that indicate the ratio of Nurol Construction subcontractor and supplier expenses within the project budgets in the "Performance Evaluation Section". In our Balikesir Motorway Project, since subcontractors of earthwork operations, large engineering structures and superstructure works constitute the highest proportion in the budget and have higher effects on the sustainability performance of Nurol Construction, these subcontractors were included in the second-party audit processes and they have been checked through frequent site visits. The noncompliances found were followed up and corrected. Through their reporting, their performances were followed and they were included in the training activities carried out in our project. In the Konya Eyiste Viaduct Project, the sustainability performance of the viaduct reinforced concrete works subcontractor, which constitutes the highest proportion in the budget, was regularly monitored. The current status of the subcontractor was examined for all performance indicators monitored for sustainability. Subcontractors for earthworks in our Boukhroufa Dam Project, and drilling and grouting in our Souk Tleta Project constitute the highest proportion within the project budgets. We follow the sustainability performances of our subcontractors in these projects, where lower subcontractors are used compared to our other projects.

In our Performance Evaluation section; in the table that indicates the ratio of supplier expenses within the project budgets, the suppliers that are in the highest proportion in the total budget for each project are included in the second party audit plans and their sustainability performances are reviewed.



WORKING AT NUROL CONSTRUCTION

Human Resources
Employee Training and Development
Subcontractor Employee Management

WORKING AT NUROL CONSTRUCTION

Our relationship based on mutual trust, respect for human values, love, justice, loyalty and sharing is an integral part of our culture with the awareness of the idea that “employees determine the future of institutions”. As a result of the value we attach to employee loyalty, our staff turnover rates are very low compared to the sector average.

It is one of our primary targets to gain high quality labor force with high environmental and social sensitivity, humane and professional development to our company and society.



ALTHOUGH NUROL GROUP PROVIDES SERVICES IN DIFFERENT COUNTRIES AND DIFFERENT SECTORS, OUR GROUP COMPANIES’ HUMAN RESOURCES POLICY AND HUMAN PERSPECTIVE ARE COMMON.

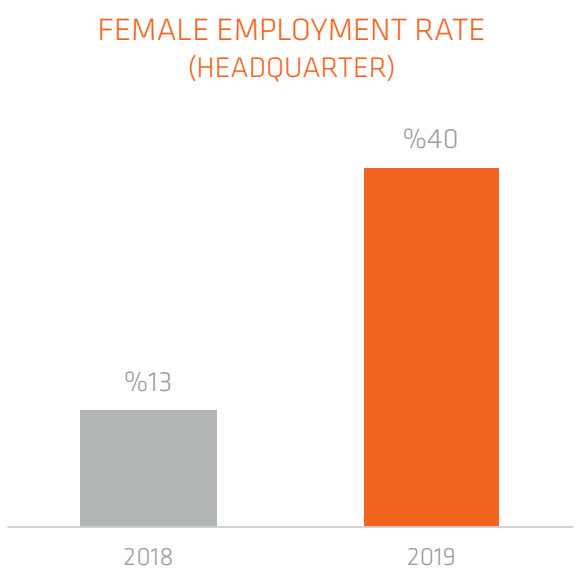
HUMAN RESOURCES

Human factor is the golden key to success especially for our construction industry. Providing the reflection of our know-how and efficient asset utilization to our actions and behavior is one of the most important goals of our company. We believe putting people at our core differentiates us to generate sustainable competitive advantage and create difference in our activities.

As Nurol Construction, we follow the ever-changing personnel management approach on a global scale with the Human Resources Department that we restructured in 2019. The happiness and motivation of our employees are the building blocks of our success. We believe that our organization, which has made serious progress in becoming a magnet company, will also achieve great success in terms of human resources. We adopt a high trust culture and we are endeavoring to achieve this culture.

With our new structure, we held meetings with our department managers in order to strengthen communication in our company and made preliminary meetings for the development of our teams. In the light of these interviews and other works we have made, we have set our goals for the practices we will develop for our employees. Among these, there is also the goal of establishing a performance management system through Human Resources, which is structured. Instead of identifying the shortcomings, we will prepare new personal development plans within the framework of organizational equity, with a performance evaluation that will enable us to see the strengths and weaknesses of our colleagues.

We make choices considering all the criteria we mentioned in our recruitment processes, and add people who are open to development and who can match the corporate culture to our family. In 2019, we took various steps on gender equality and declared our intention to include women more in business life. While 13% of our personnel recruited in our headquarter in 2018 are women, 40% of the people we employ in 2019 are women.



Creating equal opportunities for every Nurol Construction employee can be achieved by regarding our employees at all levels as honorable and respected individuals. Every employee under Nurol's guarantee is evaluated on the basis of personal qualities, experience, discipline and work efficiency, regardless of race, national origin, religious belief, age, physical disability, gender or sexual orientation, in accordance with the laws we are subject to. Alongside all these evaluations, the rights and obligations of our employees and working conditions are described in our “Personnel Regulation”, promotions, compensation, benefits, rewarding, working conditions, permits, social benefits are applied within the scope of the regulation. We do not consider gender as a criterion in wage determinations, and we make evaluations depending on the success and development of the employee regardless of gender. Apart from the remuneration that our employees receive in return, we provide our employees with various corporate benefits to increase their financial motivation. With each passing day, improving the benefits we provide to our employees proves that we have the right management approach. We have stated with our "Code of Governance" that it is a responsibility for our employees to inform the relevant people and managers if it is observed or suspected that an application contrary to all these regulations and policies is being made. During the employment process, the contracts are determined by the relevant labor law and mutual agreement with the employee is ensured. Personnel rights are carefully maintained and protected. In line with the skills and positions of our employees whose duties have ended in our projects, we demonstrate great sensitivity in transferring these skills and experiences to new or existing suitable project, and we strive to create opportunities for our employees who have made great efforts to our family for many years to be employed in other areas.

All of our employees have maternity leave and pension rights provided by legal requirements, but they also have various benefits. Depending on the location, different applications can be carried out for our personnel working in our headquarters and projects. We provide two salary bonuses annually in order to provide financial motivation to all our employees working in our headquarters and projects. Advance requests of our personnel are also met based on the seniority year and net salary. Private health insurance and private pension insurance (PPS) are among the opportunities provided for our employees upon request. We give a meal card to our center employees and load the the designated amount on the cards monthly. We provide shuttle service for transportation, plus we allocate monthly travel fees for our non-service personnel. We offer parking facilities for our personnel using vehicles. We provide vehicle and telephone opportunities to our senior managers. We have twice a year clothing support for our service employees, drivers and security personnel working in our General Directorate, in summer and winter.

We endeavour to provide the most suitable camp conditions for the accommodation of our staff in the projects. At the same time, we carry out improvement works in our camp sites in line with the demands and complaints of our employees during the project period.



In all our projects, we have a cafeteria service that our employees can use in the morning, lunch and evening. At the same time, social spaces are arranged for our employees in our projects. Within the social spaces on camp sites of our projects; depending on the conditions, there are indoor or outdoor sports areas, game consoles, book reading rooms, television and free sports broadcasting services, and wireless internet is provided continuously. Gift baskets are prepared for our employees in some of our projects during holidays and new years.

With our new Human Resources structure in 2019, various corporate applications have been developed for our employees. One of our new applications was to give gold to our new born employees as a gift for their newly births, and our personnel who have babies were included in this program. Award-winning game tournaments and dining events are also among our new practices to increase the team spirit among our employees. New year gifts, birthday and other special day gift gestures are made to increase employee loyalty and moral motivation. Some of the said gift preparations are provided by coordinating with the related foundations and associations within the scope of social responsibility. We aim to send a message to our employees about how sensitive we are to social responsibility and that everyone in our family should be sensitive. In parallel with this, we will continue to organize conversations, lunch, tournaments, competitions, workshops and seminars that increase organizational commitment, improve performance, improve corporate communication ability. In 2020, all these activities will continue in line with the opinions of the employees.



Detailed tables about our employees shared in the Performance Assessment section of the report.

In 2020, we are planning to open the “Nurol Construction Training and Event Area” where our headquarter employees can spend free time and we can organize our trainings. In addition to establishing spaces for game consoles, reading and resting rooms, meeting rooms, and television areas for our employees in these spaces, we aim to provide all facilities necessary for training.

For effective employee representation; Nurol Construction appoints sufficient number of employee representatives as specified in the legislation by appointment in case it cannot be determined by selection, considering the operational and departmental risks and balanced distribution in projects and HQ. Employee representatives are announced to all employees by notice boards and e-mail. Employee representatives are responsible from conveying the opinions, complaints or suggestions about occupational health and safety and environment of all employees in OHS-E Meetings or sharing with Occupational Health and Safety Department. Employee representative is also responsible from informing the related employee on any hazardous situation on the site. In our overseas

projects, this practice is also in place even there is no legal requirement. Within the scope of our Nurol Construction Family Talks organizations, which are held at least four times a year, employees are represented through voluntary participating staff as well.

No formal or informal agreement with any union for Balikesir Motorway Project, Konya Eyiste Viaduct Project and Souk Tleta Dam Project while some of our employees are union members in Boukhroufa Dam Project.

As stated clearly in our company policy, we do not employ nor allow child labor. Since we do not employ child labor, no incidents were encountered. There was no case of forced or compulsory labor in our HQ or in our projects.

Nurol Construction is committed not to employ any personnel in violation of the Labor Law by policies and values. In order to comply with the legislation and prevent child labor, all employee records of our subcontractors and suppliers are taken and checked for compliance. This compliance is confirmed by frequent field checks.



EMPLOYEE TRAINING AND DEVELOPMENT

In our company, we set long-term goals for our employees and approach everyone with an objective and equal opportunity approach, and create training opportunities to contribute to their development. By strengthening the communication between our teams, we strengthen their development by enabling our employees to share their knowledge and different perspectives.

We make training needs analysis to increase the competencies of our employees and we prepare training plans for the next year. In line with the training needs analysis, new training and development plans are made and interviewed with specialized training institutions. In addition, discussions are held about department managers and their

teams, and opinions are received for their training and development. In 2019, various training and vocational trainings on quality, environment, occupational health and safety, human resources, sustainability, healthy life, social skills, digitization have been organized in our centers and projects.

Our personnel, who are newly employed in the headquarter, are given an orientation training by the Human Resources Department, and they are informed about the legal rights they deserve and the corporate practices of our company. After the Human Resources Department training, OHS orientation training, environmental awareness and waste management training, IMS orientation training

and QDMS information training if applicable are given. In our projects, we provide project orientation training for at least 2 hours, including our subcontractor staff who are hired after the job briefing given by the Financial and Administrative Affairs Departments. Nurol Construction OHS-E department employees share the following topics within the scope of training; project sections and works to be done, camp sites, emergency meeting places and emergency location plans, legal rights and responsibilities, internal guidelines, occupational health and safety general rules, compulsory personal protective gear to be used on site and work-specific risks on sites.

For the SAP program that we migrated in 2019, we have provided our headquarter personnel to receive relevant training throughout the year. This year when our focus on digitalization got further stronger, we have been able to increase the competencies of our personnel in this regard. At the same time, we organized trainings in the centers and projects on the use of the QDMS management system we currently use, thus increasing the number of QDMS users.

For this year's other prioritized themes, environmental and sustainability issues, we organized trainings that will raise the awareness of all our managers on environmental social standards demanded by international credit institutions. In sustainability reporting processes, we received external training to increase the competence of our teams.

We focused on emergency management on Occupational Health and Safety, and increased the number of first-aid personnel in our headquarter by completing their training. We renewed the training of our emergency teams, received their opinions and suggestions on

BALIKESIR MOTORWAY PROJECT

We are planning and implementing trainings in the project in order to increase employee skills. In case needed, we participate in the trainings organized by Nurol Construction Headquarter and organize trainings according to the needs of the departments. Certificate programs are also organized to raise the talents of the employees according to their duties in the project.

Trainings have been organized for our project subcontractor and related staff of Nurol Construction administrative affairs on security practices in accordance with human rights and ethical rules.

emergency management and included them in the planning process. We organized “First Aid Awareness Training” for our driver personnel to respond in emergency situations. At the same time, we continued to provide safe driving training to our new drivers this year.

Human Resources Department with the organization "Communication is everything" in line with opinion "Communication 5 Keys" training was carried out, training was conducted through one of Turkey's leading educational institutions. This training, which consists of abundant dialogue and sketches, was impressive on the employee's view of training. It was a very beneficial training with extensive positive feedbacks.

Although it is one of the titles of the Global Compact that we are signatory of, the issue of Human Rights is one of the important issues that our company emphasizes within the scope of code of governance. For this reason, training activities on human rights were carried out in our four projects included in the report in 2019. While the participation of the security company personnel and administrative affairs personnel working in our projects was ensured in the training activities, they were asked to give training on Human Rights to their employees by discussing with the companies we received security services from.

In 2020, we plan to provide training for wide range of professional and social skills in line with the demands of the employees. We have generally touched on the training activities in our projects. We would like to inform you about the trainings that take place in our projects specific to the project as follows.

Our Code of Governance Manual project was distributed to the personnel by the Personnel Affairs Department and recorded. Deliveries were also continued on staff recruitment. The established code of governance are also organized in the project, under the coordination of the project director and administrative-financial affairs manager, with the participation of blue-collar and white-collar personnel, family talks are organized and the rules of governance are handled with the consultation and participation of the personnel.

The general training topics given to the employees in 2019 in our project are as follows.

- Trainings on Hazards and Risks Arising from Project Activities
- Trainings to Reduce Environmental Impacts from Project Activities
- Nurol Construction Headquarter Procedures and Instructions Trainings
- Sustainability Training
- Legal Liabilities Training Resulted from Work Accidents
- QDMS Accident Modules Training
- Training on Addressing Critical Issues in Contracts
- Ways to Motivate People
- QDMS Accident Modules Training
- Process Risk and Opportunity Training
- OHS Training
- Security Practices in Compliance with Human Rights and Ethical Rules

KONYA EYISTE VIADUCT PROJECT

In addition to the legal trainings required given to our personnel in our project, we ensure that trainings that can improve themselves professionally and that raise awareness about occupational health and safety and the environment are organized. In most cases, by including our subcontractors in these trainings, we support them in training.

Although we prefer to have outsourced trainings for high-risk jobs due to our activities, we have developed practice areas in our camp site to provide these trainings with practice. We increased our hands-on training before and after the exercise, by considering emergency management both in the environment and in terms of OHS.

In 2019, it was ensured that administrative affairs personnel were trained on human rights and they were made aware of this issue. At family talks meetings, the code of governance are reminded to the personnel, manuals are distributed to all personnel in return for signature, and new personnel are informed and manuals are delivered.

In 2019, our employees were trained by the competent staff of our Technical Office and Quality Control Departments on contract requirements, repair practices in concrete structures, effective communication, vibration applications in concrete manufacturing, causes and measures of segregation. Compared to 2018, there is an increase in the quality trainings given in our project, and quality trainings in different subjects are also included in the 2020 training plan.

For "Working at Height", which we consider as the most important risky work in our project, we have provided 266 hours of human training to our employees in our training application areas. If we organize high in the year, the amount of training is 352 people. During this year, we increased our environmental education rate by 37.2% by focusing on waste management, environmental practice and basic environmental awareness training.

BOUKHROUFA DAM PROJECT

At the beginning of each year, training calendar is prepared and trainings in line with this plan are scheduled throughout the year. Additional training is obtained during the year according to the needs or opportunities.

Since they are at risk of working at height in 2019, our employees working in the water intake tower were provided with working at height trainings. Lifting equipment operators trainings were organized by a private company outsourced, and this training enabled to increase the professional competence of the operators.

In our project, we emphasize on special trainings of our employees who are at risk, therefore we focus on our risk-oriented trainings. We increased our tool-box training rates on site, especially before starting work, and enabled our staff to work more aware of the risks they face. In 2019, our personnel working in the relevant departments were trained on water retention preparations and issues to be considered,



fuse gate system and construction method, 2019 budget and points to be considered by the skilled process leaders of our project. Externally, we have provided our employees with training on open pit business legislation, labor law and practices in Algeria by our legal authorities. Personnel payroll computer program training is an outsourced training for our Personnel Affairs Department.

By providing sustainability training to our employees in 2019, the Headquarter Integrated Management Systems contributed to the development of the employee perspective in this direction.

During the year, four family meetings were held with the employees and the information about Nurol's code of governance was reminded in the meetings. At the same time, our administrative affairs and security personnel are included in human rights trainings, the trainings are planned to be repeated every year.

SOUK TLETA DAM PROJECT

In 2019, we ensured that our personnel received trainings on the following topics in our project.

- Risks and Hazards in Our Project
- Risks and Hazards in the Kitchen
- Risks and Hazards in Office and Campgrounds
- Risks and Dangers About Guard Service
- Working in the Indoor Area
- Working at Height and Using Personal Protective Equipment
- Organization of Cables and Use of Power Tools, Electric Risks and Hazards
- Training on Chemicals, Stocking Conditions and Usage Method, Hazard and Risk Assessment
- Concentration/Lifting Works/Material Drop Hazard in the Workplace
- General Information Training for Cleaning and Service Staff
- Concrete Plant and Laboratory Staff Information Training
- Human Rights Training (Security and administrative affairs staff)
- General Information Training in DP1 and DP2 Tunnels
- Toolbox Trainings (On-the-Job Trainings)

In all meetings held within the scope of our project, especially the effects of mutual good communication and respect in the peaceful and positive work of the business are explained, and information is provided regarding the Nurol Code of Governance. Our local employees are also informed about the Nurol Code of Governance.

SUBCONTRACTOR
EMPLOYEE MANAGEMENT

Audit of the employee rights of subcontractors at our construction sites are conducted by the relevant project management. We are very careful about not employing uninsured personnel in all of our projects. We carry out our checks by making regular visits to the working areas of subcontractors. In the "Value Chain Management" section, we mentioned our controls regarding subcontractors, and we also dealt with employee management issues extensively.

In accordance with the obligations arising from the Law No. 4857 at our projects in Turkey, Personnel Affairs Departments verify whether the rights and receivables of the sub-contractor personnel are paid in full. Employee rights are guaranteed in the contracts with subcontractors. Also; subcontractor employees may also notify us in case of any setbacks and these notifications shall be evaluated. In case of merit, the related grievance is remedied.

Subcontractors in our international projects are not obliged to take social insurance number for employees as in Turkey, but sub-contractor staff monitored for the tracking of the issue on a monthly basis. In our project, no negative cases were encountered in 2019 regarding these issues.





OUR CONTRIBUTION TO SOCIETY

Contribution to Local Community and Economy
Social Responsibility Actions
Nurol Education, Culture and Sports Foundation
Nurol Art Gallery

OUR CONTRIBUTION TO SOCIETY

As an organization, we care about interaction with local communities living in the locations where we operate. While we try to contribute to the economies of priority local communities, we also strengthen the interaction between us by increasing the platform of dialogue. We see it as a corporate responsibility to respond to the demands of the local community by contributing not only to the structures we have built but also to the employment we create, strengthening the local economy, meeting the needs of the region, and supporting the education and development of the people. For this reason, we take care to establish an effective, open and bilateral communication with our local community in our projects, and we create specific suggestion/complaint mechanisms for the region in order to determine their needs and expectations.

CONTRIBUTION TO LOCAL COMMUNITY AND ECONOMY

We prefer local suppliers in the region where we operate, and we take care to contribute to the economy of the region. For this reason, we make our purchases from our local suppliers in conditions permitted. In our Balıkesir Motorway Project, the expenditure on local suppliers among all suppliers in 2019 was 11,6%, and compared to last year, we see that we have significantly increased our working rate with our local suppliers. In Konya Eyiste Viaduct Project, the ratio we allocate to our local suppliers is 10%. Since the beginning of the project,

BALIKESIR MOTORWAY PROJECT

We care to ensure that the communication we have with our project stakeholders is strong, and in this direction, we try to create structures that will ensure diversity of stakeholders in our processes and decision-making mechanisms. Since the initial phase of the project, the local community has addressed complaints and requests to related department managers, project managers and administrative department manager through face-to-face meetings with local people, local authorities, on-site visits and official correspondences. Starting with the emergence of a cause of complaint, until the cause of the complaint disappears, we do not interrupt our communication with the local people and neighboring businesses, but also prevent the grievances that may occur by working focused on receiving and resolving the existing requests before the complaint occurs. Direct requests and complaints from related parties can also be delivered to our Project Directorate by local community stakeholders. During the trainings given by the HQ Integrated Management Systems Department, project specific samples are also given while informing about the methodology. This communication continues bilaterally until This communication

We believe that social responsibility areas should be expanded in proportion to the size of the institutions. With its 55-year history and successful projects in the sector, Nurol Construction approaches the issue of contributing to society with this perspective. We also try to develop the concept of corporate volunteering by supporting our employees to take part in volunteer work. We observe that the employees established in volunteer work have also developed ties with the institution. While our social responsibility activities include groups such as disadvantaged children and sick children, we are also involved in corporate social responsibility works regarding the areas we have an impact on. In the coming years, we plan to develop joint social responsibility works with local communities in the areas where we have an impact and in the regions where we do business.

ready-mixed concrete supply, which has an important place in production costs, is provided by a company established in the region. While our local supplier rate in the Boukhroufa Dam Project, which is one of our overseas projects, is 77,75%, this rate is 69,4% in our Souk Tleta Project. In our Boukhroufa Dam Project, we have increased our local supplier rate compared to last year.

We explain in detail the contributions we provide directly and indirectly to local communities together with the practices we make.

continues bilaterally until mutual agreement is reached regarding the grievances or claims of the local residents. After the works about the citizen's claims and complaints reported by the employer have been concluded by the relevant project departments, the feedback is made through official correspondence. The environment, occupational health and safety, and social risks arising from our activities are reviewed and discussed at the OHS Boards and coordination meetings held monthly with our company and subcontractors, and also at monthly meetings with the subcontractor Employers/Employer representatives.

In addition to face-to-face meetings and dialogues with our stakeholders, our subcontractors and suppliers that have direct impact on our project, meetings and official correspondences are conducted with all parties regarding the planning of their activities, specifications and progress payments.

The works such as earthworks, road transfer works, construction equipment transitions performed in accordance with the activities of our project caused the following problems in the environment.

These problems were resolved in a timely manner by being in touch with the parties and with our solution-oriented approaches. With the opening of the motorway, solutions were provided in line with the demands and agreements of the parties, and actions were completed in accordance with environmental and social laws in the delivery of the land and the lands in use. In addition, support was provided to neighboring villages and neighborhoods on the following issues during the project.

In October 2019, a blood donation organization was conducted with the cooperation of our Balıkesir Motorway Project, Occupational Health and Safety Department and the Red Crescent. Our staff donated blood with the Red Crescent blood donation mobile tool. 54 of the project personnel participated in donating blood by filling out forms, and 28 people who were in compliance with the standards of the Turkish Red Crescent did donate blood.

KONYA EYISTE VIADUCT PROJECT

In order to support local communities, we evaluate the complaints and requests of our neighborhoods and villages within the boundaries of our project, and create solutions for every issue we can support. We have created local public employment in our project and we also contribute to the local economy with the local suppliers we have chosen. We try to meet the expectations of our stakeholders through environmental trips, oral dialogues and local community visits. We

BOUKHROUFA DAM PROJECT

Our project, which is located in the city of El Tarf in the northeastern of Algeria, is expected to contribute to the country both locally and nationally. The project is considered to be an important investment in the development of the less developed region compared to other regions. Considering that the project is a dam construction, it is anticipated that it will prevent floods caused by heavy rainfall in the winter, creating another advantage. The dam construction will be a source of water in the operation of phosphate mines in the region, and will contribute greatly to the economy of Algeria.

We prefer local suppliers to support the economy in the region where the project is located, at the same time we ensure that local staff are employed in the project. We allow the employees we employ to receive certificates for their professional competence during and at the end of training. 90% of our employees are made up of local people. About 60 of the 300 local employees working in 2019 live in

- Support was provided for the reinforced concrete of the fountains, ablution points and tile workmanship and cleaning of the carpets to the mosque of Ertuğrul Village.
- The sports areas on the construction site have been allowed to be used in certain periods by the youth and children living in the surrounding villages.
- During the establishment of the cultural area in the village of Kuyualan, tea shop materials and equipment, cleaning materials were provided and paving stones were made in the area.
- Local people residing in the surrounding settlements were invited to the dinner during Ramadan and other social events.
- For local law enforcement facilities; security cabin, table, chair, air conditioner, stationery and cleaning material and concrete barriers were supplied by us.

also create a space for our local employees to convey their demands and complaints to us through the Nurol Construction Family Talks Organizations we have made.

The acquisition of idle land owned by the residents of the project region by rental and expropriation method has created a source of income for the public, and the positive effects of our activities have been reflected to the society in this way.

the village near the project and 90 live in the district to which the project is connected. At the same time, in addition to the rights granted by Algerian laws, our local personnel are entitled to a base salary compensation annually. 90% of the fuel requirement of the vehicles in the project is supplied from the oil stations of the district to which it is connected, and the need for bread is met from the district to which we are connected.

Complaints received from the local community reach directly to the Project Management office verbally and in writing. Our project management is in constant communication with nearby villages and districts. All local people and employees can make their complaints and requests to the management office individually and necessary actions are taken by evaluating the complaints and requests in a short time. Some support programs made throughout the project are listed below.

- The vehicles of the project driving through the settlements have caused issues affecting the daily life such as noise and dust to the environment.
- With the commencement of road transfer construction and wire fence manufacturing, the passage of animals and people to agricultural lands was restricted.
- While vehicles are driving through the surrounding settlements, it has caused problems such as injuries to the animals owned by the neighbor community occurred.
- Disruptions and disagreements have occurred in the restoration of the citizens' land used as subcontractor camps.

- Roads have been constructed or renewed as needed in the region.
- Water supply was provided to regions with water shortages. Drinking water is transported to a village that does not have any water near the project on a regular basis.
- In addition to the roads around the project, periodic maintenance was carried out on the district roads.
- 1.000 m³ filling material was given for the football field built by Bouteldja district municipality.
- A construction machine was provided for the mosque construction of the village near the project, 100 m³ filling material, 300 kg rebar and 15 m³ were provided.

SOUK TLETA DAM PROJECT

Within the scope of stakeholder engagement activities, the demands and complaints of the local people are received verbally, and the demands of the Employer are met through verbal and written notifications to the Project Directorate. Following activities have been carried out in the region with requests from the employer.

- Areas damaged by natural disasters are repaired.
- Local personnel are employed from the region.
- We provide professional and specialist trainings to contribute to the development of the employees,.
- Local suppliers are preferred.

SOCIAL RESPONSIBILITY ACTIONS

NEW YEAR'S GIFTS IN 2019

ÇEKÜL FOUNDATION

As Nuro Construction, we cooperate with the Çekül Foundation, which aims to protect the natural, historical and cultural assets of our country, has produced extensive projects and programs based on the vital harmony between nature, culture and people, and we strengthen our relations with the foundation to contribute to the protection of natural and cultural heritage. In this context, we provided support for the projects by purchasing the 2019 Christmas gifts from the Çekül Foundation this year. This support has created awareness among our employees.

2019 BIRTHDAY GIFTS

HOPE FOUNDATION FOR CHILDREN WITH CANCER

Nuro Construction is cooperating with Hope Foundation for Children with Cancer and supporting the treatment process of Children with cancer through various projects since 2016. The Hope Foundation for Children with Cancer ensures the continuity of the treatment of children at risk of disrupting treatment due to financial problems, providing psychological support and treatment environment appropriate to child psychology, which is an important requirement during the fight against cancer.

As Nuro Construction, we selected birthday gifts from KAÇUV for being a hope for children with cancer in 2019. In this way, we continue our traditional cooperation with the Hope Foundation for Children with Cancer.



8 MARCH INTERNATIONAL WOMEN'S DAY GIFTS

PAYDA NGO

On March 8, 2019, International Women's Day, we selected gifts from the Paylaşma ve Dayanışma Platformu Derneği (Payda) for our women working in our Nuro Construction headquarters and construction sites. It is the products of the Oya Project, which is carried out in order to evaluate the handicraft of women who produce gifts and who want to participate in production and to strengthen production. Thanks to our cooperation with the Payda, we have supported the project as Nuro Construction. With our support to this project, we contributed to the production of more women with solidarity and active participation in social life.

The mission of the Payda NGO, which was established in 2009, is expressed as "Development through social interaction". In its common denominator projects, besides providing scholarships to the education of girls, Payda assigns a volunteer to each student for mentoring and sharing throughout her education life. It aims to bridge the gap by bringing together different communities with its projects supporting women's initiative movements.

APRIL 23, BOOK DONATION CAMPAIGN FOR CHILDREN

PAYDA NGO

Our collaboration with Payda started in 2019 with the aim of supporting girls' education. In this context, we donated books to girls in Batman under the responsibility of the NGO's volunteers on April 23, within the scope of the Platform's "Payda with Students". Thanks to this project, volunteers assigned to the girls both provide financial support to girls' education and guide children in education and training. As Nuro Construction, we shared the joys of children in their April 23 meeting at Batman.



23 APRIL VILLAGE SCHOOLS AID PROJECT

YILDIZ TECHNICAL UNIVERSITY

Our company, which is in constant communication with the University Communities, provided material assistance for the renovation of a primary school in Sakarya this year and supported the children's education, as a sponsor of the Yıldız Technical University Development and Innovation Community's 23 April Village Schools Project. At the same time, with this and other similar projects, we both strengthen our relations with universities and aim to be guides for new university students being a strong company.



ANNOUNCEMENT OF "LAW ON COMBATING VIOLENCE AGAINST WOMEN LAW GUIDE" TO WOMEN EMPLOYEES KIZ BAŞINA NON-GOVERNMENTAL ORGANIZATION

"Kız Başına", is a nongovernmental organization studying violence and harassment against women and children in Turkey. The "Legal Guide for Combating Violence Against Women" prepared by NGO setting out the legal information for effectively combat violence against women was shared with our female employees. We aim for our employees to gain awareness about current concepts in violence against women, the status of law in violence against women, methods of nonviolent communication, and the development process of civil law.

SHARING THE GENDER EQUALITY QUESTIONNAIRE WITH EMPLOYEES YANINDAYIZ ASSOCIATION (WE ARE WITH YOU)

In order to raise awareness about gender equality, the Gender Equality Questionnaire of the "Yanıdayız Association" was shared with our employees. Our employees made a self-assessment on this issue and their awareness on this issue has increased. We are with You Association is a non-governmental organization founded by businessmen whose purpose is to achieve gender equality.

BREAST CANCER AWARENESS SEMINAR MEMORIAL (BREAST CANCER AWARENESS MONTH)

In October, the Breast Cancer Awareness Month, Nurol Construction Human Resources Department organized a Breast Cancer Awareness Seminar for women employees and the seminar was held by a specialist doctor from Memorial Hospital. In a lottery held at the end of the seminar, 3 employees were provided with a cancer control package including breast cancer examination and examination procedures.



ORANGE THE WORLD CAMPAIGN (25 NOVEMBER - 10 DECEMBER)

The “16 Day Activism in Combating Gender Based Violence” campaign, which is held internationally every year, began on 25 November 2019, the International Day of Combating Violence Against Women until the Human Rights Day on 10 December 2019.

The “UNITE to End Violence Against Women” campaign, which aims to raise global awareness, strengthen advocacy efforts and share information and innovations and call for global activism, is held every year under the leadership of the Secretary-General of the United Nations.

Nurol Construction participated in the campaign this year by lighting exterior of the Nurol Plaza building and the Nurol Life building pyramid in orange during the campaign, and by raising awareness about combating gender-based violence by informing the employees and supporting the participation of the employees in the campaign via social media.

SHARING CORPORATE COMPLIANCE AND ETHICS WEEK WITH EMPLOYEES MAGAZINE SHARING

Corporate Compliance and Ethics Week, celebrated in November in order to increase awareness of business ethics and compliance issues "Ethics and Reputation Society of Turkey" was shared with the publication Inmagazine personnel. In this context, by celebrating the Corporate Ethics and Compliance Week, the importance of Nurol Construction's being the cornerstone of the corporate culture was reminded to the employees, and we had the opportunity to emphasize that the works on ethics continue.



NUROL EDUCATION, CULTURE AND SPORTS FOUNDATION

Nurol Education, Culture and Sports Foundation was founded by ÇARMIKLI Family in 1996 to promote and develop our national culture by preserving its ties with the past, to contribute to the efforts of our country to reach the level of modern civilization and to take the place it deserves internationally.

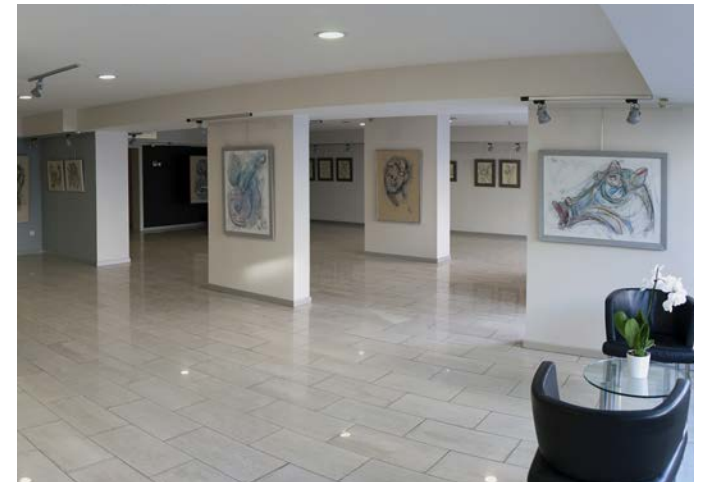
Nurol Foundation continues its activities utilizing the return-on-assets in Nurol's portfolio and the financial support provided from the Group Companies annually. In the light of the principles and values, Nurol values activities aiming to improve the quality of society life and maintains its tradition of supporting contemporary education, sports, culture and art in order to create better future.

The foundation, donated libraries, sports, educational and congress halls, cinema, theater together with building facilities and landscaping in various regions of Turkey under the scope of educational support activities and the Foundation continues offering its service to our country today too.



NUROL ART GALLERY

Nurol Art Gallery was opened in 2002 in Kavaklıdere Ankara for art enthusiasts. The gallery organizes eight to nine exhibitions in each art season, as well as talks, autograph sessions and promotion days. Our gallery provides a comprehensive catalog for each exhibition and prepares a permanent document for both our gallery and the artist. In addition to the catalogs, we made various art publications to contribute to our culture. After exhibiting the works in the gallery, they are transferred to our Art Gallery in Bodrum OASIS.





PERFORMANCE ASSESSMENT

Sustainability Goals

Performance Indicators Details

SUSTAINABILITY GOALS

OUR 2019 TARGET ACHIEVEMENT

Goal Issue	2019 Goals	Achievement Status
Sustainability Management	Establishing Sustainability Committee via inclusion of Board of Directors and senior management.	The Sustainability Committee was established in 2019 and the "Sustainability Committee Implementation Guide", which defines its structure and responsibilities, has been published.
Management Systems	Determining and obtaining new certifications in line with the needs and expectations of the relevant parties (employers, legal authorities, etc.) in the new markets where we are developing business.	A process has been initiated for the acquisition of OSHAD Certificate at the request of the relevant parties in the areas where we are developing business, and OSHAD competencies in quality, OHS and environment have been provided.
	Increasing the number of modules used in the Document Software System (QDMS).	In 2019, works were carried out with Personal Protective Equipment Inventory and Embezzlement Management, On-the-Job and Periodic Audit, Legal Legislation Compliance Management and Material Safety Data Sheet modules.
Code of Governance	Sharing Code of Governance for all projects through Nurol Construction Family Talks Organizations and increase awareness on the issue.	At Nurol Construction Family Talks Organizations held in all our projects, our employees were informed about the Code of Governance and their awareness was increased.
Stakeholder Engagement	Arranging Nurol Construction Family Talks Organization for all projects for min 4 times yearly.	Our target was achieved by organizing 4 meetings annually in our Balikesir Motorway Project, Konya Eyiste Viaduct Project and Boukhroufa Dam Project.
Environmental Management	Meeting with sub-contractors on environmental issues quarterly.	Our target was achieved by organizing 4 meetings annually in our Balikesir Motorway Project, Konya Eyiste Viaduct Project and Boukhroufa Dam Project.
	Releasing "Improvement Report" on OHS-E issues for improvement in HQ and projects.	Improvement efforts were made for waste battery management in our Balikesir Motorway Project with the "Bring Old Battery, Take New" project, using water accumulating in front of the cofferdam to reduce groundwater consumption and fuel consumption in our Boukhorufa Dam Project and with the water fountain to reduce plastic waste in the headquarter office.
	Carrying biodiversity works in all project sites, project planning for the protection of biodiversity.	Awareness raising activities on these areas have been conducted in all of our projects.
	Carrying out species protection works in all project sites, project planning for the protection of species.	Awareness raising activities on these areas have been conducted in all of our projects.
OHS Management	Publish and distribute 'OHS-E Handbook' to all employees to raise the awareness and competence of all working for the projects.	Our "OHS-E Handbook" has been completed, in which the basic requirements of occupational health and safety and the environment are transferred.

Goal Issue	2019 Goals	Achievement Status
OHS-E Trainings	100 min./month Per person training for HQ employees on Quality, Environment and OHS topics.	The target has been achieved by providing 158 minutes/month of training to our headquarter staff on quality, environment and OHS.
OHS Trainings	45 min/month training for Nurol Construction employees.	There is 48% achievement rate in our trainings with our Balikesir Motorway Project is 124,42 min/month, Konya Eyiste Viaduct Project is 45,8 min/month, and our Boukhroufa Dam Project is 47,87 min/month, while the Souk Tleta Dam Project is 21,8 min/month.
OHS Operational Controls	Yearly 12 occupational safety site visits together with Project Management	Our goal was achieved in all of our projects by performing 12 field tours in our Balikesir Motorway Project 12, Konya Eyiste Viaduct Project 16, Boukhroufa Dam Project 12, Souk Tleta Dam Project.
Occupational Accidents	Accident Weight Ratio below 1.8 Accident Weight Ratio = Total Working Day Loss * 10 ³ /Total Working Hours	Our Konya Eyiste Viaduct Project has 0, Boukhroufa Dam Project has 0,152 and Souk Tleta Dam Project has an accident rate of 0,381, by which the targets are realized. With the 2,894 accident weight ratio in our Balikesir Motorway Project, it has been behind the target.
	Accident Frequency Rate below 18 (Accident Frequency Rate = Total Number of Accidents with Lost Day/Total Working Hours x 10 ⁶)	Our Balikesir Motorway Project was achieved with 1,916, Konya Eyiste Viaduct Project 0, Boukhroufa Dam Project 14,374, and Souk Tleta Dam Project, with a target rate of 12,511.
Emergency Management	Minimum 3 emergency drills during the year.	Our target was achieved by conducting 3 exercises during the year in our Balikesir Motorway Project, Konya Eyiste Viaduct Project and Boukhroufa Dam Project.
Value Chain Management	Carry out a second party audit (supplier and subcontractor) at least once a month to monitor OHS, Environment and Quality issues.	With the aim of conducting a second party inspection at least once a month in our Balikesir Motorway Project, 13 suppliers and subcontractors were audited in 2019 and the target was achieved.

In the Souk Tleta Dam Project, meetings were held with the employees in consultation in 2019. We could not accept the target program due to the fact that it was not in the format of Nurol Construction Family Talks organization. In our project, which could not achieve the goal of 3 emergency drills in 2019, we devised plans for 2020. Although environmental issues were addressed at meetings held with subcontractors, they could not be regarded as achieving the goal because no records were kept, but they got their notes on recording more of their work for 2020. We expect them to carry out an improvement project on the environment in 2020.

In the Konya Eyiste Viaduct Project, the subject of making an environmental improvement project in the 2019 target program was not available and we included it in the 2020 plans. Our project, which shows 50% success in family talks organizations, has been projected to complete its organizations for 2020.

Our Balikesir Motorway Project was generally successful in its environmental and social objectives in 2019. One of the important targets, the accident rate was realized as 2,89 and remained behind its target.

SUSTAINABILITY GOALS

OUR 2020 GOALS

Goal Issue	Goals for 2020
Sustainability Management	Meeting of the Sustainability Committee at least 4 times a year.
	Signing Women's Empowerment Principles (WEPs).
	Organizing training on gender equality.
	Increasing the number of projects within the scope of the Sustainability Reporting report for 2020.
	Preparation and participation in at least one Sustainability Award program.
Management Systems	Organizing at least 3 corporate social responsibility activities annually.
	Starting the works of Survey Management, Suggestion System, Internal Customer Complaint Management Modules by increasing the number of modules used in Document Software System (QDMS).
	Transfer of project incoming and outgoing articles to QDMS on a monthly basis.
	Organizing Internal Auditor Training to expand Nurol Construction Auditor Team.
	Central Process Risk Assessment Team meetings are held quarterly.
Process Management	Go live in the SAP program.
	Nurol Construction processes are reviewed and initiation of improvement works are started.
Stakeholder Engagement	Arranging Nurol Construction Family Talks Organization for all projects for min 4 times yearly.
Environmental Management	Meeting with sub-contractors on environmental issues quarterly.
	Making improvements on environmental issues in the headquarters and projects and publishing them in improvement report format.
	Reducing the amount of waste released in the headquarter by 5%.

Goal Issue	Goals for 2020
OHS Management	Preparation of the OHS-E Toolbox Handbook during the year.
OHS-E Trainings	120 min/month per person training for HQ employees on Quality, Environment, OHS and personal development.
	45 min/month training per person for Nurol Construction employees.
OHS Operational Controls	Yearly 12 occupational safety site visits together with Project Management
Accident Performance	At least 60 hazard notification cards are filled in the project annually
	Notification of at least 36 near miss cards per year in the project
	Accident Weight Ratio below 1,6 Accident Weight Ratio = Total Working Day Loss * 10 ³ /Total Working Hours
	Maintaining accident Frequency Rate below 16 Accident Frequency Rate = Total Number of Accidents with Lost Day/Total Working Hours x 10 ⁶
Emergency Management	Organizing at least 3 emergency drills, 1 of which is Environmental Drills annually.
Value Chain Management	Planning of second party audits (supplier and subcontractor) including OHS, Environment and Quality.
Employee Engagement	Organizing activities in 3-month periods to increase the compliance of the working s taff with the motivation and company working principles.

PERFORMANCE INDICATORS DETAILS

Employees Involved in Standardized OHS Management (The number of employees includes subcontractor employees.)	Number	Ratio in Total
Employees included in the system	876	100%
Those included in the system and audited by the Institution	876	100%
Those included in the system and externally audited	380	43%
Total employee number	876	100%

OHS INDICATORS

BALIKESIR MOTORWAY PROJECT		LOST DAYS AND OCCUPATIONAL ACCIDENTS PERFORMANCE		
Total (Nurol Construction + Subcontractor)	Total Working Hours	2.609.208		
		Female	Male	Total
	Total Number of Accidents	0	22	22
	Number of Accidents with Lost Days	0	4	4
	Number of Fatal Accidents	0	1	1
	Occupational Injury Rate	0	8,43	8,43
	Serious Injury Rate	0	1,53	1,53
	Job Induced Mortality Rate	0	0,38	0,38

KONYA EYISTE VIADUCT PROJECT		LOST DAYS AND OCCUPATIONAL ACCIDENTS PERFORMANCE		
Total (Nurol Construction + Subcontractor)	Total Working Hours	264.276		
		Female	Male	Total
	Total Number of Accidents	0	4	4
	Number of Accidents with Lost Days	0	0	0
	Number of Fatal Accidents	0	0	0
	Occupational Injury Rate	0	15,14	15,14
	Serious Injury Rate	0	0,00	0,00
	Job Induced Mortality Rate	0	0,00	0,00

BOUKHROUFA DAM PROJECT		LOST DAYS AND OCCUPATIONAL ACCIDENTS PERFORMANCE		
Total (Nurol Construction + Subcontractor)	Total Working Hours	834.827		
		Female	Male	Total
	Total Number of Accidents	0	15	15
	Number of Accidents with Lost Days	0	12	12
	Number of Fatal Accidents	0	0	0
	Occupational Injury Rate	0	17,97	17,97
	Serious Injury Rate	0	14,37	14,37
	Job Induced Mortality Rate	0	0	0

SOUK TLETA DAM PROJECT		LOST DAYS AND OCCUPATIONAL ACCIDENTS PERFORMANCE		
Total (Nurol Construction + Subcontractor)	Total Working Hours	719.376		
		Female	Male	Total
	Total Number of Accidents	0	12	12
	Number of Accidents with Lost Days	0	9	9
	Number of Fatal Accidents	0	0	0
	Occupational Injury Rate	0	16,68	16,68
	Serious Injury Rate	0	12,51	12,51
	Job Induced Mortality Rate	0	0	0

BOARD OF DIRECTORS

BOARD OF DIRECTORS AGE BREAKDOWN

< 30	30 - 50	> 50
0	4	4

SENIOR MANAGEMENT AND OTHER EMPLOYEES AGE BREAKDOWN BY GENDER

	Male			Female		
	< 30	30 - 50	> 50	< 30	30 - 50	> 50
Senior Management	0	10	1	0	4	0
Other Employees	4	53	8	3	16	1

OUR EMPLOYEE PROFILE BREAKDOWNS

Figures under 'Employee Profile Breakdown' heading are compiled from the data of 4 projects of Nurol Construction, where employees are directly employed and the projects included in the report.

Project Name	Employee Number				
		White Collar		Blue Collar	
		Female	Male	Female	Male
HQ	Nurol Construction	19	41	5	35
	Subcontractor	0	0	0	0
BKAO Project	Nurol Construction	2	27	0	6
	Subcontractor	2	23	32	92
KHEV Project	Nurol Construction	0	16	0	6
	Subcontractor	0	6	0	68
BBFA Project	Nurol Construction	1	20	0	216
	Subcontractor	0	1	0	37
BST Project	Nurol Construction	0	25	0	140
	Subcontractor	0	2	0	54

Project Title	Subcontractor - Nurol Construction (%)		Blue Collar - White Collar (%)		Only Nurol Construction Employees (%)		All Employees inc. Subcontractors (%)	
	Nurol Construction	Subcontractor	Blue Collar	White Collar	Female	Male	Female	Male
HQ	100%	0%	40%	60%	24%	76%	24%	76%
BKAO Project	19%	81%	71%	29%	6%	94%	20%	80%
KHEV Project	23%	77%	77%	23%	0%	100%	0%	100%
BBFA Project	86%	14%	92%	8%	0,42%	100%	0,36%	100%
BST Project	75%	25%	88%	12%	0%	100%	0%	100%

Project Title	Full-Time		Half-Time	
	Female	Male	Female	Male
HQ	24	75	0	1
BKAO Project	2	33	0	0
KHEV Project	0	22	0	0
BBFA Project	1	236	0	0
BST Project	0	165	0	0

Project Title	Fixed-Term Employment Contract		Permanent Employment Contract	
	Female	Male	Female	Male
HQ	0	0	24	76
BKAO Project	0	0	2	33
KHEV Project	0	0	0	22
BBFA Project	0	0	1	236
BST Project	0	0	0	165

Project Title	Disabled Employee Number (Nurol Construciton Employee)			
	White Collar Employee		Blue Collar Employee	
	Female	Male	Female	Male
HQ	0	0	0	3
BKAO Project	0	0	0	0
KHEV Project	0	0	0	0
BBFA Project	0	0	0	0
BST Project	0	0	0	0

Note: The number of our employees in our projects in Turkey in 2019 due to the ratio of disabled employees under 50 is consistent with the law.

Project Title	Employees, Turkish Citizen				Foreign Nationality Employees			
	Blue Collar		White Collar		Blue Collar		White Collar	
	Female	Male	Female	Male	Female	Male	Female	Male
HQ	5	35	19	41	0	0	0	0
BKAO Project	0	6	2	27	0	0	0	0
KHEV Project	0	6	0	16	0	0	0	0
BBFA Project	0	31	0	13	0	185	1	7
BST Project	0	27	0	11	0	113	0	14

CURRENTLY WORKING STAFF

Project Title	Male						Female					
	< 30 (Age)		30 - 50 (Age)		> 50 (Age)		< 30 (Age)		30 - 50 (Age)		> 50 (Age)	
	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)
HQ	5	5%	59	59%	12	12%	3	3%	21	21%	0	0
BKAO Project	6	17%	14	40%	13	37%	0	0%	2	6%	0	0
KHEV Project	3	13,6%	14	63,6%	5	22,7%	0	0%	0	0%	0	0
BBFA Project	21	9%	168	71%	47	20%	0	0%	1	0,42%	0	0
BST Project	24	15%	123	75%	18	11%	0	0%	0	0%	0	0

PERSONNEL RECRUITED IN THE RELATED PERIOD

Project Title	Male						Female					
	< 30 (Age)		30 - 50 (Age)		> 50 (Age)		< 30 (Age)		30 - 50 (Age)		> 50 (Age)	
	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)
HQ	3	30%	3	30%	0	0%	2	20%	2	20%	0	0%
BKAO Project	0	0%	1	100%	0	0%	0	0%	0	0%	0	0%
KHEV Project	3	27%	8	73%	0	0%	0	0%	0	0%	0	0%
BBFA Project	6	9%	47	70%	13	19%	0	0%	1	1%	0	0%
BST Project	1	11%	8	89%	0	0%	0	0%	0	0%	0	0%

LEAVE OF EMPLOYMENT RATE IN THE RELEVANT PERIOD

Project Title	Male						Female					
	< 30 (Age)		30 - 50 (Age)		> 50 (Age)		< 30 (Age)		30 - 50 (Age)		> 50 (Age)	
	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)
HQ	1	5%	8	40%	5	33%	1	5%	4	67%	1	5%
BKAO Project	27	27%	47	47%	25	33%	1	1%	0	0%	0	0%
KHEV Project	2	25%	4	50%	2	33%	0	0%	0	0%	0	0%
BBFA Project	24	14%	105	61%	41	31%	0	0%	2	1%	1	1%
BST Project	13	12%	68	66%	22	27%	2	2%	0	0%	0	0%

USAGE OF BIRTH LEAVE AND RETENTION RATES AFTER BIRTH LEAVE

	Female	Male
Total Number of Employees Eligible for Parental Leave	1	0
Total Number of Employees Using Parental Leave	1	0
Number of Employees Returning to Work After Parental Leave	1	0
Number of Employees Returned to Work and Continues after 12 Months	1	0
Total Number of Employees Returning from Parental Leave Before Reporting Periods	1	0
Total Number of Employees Needed to Return to Work After Parental Leave (other than those known to be transferred to another job or to be retired)	1	0
Return to Work Rate Among Parental Leaves	100%	-
Retention Rate Between Parental Leaves	100%	-

TRAINING INDICATORS

AVERAGE TRAINING HOURS PER TOTAL EMPLOYEE (HOURS)

	White Collar	Blue Collar	Total
HQ	31,620	2,725	34,344
BKAO Project	16,768	33,862	50,630
KHEV Project	6,759	37,834	44,594
BBFA Project	0,746	18,563	19,309
BST Project	0,147	6,436	6,582
	Female	Male	Total
HQ	11,977	22,367	34,344
BKAO Project	4,480	46,150	50,630
KHEV Project	0,801	43,793	44,594
BBFA Project	0,332	18,977	19,309
BST Project	0,329	6,253	6,582

WASTE MANAGEMENT

WASTE DISPOSED AND RECYCLED

BALIKESIR MOTORWAY PROJECT

	Waste Type	Waste Quantity	Unit
Hazardous Waste	Contaminated Packaging Wastes	3.570	kg
	Oil and Fuel Filter	515	kg
	Other Hydraulic Oils	600	kg
	Vegetable Waste Oil	80	kg
	Electronic Waste	160	kg
Non-Hazardous Waste	Packaging Wastes	3.850	kg
	Waste Type	Waste Quantity	Unit
Disposal	Contaminated Packaging Wastes	3.570	kg
	Oil and Fuel Filter	515	kg
Recycle	Packaging Wastes	3.850	kg
	Other Hydraulic Oils	600	kg
	Vegetable Waste Oil	80	kg
	Electronic Waste	160	kg

KONYA EYISTE VIADUCT PROJECT

	Waste Type	Waste Quantity	Unit
Hazardous Waste	Contaminated Packaging Wastes	25	kg
	Filter	25	kg
	Vegetable Waste Oil	70	liter
	Medical Waste	3	kg
Non-Hazardous Waste	Domestic Waste	7,4	ton
	Waste Type	Waste Quantity	Unit
Disposal	Domestic Waste	7,4	ton
	Contaminated Packaging Wastes	25	kg
	Filter	25	kg
	Vegetable Waste Oil	70	liter
	Medical Waste	3	kg
Recycle	Iron	161,9	ton

BOUKHROUFA DAM PROJECT

	Waste Type	Waste Quantity	Amount of Waste in the Temporary Waste Area	Unit
Hazardous Waste	Medical Waste	6	0	kg
	Oil	56.200	40.000	liter
	Battery	228	50	piece
	Tyres - End of Life	1.135	1.135	piece
Non-Hazardous Waste	Domestic Waste	70,8	0	ton
	Scrap Iron	532	30	ton
	Waste Type	Waste Quantity	Birim	
Disposal	Oil	16.200	liter	
	Battery	178	piece	
	Domestic Waste	70,8	ton	
	Medical Waste	6	kg	
Recycle	Scrap Iron	502	ton	

SOUK TLETA DAM PROJECT

	Waste Type	Waste Quantity	Unit
Hazardous Waste	Oil	4.800	liter
Non-Hazardous Waste	Domestic Waste	147,22	ton
	Iron	9,8	ton
	Plastic	10,8	ton
	Waste Type	Waste Quantity	Unit
Disposal	Domestic Waste	147,22	ton
	Oil	4.800	liter
	Plastic Waste	10,8	ton
Recycle	Iron	9,8	ton

THE RATIO OF NUROL CONSTRUCTION SUBCONTRACTOR'S EXPENSES IN THE BUDGET

Project Title	Subcontractor Business Scope	Rate
BKAO Project	Earth Works Construction	21,70%
	Small Engineering Structures	2,65%
	Large Engineering Structures	10,29%
	Superstructure	23,20%
	Geotechnical Precautions	2,07%
	Landscape Works	1,81%
	Secondary Jobs	5,54%
	Other Materials and Transport	1,27%
	Leased Equipment	1,49%
KHEV Project	Earth Works Construction	2,11%
	Bored Piling and Shoring Works	0,88%
	Viaduct Reinforced Concrete Works	30,42%
	Leased Equipment	1,93%
BBFA Project	Earth Works Construction	16,31%
	Concrete Works	2,19%
	Injection Works	2,56%
BST Project	Concrete Works	3,73%
	Drilling and Injection Works	6,02%
	Hydromechanical	3,39%
	Other Works	1,83%

THE RATIO OF NUROL CONSTRUCTION SUPPLIER EXPENSES IN THE BUDGET

Project Title	Supplied Material	Rate
BKAO Project	Concrete	8,63%
	Pre-Stretched Steel Wire Rope	1,12%
	Expansion Joints	0,37%
	Aggregate	2,81%
	Pipes and Fittings Materials	0,62%
KHEV Project	Concrete	7,85%
	Iron	26,66%
	Aggregate	0,58%
	Steel Rope	6,72%
BBFA Project	Cement	0,57%
	Iron	2,79%
	Explosive Materials	2,30%
	Crushed	0,46%
	Additive	0,28%
BST Project	Rock	8,62%
	Concrete	7,10%
	Injection Mortar	0,64%
	Explosive Materials	1,19%

ABBREVIATIONS

YES	Governance Ecosystem Social	ISO	International Organization for Standardization
A.Ş.	Incorporated Company	KAÇUV	Hope Foundation for Children with Cancer
BBFA	Boukhroufa Dam Project	KHEV	Konya Eyiste Viaduct Project
PPS	Private Pension System	PPE	Personal Protective Equipment
BKAO	Gebze İzmir Motorway Balıkesir Kırkağaç Akhisar Section Project	LPPD	Personal Data Protection Law
UNGC	United Nations Global Compact	LNG	Liquified Natural Gas
BST	Souk Tleta Dam Project	LÖSEV	Health and Education Foundation for Children with Leukemia
CNG	Compressed Natural Gas	MOTAT	Mobile Hazardous Waste Transport
PLUMB	Foundation for the Protection and Promotion of Environment and Cultural Values	NATM	The New Austrian Tunnelling Method
EBRD	European Bank for Reconstruction and Development	QDMS	Quality Document Integrated Management System
ERP	Enterprise Resource Planning	SAP	Systems Analysis and Program Development
ENR	Engineering News-Record	SSI	Social Security Institution
EDK	Ethics Discipline Committee	SDG	Sustainable Development Goals
IMS	Integrated Management Systems	NGO	Non Governmental Organization
EBITDA	Earnings Before Interest, Taxes, Depreciation and Amortization	TMM	Türkiye Materials Marketplace
GRI	Global Reporting Initiative	TÜRKAK	Turkish Accreditation Agency
HEPP	Hyrdoelectric Power Plant	IFRS	International Financial Reporting Standards
IFC	International Finance Corporation	UKAS	UK Accreditation Service
IUCN	International Union for Conservation of Nature	UNGC	United Nations Global Compact
OHS	Occupational Health and Safety	VERBİS	Data Officers Registry Information System
OHS-E	Occupational Health and Safety, Environment	WEPs	Women's Empowerment Principles

UNGC CONTENT INDEX

The UN Global Compact is an initiative that encourages companies to operate responsibly and support society. Accordingly, the UN Global Compact strives to ensure that companies do not only add value to their financial resources, but also to people, communities and the planet. The UN Global Compact is the world's largest voluntary corporate sustainability initiative with 13.538 participants in 159 countries.

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Principle 2	Businesses should make sure that they are not complicit in human rights abuses.	83-89
LABOUR		
Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	83-89
Principle 4	the elimination of all forms of forced and compulsory labour;	80-81, 83-89
Principle 5	the effective abolition of child labour; and	80-81, 83-89
Principle 6	the elimination of discrimination in respect of employment and occupation.	80-81, 83-89
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ANTI-CORRUPTION		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.	30-31, 36-37

GRI STANDARD CONTENT INDEX

This Report includes information on the sustainability performance and implementation of Nurol Construction and Trading Co. Inc.'s projects included in the reporting period between 1 January 2019 - 31 December 2019.

Content of the report, Global Reporting Principles Standards: It has been developed in accordance with the basic option requirements, but has not been approved by the GRI organization.

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