



UET URAN ENDÜSTRİ TESİSLERİ İNŞAAT VE TİCARET A.Ş.

CODE OF CONDUCT AND BUSINESS ETHICS POLICY

REV	DATE	PREPARED BY	DEPARTMENT	APPROVED BY
00	15.07.2026	DENİZ TANDOĞAN HAZİNELİ	LEGAL, COMPLIANCE AND RISK MANAGEMENT DEPARTMENT	BÜLENT KARAKAŞ

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1. INTRODUCTION

This document sets forth the principles of business ethics that guide the conduct of all stakeholders involved in activities of UET URAN Endüstri Tesisleri A.Ş. ("UET URAN").

UET URAN is committed to conducting its business with integrity, fairness, and in full compliance with applicable laws and regulations.

Message from the Board of Directors

Dear Colleagues and Stakeholders,

At UET URAN Endüstri Tesisleri A.Ş. ("UET URAN"), we have always operated with the belief that integrity, respect, and professionalism are the foundations of our success. As we continue to expand across regions and deliver industry-leading projects, it is imperative that we remain committed to the highest standards of ethical behavior.

*This **Code of Conduct and Business Ethics Policy** is a reflection of our shared values and a guide to navigating the complex ethical challenges we may face in our work. Whether interacting with clients, suppliers, or colleagues, it is crucial that we maintain the trust and respect we have built over the years.*

We encourage every one of you to internalize this policy and act in accordance with its principles in your daily responsibilities. Together, by adhering to these values, we will continue to build not just successful projects, but a legacy of trust and integrity.

Thank you for your commitment to UET URAN's ethics and excellence.

Kind Regards

2. PURPOSE AND SCOPE

The purpose of this document is to set out ethical principles, core values and commitments that guide UET URAN'S actions. This Policy applies to all directors, managers, employees, agents, representatives, consultants, customers, suppliers, contractors, subcontractors, subsidiaries and stakeholders involved in UET URAN's activities. It defines our ethical principles and outlines the behaviors expected to ensure that UET URAN conducts its operations in a responsible and ethical manner.

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This Policy is approved by the Board of Directors and constitutes a binding corporate policy. It is communicated to all employees upon hire and periodically thereafter, is incorporated by reference into agreements with suppliers, subcontractors and other business partners where appropriate, and is made publicly available on the Company's website (www.uet.com.tr). Where this Policy sets a higher standard than applicable local law, this Policy shall be followed; where local law is stricter, local law prevails.

3. REFERENCE FRAMEWORKS AND INTERNATIONAL COMMITMENTS

This Policy has been prepared in line with, and shall be interpreted by reference to, internationally recognized standards and frameworks, including:

- ❖ the Ten Principles of the United Nations Global Compact;
- ❖ the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights;
- ❖ the fundamental conventions of the International Labour Organization (ILO), including those on child labor, forced labor, non-discrimination, freedom of association and collective bargaining;
- ❖ the OECD Guidelines for Multinational Enterprises and the OECD Convention on Combating Bribery of Foreign Public Officials;
- ❖ the requirements of ISO 9001 (Quality), ISO 14001 (Environment) and ISO 45001 (Occupational Health and Safety), with which UET URAN aligns its integrated management systems.

UET URAN supports the objectives of the United Nations Sustainable Development Goals (SDGs) and the Paris Agreement, and seeks to contribute to them through its operations, including its work on energy efficiency and decarbonization projects.



4. CORE VALUES

Our core values are as follows:

- ❖ Integrity: Integrity is at the heart of UET URAN's operations. It means consistently doing the right thing, even when no one is watching.
- ❖ Honesty: Honesty is fundamental to our success. We believe that being truthful and transparent in all our interactions builds trust with our clients, partners, and colleagues.
- ❖ Professionalism: We maintain the highest standards of professionalism and quality in every project.
- ❖ Reliability: At UET URAN, reliability means consistently delivering on our promises.
- ❖ Continuous Development: We are committed to the principle of continuous development, always seeking ways to improve and innovate.

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- ❖ **Fairness and Mutual Benefit:** At UET URAN, we believe in acting equitably and fostering relationships for mutual interest in good faith.
- ❖ **Human Resources as Greatest Asset:** We recognize that our most valuable asset is our people. We are committed to attracting, developing, and retaining top talent, knowing that the success of our projects depends on the skills, dedication, and innovation of our employees.
- ❖ **Respect for Human Rights:** We deeply respect and uphold human rights, ensuring that all individuals are treated with dignity and respect. We strive to create an inclusive work environment that promotes equal opportunity and values the diversity of our team, fostering a culture where everyone can thrive and contribute.
- ❖ **Compliance with Applicable Laws and Regulations:** Compliance with legal regulations is a non-negotiable value at UET URAN. We adhere strictly to all local and international laws governing our operations, ensuring that every project is conducted ethically and lawfully.
- ❖ **Commitment to Environmental Sustainability and Health & Safety:** At UET URAN, we are deeply committed to protecting the environment and ensuring the health and safety of our employees, partners, and communities. We strive to minimize our environmental footprint through sustainable practices, energy-efficient solutions, and responsible resource management.

5. COMPLIANCE WITH LAWS AND REGULATIONS

UET URAN is committed to full compliance with all international, national and local laws and regulations applicable in every country where it operates, including those relating to construction and engineering, permits and licensing, occupational health and safety, environmental protection, labor and social security, immigration and work permits, competition, anti-corruption, taxation, foreign trade, and export controls and sanctions. We hold our business partners, suppliers and subcontractors to the same standards.

Compliance is monitored by the Legal, Compliance and Risk Management Department, which advises the business on regulatory requirements, tracks legislative developments in all countries of operation, and reports material compliance matters to senior management and the Board of Directors.

6. HUMAN RIGHTS AND EQUAL OPPORTUNITY

UET URAN respects internationally recognized human rights throughout its operations and value chain, consistent with the Universal Declaration of Human Rights, the ILO fundamental conventions and the UN Guiding Principles on Business and Human Rights. We conduct human rights due diligence appropriate to the nature and location of our projects, and we expect the same from our business partners. In particular:

- ❖ **Prohibition of Child Labor:** We do not employ, and do not tolerate the employment of, any person below the minimum working age established by applicable law or ILO Convention No. 138, whichever is stricter.

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- ❖ **Prohibition of Forced Labor and Human Trafficking:** We prohibit all forms of forced, bonded, indentured or compulsory labor and any form of modern slavery or human trafficking. Employees are free to terminate their employment in accordance with law.
- ❖ **Non-Discrimination and Anti-Harassment:** We do not tolerate discrimination on the basis of race, color, ethnic or national origin, religion, sex, gender, sexual orientation, age, disability, marital status, pregnancy, political opinion, union membership or any other protected characteristic. Harassment, mobbing, bullying, abuse and any form of violence in the workplace are strictly prohibited and are subject to disciplinary action.
- ❖ **Diversity, Equity and Inclusion:** We promote a diverse and inclusive workforce, equal opportunity and equal pay for work of equal value, and we support the development and advancement of under-represented groups, including women in engineering and site roles.
- ❖ **Communities and External Stakeholders:** We respect the rights, health, safety, property and way of life of the communities living near our project sites. Community concerns and complaints may be raised through the channels set out in this Policy and are handled diligently and in good faith.
- ❖ **Security and Human Rights:** Where security services are used at our sites, they must be provided in a manner that respects human rights and applicable law.

7. LABOR PRACTICES AND WORKING CONDITIONS

Our people are our greatest asset. UET URAN provides fair, lawful and decent working conditions at its offices, workshops and project sites:

- ❖ **Employment Terms:** All employees are engaged under written employment contracts, are duly registered with the social security authorities, and receive clear information on their terms of employment.
- ❖ **Wages and Benefits:** Remuneration meets or exceeds the applicable legal minimum wage. Wages are paid regularly, on time and in full, together with all legally required benefits, overtime pay and social security contributions.
- ❖ **Working Hours:** Working hours, overtime, rest breaks, weekly rest days and annual leave comply with applicable labor legislation and relevant ILO standards.
- ❖ **Freedom of Association and Social Dialogue:** We respect employees' rights to freedom of association and collective bargaining under applicable law, and we do not discriminate against employee representatives. We maintain open channels of dialogue with our employees, including regular meetings, employee feedback mechanisms and satisfaction surveys.
- ❖ **Training and Career Management:** We invest in the professional and technical development of our employees through annual training plans, on-the-job training, mentoring and performance evaluations. Training needs are reviewed regularly, and training hours are monitored as a key performance indicator.

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- ❖ **Employee Wellbeing:** We promote a healthy work-life balance. Where the Company provides accommodation, catering or transportation at project sites, these are provided at decent standards, including safe and hygienic living quarters, adequate sanitation, clean drinking water, appropriate nutrition and rest areas.

8. OCCUPATIONAL HEALTH AND SAFETY (OHS)

The health and safety of our employees, subcontractor personnel, visitors and all persons affected by our activities is our first priority and a non-negotiable condition of doing business. UET URAN pursues a “zero harm / zero incidents” culture and maintains an OHS management system aligned with ISO 45001 and applicable OHS legislation in all countries of operation. In particular:

- ❖ **Risk Management:** Systematic hazard identification, risk assessments, safe method statements and permit-to-work systems are applied at all workplaces and project sites before and during the execution of works.
- ❖ **Training and Competence:** All personnel, including subcontractor workers, receive mandatory OHS induction and periodic training, and task-specific instruction. Only trained, competent and, where required, certified personnel perform high-risk activities such as work at height, lifting operations, confined space entry, hot works and electrical works.
- ❖ **Protective Measures:** Collective protection measures take precedence over personal measures. Appropriate personal protective equipment is provided to all workers free of charge and its use is mandatory.
- ❖ **Stop-Work Authority:** Every person at a UET URAN workplace has the right and the duty to stop any work that presents an imminent danger, without fear of reprisal.
- ❖ **Incident Management:** All incidents, near misses and unsafe conditions must be reported. Incidents are investigated to identify root causes, and corrective and preventive actions are implemented and tracked to closure.
- ❖ **Health and Emergency Preparedness:** We provide health surveillance appropriate to workplace risks, first aid facilities, and site-specific emergency response plans that are periodically drilled.

OHS performance is monitored through measurable objectives and key performance indicators (including lost time injury frequency rate, severity rate, near-miss reporting and training hours), which are reviewed regularly by senior management.

9. ENVIRONMENTAL RESPONSIBILITY

As an international industrial and EPC contractor operating in the energy, oil and gas, and industrial plant sectors, UET URAN recognizes its responsibility to protect the environment and to contribute to the transition to a low-carbon economy. We maintain an environmental management system aligned with ISO 14001, apply the precautionary principle, and require

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compliance with all applicable environmental laws, permits and project environmental and social requirements. Our commitments include:

- ❖ **Energy and Greenhouse Gas Emissions:** We monitor our energy consumption and greenhouse gas emissions, implement energy-efficiency measures at our offices, prefer energy-efficient equipment and logistics solutions, and support decarbonization and energy-efficiency projects.
- ❖ **Water:** We use water responsibly, prevent uncontrolled discharges, and manage wastewater at project sites in accordance with applicable standards.
- ❖ **Waste Management:** We apply the waste hierarchy (prevent, reduce, reuse, recycle, recover, dispose), segregate waste at source, and ensure that hazardous waste is stored, transported and disposed of only by licensed carriers and facilities with full documentation.
- ❖ **Materials and Chemicals:** Chemicals and dangerous substances are procured, stored, handled and disposed of safely, with up-to-date safety data sheets and spill prevention and response measures in place.
- ❖ **Prevention of Local Pollution:** We take measures to prevent and minimize dust, noise, vibration, and soil and groundwater contamination arising from construction and installation activities.
- ❖ **Biodiversity:** We use best efforts to minimize the impact of our activities on natural habitats, flora and fauna in and around our project sites.

Environmental objectives and key performance indicators (including Scope 1 and Scope 2 greenhouse gas emissions, energy consumption, waste quantities and recycling/recovery rates, hazardous waste compliance environmental incidents water consumption where material and training) are set, monitored and reviewed annually. Environmental incidents must be reported and are investigated in the same manner as safety incidents. All employees receive environmental awareness training appropriate to their roles.

10. ANTI-BRIBERY AND ANTI-CORRUPTION

UET URAN has zero tolerance for bribery and corruption in any form, whether involving public officials or private parties, and whether committed directly or indirectly through intermediaries, agents, consultants, joint venture partners or other third parties. We comply with the anti-corruption laws of all countries where we operate, including the Turkish Criminal Code, and with the principles of the OECD Anti-Bribery Convention and internationally recognized anti-bribery standards such as ISO 37001. In particular:

- ❖ **Bribes and Kickbacks:** Offering, promising, giving, requesting or accepting any bribe, kickback or other improper advantage, of any value, is strictly prohibited.
- ❖ **Facilitation Payments:** Facilitation or “grease” payments to expedite routine governmental actions are prohibited, except where necessary to protect life, liberty or

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safety, in which case they must be reported immediately to the Legal, Compliance and Risk Management Department and recorded accurately.

- ❖ **Gifts and Hospitality:** Gifts, hospitality and entertainment may only be given or accepted if they are reasonable, modest, infrequent, transparent, lawful, and not intended or likely to improperly influence a business decision. Cash or cash equivalents may never be given or accepted. Gifts and hospitality above the thresholds set out in the Company's internal procedures must be pre-approved and recorded.
- ❖ **Charitable Contributions:** Charitable donations and sponsorships must be lawful, transparent, approved in accordance with internal procedures, and never used as a vehicle for improper influence.
- ❖ **Money Laundering:** We take care to know our counterparties, and we do not accept, facilitate or ignore transactions that we know or suspect to involve the proceeds of crime.
- ❖ **Books and Records:** All transactions must be recorded accurately, fairly and in reasonable detail in the Company's books and records, supported by appropriate documentation and internal controls. Off-the-books accounts and false or misleading entries are prohibited.

11. FAIR COMPETITION

UET URAN believes in free, fair and undistorted competition and competes on the merits of its engineering capability, quality, safety performance and price. We comply with the applicable laws on the Protection of Competition. Accordingly, we do not enter into agreements or concerted practices with competitors to fix prices, rig bids or tenders, share markets, customers or territories, or limit production.

12. CONFLICT OF INTEREST

All directors, managers and employees must avoid situations in which their personal, family or financial interests conflict, or may appear to conflict, with the interests of UET URAN. Potential conflicts include, among others: holding a financial interest in, or performing work for, a competitor, supplier, subcontractor or client; participating in decisions concerning a counterparty in which a family member or close associate has an interest; outside employment or directorships that interfere with duties owed to the Company; and the personal use of Company opportunities, assets or information.

Any actual, potential or perceived conflict of interest must be disclosed in writing without delay to the relevant manager and the Legal, Compliance and Risk Management Department, which will determine the measures necessary to manage or eliminate the conflict. Persons affected by a conflict must refrain from participating in the related decision-making process.

13. CONFIDENTIALITY, PERSONAL DATA PROTECTION AND INFORMATION SECURITY

We protect the confidential and proprietary information of UET URAN, its clients, business partners and employees, including technical documentation, engineering designs, commercial

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terms, tender information and trade secrets. Confidential information may be used only for legitimate business purposes, may be shared internally only on a need-to-know basis, and may be disclosed externally only with proper authorization or where required by law. These obligations continue after the termination of employment or of the business relationship. We equally respect the intellectual property rights of third parties.

Personal data is processed in accordance with the Turkish Personal Data Protection Law No. 6698 (KVKK), the EU General Data Protection Regulation where applicable, and the data protection laws of the countries where we operate. We process personal data lawfully, fairly and transparently, for specified purposes, limited to what is necessary, and we implement appropriate technical and organizational measures to keep it secure. Actual or suspected data breaches must be reported immediately in accordance with internal procedures.

All users of Company information systems must follow the Company's information security rules, protect access credentials, and remain alert to cyber threats such as phishing and fraud attempts.

Actual or suspected information security incidents, cyber fraud attempts, unauthorized access, confidential information or personal data breaches may also be reported through the channels stipulated under Article 18 below.

14. PROTECTION OF COMPANY ASSETS AND ACCURATE RECORDS

Company assets – including funds, equipment, machinery, materials, vehicles, information systems and intangible assets – must be used responsibly, for legitimate business purposes, and must be protected against loss, theft, waste, fraud and misuse. All financial and operational records, reports, timesheets, progress reports, quality records and expense claims must be complete, accurate and truthful.

15. QUALITY AND SAFETY OF WORKS AND SERVICES

UET URAN maintains a quality management system aligned with ISO 9001 and executes its engineering, procurement, fabrication, construction, installation and commissioning works in accordance with applicable codes, standards, project specifications and good engineering practice. Non-conformities are identified, recorded and resolved transparently, and lessons learned are fed back into our processes as part of our commitment to continuous improvement and client satisfaction.

16. SUSTAINABLE PROCUREMENT, BUSINESS PARTNERS AND SUPPLY CHAIN

UET URAN is committed to building a responsible and sustainable supply chain and expects its suppliers, subcontractors, service providers and other business partners (together, "Business Partners") to conduct themselves in accordance with the principles of this Policy or equivalent standards of their own. Compliance with this Policy (or equivalent standards) is incorporated into our contracts with Business Partners, who are expected to cascade equivalent requirements to their own supply chains.

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UET URAN applies a risk-based due diligence approach to identify, prevent, mitigate, bring to an end and, where appropriate, remediate actual or potential adverse human rights and environmental impacts in its own operations, project sites and business relationships. Due diligence outcomes are considered in supplier selection, subcontractor approval, contract management, site monitoring, corrective action and business relationship decisions.

Business Partners may be subject to risk-based prequalification, sustainability assessment, audits, document requests, corrective action plans and performance monitoring.

Where products, materials or equipment are subject to customer carbon reporting, embedded emissions, CBAM/SKDM or similar regulatory data requests, Business Partners shall provide accurate and traceable information, including product description, HS/CN code, country of origin, production site, material weight, embedded emissions, recycled content and available EPD or product carbon footprint data.

Business Partners and relevant internal functions shall provide accurate, complete and timely sustainability, environmental, social, ethics, supply chain and climate-related data where required for customer reporting, regulatory disclosure, project requirements or sustainability assessments.

Serious or persistent violations of this Policy may result in suspension, withholding of approval, require remediation or termination of the business relationship.

17. COMMUNITY ENGAGEMENT, SOCIAL RESPONSIBILITY AND SECURITY

UET URAN aims to create lasting value in the communities where it operates. We take measures to minimize the disturbance caused by our construction activities (including traffic, noise and dust), prioritize local employment and local sourcing where feasible, and we engage with local communities and authorities openly and in good faith. Community members may raise concerns or complaints through the channels described in this Policy, and such complaints are handled diligently and without retaliation. Where security services are used at our sites, security providers are selected and instructed to act in a manner consistent with applicable law and respect for human rights, using force only when strictly necessary and proportionate.

18. COMPLAINT MECHANISM, WHISTLEBLOWING AND NON-RETALIATION

Every employee has a duty, and every Business Partner and external stakeholder is encouraged to report in good faith any actual or suspected violation of this Policy, of the law, or of the Company's internal procedures. Reports may be made through any of the following channels:

- ❖ the person's direct manager or the relevant department manager;
- ❖ the Legal, Compliance and Risk Management Department; or
- ❖ the dedicated ethics e-mail address ethics@uet.com.tr.

Reports may be made anonymously. The complaint mechanism shall be communicated in languages and formats that are understandable and accessible to employees, workers of Business Partners and relevant external stakeholders. Information on the available reporting channels shall

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be provided through employee onboarding, project and site inductions and other appropriate means. Particular attention must be given to ensuring effective access for migrant workers, posted workers, temporary workers and subcontractor personnel.

Reports shall be acknowledged within a defined and reasonable period, unless the report has been submitted anonymously through a channel that does not permit further communication. All reports shall be recorded in a secure and confidential case-management or tracking system, assigned an appropriate reference number and monitored through assessment, investigation, corrective action and closure. All reports are treated confidentially to the maximum extent possible, are assessed promptly, and, where warranted, are investigated fairly, impartially and diligently, respecting the rights of all persons involved, including the presumption of innocence.

Where a violation is substantiated, appropriate remedial and corrective actions shall be taken without undue delay. UET URAN shall also assess the root causes of the violation and strengthen relevant preventive measures, controls, training, contractual requirements or monitoring arrangements in order to reduce the risk of recurrence.

UET URAN strictly prohibits retaliation of any kind – including dismissal, demotion, harassment or any other adverse treatment – against any person who reports a concern in good faith or participates in an investigation. Retaliation is itself a violation of this Policy and will result in disciplinary action. Knowingly making a false or malicious report is likewise a violation of this Policy.

19. GOVERNANCE, IMPLEMENTATION, TRAINING AND MONITORING

Responsibility for this Policy is allocated as follows:

- ❖ **Board of Directors:** receives periodic reports on ethics and compliance matters.
- ❖ **General Manager:** approves this Policy, oversees and leads its implementation, by example, allocates the necessary resources.
- ❖ **Legal, Compliance and Risk Management Department:** administers this Policy on a day-to-day basis, advises employees, manages the reporting channels and investigations, delivers training, monitors compliance, and reports its findings to General Manager and the Board of Directors at least annually.
- ❖ **Managers:** communicate this Policy to their teams, ensure its application within their areas of responsibility, and support employees who raise concerns.
- ❖ **All Employees:** are required to read, understand and comply with this Policy, to treat colleagues with dignity and respect, to complete assigned training, and to raise questions and concerns.

This Policy is communicated to all employees as part of onboarding and through periodic awareness activities, and all employees receive ethics and compliance training on a regular basis. Implementation of this Policy is monitored through key performance indicators, internal audits and management reviews, and the results are used to drive continuous improvement. The effectiveness of the complaint mechanism shall be reviewed periodically using appropriate

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qualitative and quantitative indicators, which may include the number and categories of reports received, acknowledgement and closure times, the proportion of substantiated reports, corrective actions implemented, recurrence of similar issues, accessibility of the reporting channels and stakeholder awareness of the mechanism.

20. CONSEQUENCES OF VIOLATIONS

Violations of this Policy will not be tolerated. Where UET URAN identifies that it has caused or contributed to an adverse human rights impact, it will cooperate in legitimate remediation. Employees who violate this Policy are subject to disciplinary measures in accordance with applicable labor legislation and the Company's internal disciplinary procedures, up to and including termination of employment. Violations by Business Partners may result in corrective action, suspension or termination of the business relationship, and claims for damages. Where a violation may constitute a criminal offence, UET URAN reserves the right to refer the matter to the competent authorities.

21. REVIEW AND UPDATES

This Policy is reviewed annually, and whenever significant legal, regulatory or operational developments so require, by the Legal, Compliance and Risk Management Department, and any amendments are approved by the General Manager. The current version of this Policy is available on the Company's website and internal systems and supersedes all previous versions.

This Policy forms an integral part of UET URAN's governance, compliance, sustainability and management framework. It shall be read, interpreted and implemented in conjunction with the Company's other applicable policies, procedures, standards, forms and operational controls, which include without limitation the following documents:

- ❖ Employee, Labor and Human Rights Policy;
- ❖ Procurement Procedure;
- ❖ General Supplier Prequalification Form;
- ❖ Subcontractor HSE and Human Rights Addendum Form;
- ❖ HSE Procedure;
- ❖ Training Procedure; and
- ❖ Corrective and Preventive Action (CAPA) Procedure.