Code of Ethics and Standards Document

Basic Information and Compliance

Inclusivity

All employees of Akfen Construction must comply with the Code of Ethics. The Code of Ethics consists of the basic principles and business standards that will be consistently followed by the corporate management, employees and contracted business partners in all activities of Akfen Construction.

Honesty and Responsibility

Akfen Construction establishes a relationship based on honesty in all its processes and with all its stakeholders. Akfen Construction has adopted the principle of sharing its purposes and objectives and the path to be followed during the activity and the process with openness and honesty in all its activities and processes and in all its internal and external relationships.

Akfen Construction agrees to take the necessary measures according to the laws if it becomes aware of any acts committed in violation of the Code of Ethics in its internal and external activities, and to assume responsibility for any non-conformities that might arise in this case.

Respect and Justice

In all activities of Akfen Construction, it is essential that a business relationship is maintained with all natural persons and legal entities involved in these activities based on mutual respect without any discrimination. The concept of respect of Akfen Construction does not include superiority and supremacy, but it refers to a concept of respect based on equality.

Akfen Construction is a global legal entity operating in various geographies. Akfen Construction declares that it will primarily follow the legal system of the countries where it conducts its operations, recognize the superiority of global agreements and local laws, and maintain its activities according to such regulations.

Internal Code of Ethics

Individual Responsibility Approach

All employees of Akfen Construction are the representatives of the Company with their professional identities. The written and verbal statements and behaviors of all employees are directly or indirectly related to the corporate reputation of Akfen Construction.

The employees of Akfen Construction agree, as a principle, to act in accordance with the Code of Ethics created within the framework of global regulations. All employees are aware of and act in line with the principle that all their acts have an impact on the corporate reputation and business stakeholders.

Respect for People

At Akfen Construction, it is essential that each person working in the relevant position and task and all individuals with whom they have a business relationship outside the organization is respected as a human being first. Respect is the basis of the efforts of Akfen Construction to create a working environment where the people and personal development are valued, equal opportunities are provided and employee satisfaction is a top priority. Everyone agrees and declares to follow the principle of respect in all material and verbal communications and relationships.

Safety, Health and Environment

At Akfen Construction, the principles of health and safety of individuals, environmental compliance and protection of the environment are the matters taken into consideration before the concept of production. No business decision can be taken in a way that threatens human and environmental health and safety. Starting from the working environment, all necessary measures can be taken at the corporate and individual level initiatives so that all employees and external stakeholders live in a safe and healthy environment.

Protection and Confidentiality of Information

All employees and stakeholders having insider information are obliged to protect any information about Akfen Construction that has not been approved in writing for disclosure to the public.

Employers have adopted the principle of keeping confidential all types of market information and strategies, which are legally regulated and treated as corporate trade secrets by Akfen Construction, as well as the legal/actual personal data of their employees. Irrespective of the purpose and platform, such information cannot be shared even in part.

In the cases where employees represent the Company corporately or individually; if a request is forwarded to the employees at any level to disclose any or all trade secrets of the Company, such request cannot be fulfilled without first applying to the internal authorities.

Reporting the Non-Conformities

All employees are entitled to report any practices which they consider to be in violation of the Code of Ethics to the competent authorities. In addition, an Ethics Committee was formed within Akfen Construction.

Akfen Construction has created an "Ethics Line" as an ethics communication channel and defined the relevant procedures. Information about the Code of Ethics and the Ethics Line is published on the website of Akfen Construction and the Intranet Page of Akfen Corporate (Akfen'iz).

When a situation that violates the Code of Ethics is reported, it is guaranteed that the personal information of the reporter will be kept confidential and all his/her rights will be protected.

Corporate Citizenship

The employees of Akfen Construction are inherently in the status of corporate citizens of the geography where they are located, at the times that they individually represent the Company. As a requirement of corporate citizenship, it is encouraged and supported to propose and implement any efforts that will support the economic, social and environmental development of such geography.

All corporate social responsibility practices of Akfen Construction are open to voluntary participation of employees at all levels within the framework of their competencies and qualifications. Akfen Construction exerts all its efforts to support the individual volunteer activities of all its employees, including non-corporate projects.

Relationships with Business Partners

The justice, openness and transparency approach is essential in all relationships with unions, associations and other organizations operating in the same and different business lines, particularly with product and service providers.

Any relationship and practice that would provide privileges to suppliers in a way that would prevent fair competition and cause conflicts of interest is avoided. Likewise, adherence to the principle of openness is essential in the relationships with natural persons/legal entities, including the unions operating within the same corporate business line and non-governmental organizations having interests and activities in this field.

Competition Approach

Together with all its employees, Akfen Construction adopts and supports fair competition approach in all its activities including in its main business line and in its relationships with the business partners. It takes a firm stance and takes necessary measures against any practices that might lead to unfair competition both in its own business line and in the business areas and sectors where it receives and provides services.

Any practices that would lead to monopoly beyond the competitive advantages permitted by the laws, as well as causing imbalance in the market through collaboration with competitors and abuse of power and competitive advantage are unacceptable.