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Code of Ethics of Akfen İnşaat Turizm ve Ticaret A.Ş.

Compliance with Laws

While operating in various sectors and business areas with the goal of becoming a sustainable corporation; we are governed by a wide range of regulations. We interact with many different individual and corporate groups including customers, employees, partners, shareholders, banks, competitors, media, subcontractors, official institutions, etc. on a daily basis. We maintain our business relationships with these stakeholders in a respectful, ethical and legal way.

Respect for Equal Opportunities

As Akfen Construction, we are respectful of different cultures, traditions and business practices that we encounter in the business areas where we operate. In this regard, we recognize and value the religious, structural and cultural differences of the stakeholders that we interact with. We treat everyone equally irrespective of religion, language, race, gender, age and ethnicity.

Respect for Intellectual Property Rights

By acting in full compliance with the laws and regulations regarding the protection of the intellectual property rights of all individuals and organizations; we avoid intentional and unauthorized use and illegal copying of trademarks, patents, logos, copyrights, trade secrets and computer programs as well as other intellectual and industrial rights belonging to other organizations.

Receiving and Giving Gifts

We are aware that the practices of receiving and giving gifts may be different according to local cultural values, and we manage the exchange of gifts honestly and by recording them in a way that does not contradict the principles and policies of Akfen Construction, does not damage our reputation and does not constitute a legal crime. We always refrain from receiving and giving gifts, donations or hospitality that might positively or negatively affect our decisions in business transactions.


Acceptable Gifts and Hospitality

- * Having a reasonable financial value,
- * Required for the purpose of the job,
- * Compliant with the laws,
- * Consistent with local customs and practices.

Unacceptable Gifts and Hospitality

- Cash and equivalents,
- Perceived as bribes, having a high financial value,
- Purchases made from private sources,
- All gifts and hospitality that damage the reputation of Akfen Construction

Corruption, Bribery and Borrowing

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As the employees of Akfen Construction, we never accept receiving, giving or offering bribes under any circumstances. We do not ask for any special privileges from subcontractors, suppliers, consultants, competitors or customers.

THE GLOBAL COMPACT

The Global Compact, a voluntary initiative supporting sustainable development and good corporate citizenship practices, is a set of principles based upon universally-recognized principles. This forum, which is focused on learning and open to sharing experiences, is also a network providing communication between organizations and other stakeholders. Akfen Holding A.Ş., as our main shareholder, signed the **United Nations Global Compact on July 2, 2002** to contribute to the formation of a common culture in the business world within the framework of universal principles. By signing the Global Compact, we became the first holding company in Turkey to sign the Global Compact.

The Global Compact prescribes that companies operate in close cooperation with the United Nations within the scope of 10 principles in the areas of human rights, labor standards, environment and corruption. Akfen Construction has also adopted the Global Compact standards as an affiliate of Akfen Holding.

Competition Measures

Akfen Construction maintains transparent communication with public authorities and keeps its level of communication in compliance with the competition regulations of the relevant country.


Akfen Construction maintains the same ethical, transparent and fair approach in its relationships with its competitors and avoids any acts that might be anti-competitive, operates in full compliance with the designated confidentiality rules and takes a stance against any actions that might constitute steps towards monopoly or trust.

Information Management

Information Confidentiality

Akfen Construction uses its own confidential and non-public information only for its fields of activity and for process improvements to the extent permitted by legal regulations for the purpose of protecting such information; and we refrain from using such information for our own personal interests. We do not share the corporate information, which we become aware of due to our field of activity or the operations for which we are responsible, with any internal or external parties without valid and legal permissions. We are aware of the importance of keeping the information that we obtain confidential, even if our working hours or our job at Akfen Construction ends. Otherwise, we know that we would place the company and ourselves at severe legal risks. We sign Personnel Employment Agreements and Information Security Contracts to prevent misuse of information.

We do not share confidential information with our family, friends or third parties. We do not talk about or discuss confidential information in the places where third parties can hear them, in the company cafeteria or in the corridors. We do not keep or use the written or electronic

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documents containing confidential information in public spaces where third parties can see them.

Information Security

Based on the awareness of the importance and necessity of protecting information integrity and information accessibility, we keep our corporate records in full compliance with legal regulations and protect them against unauthorized access. We collect, process and store the most of our records electronically and keep them accessible for use by other computers via the network.

Preventing the unauthorized use, modification and deletion of information in our area of responsibility is a legal requirement as well as a business obligation. For this reason, in the cases where we suspect a security violation, we always inform our senior manager and ask for support from the Information Processing Department in case of necessity.

We access to the corporate records with personalized encryption, use licensed products, update the passwords periodically in accordance with the password policy, use and update anti-virus programs actively and keep our operating system up to date.

Social Media


Based on the awareness of the role and potential of social media in today's world of interaction; we refrain from making statements or expressing opinions on behalf of Akfen Construction on virtual platforms (Facebook, Twitter, Instagram, blogs, LinkedIn, etc.) without the knowledge/approval of the spokespersons of our Company. We inform the Corporate Communications Department in charge of media relationships about any concerns or hesitations in relation with the news that we read or see about Akfen Construction. Depending on the subject, our areas of responsibility are as follows: the Corporate Communications Department is responsible for general media communications, our Investor Relationships Department is responsible for public operational and financial performance, our Legal Affairs Department is responsible for corporate practices and legal regulations and our Human Resources Department is responsible for employees and potential employees.

Conflict of Interests

We monitor and prevent the situations where our individual interests may conflict with the interests of Akfen Construction or relevant individuals and organizations. When we perform our tasks, we keep the interests of Akfen Construction above everything and avoid any actions that would mean using corporate resources or reputation in the interests of ourselves or our relatives.

Possible Cases of Conflict of Interests:

- The family or up-to-third degree relatives of an employee engaged in business relationships with Akfen Construction
- The family or up-to-third degree relatives of an employee having ownership and interest relationships in competitors
- Awarding jobs to the companies where the family or up-to-third degree relatives of an employee work

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- An employee maintaining business relationships with the companies that he/she cooperates with.

Working Outside the Company

The employees cannot work in public or private corporations without the knowledge and approval of Akfen Construction, they do not accept a permanent or temporary, paid or unpaid position beyond their jobs at Akfen Construction, and they cannot work in another company or organization and cannot provide consulting services to them.

Responsible Working Approach

As the employees of Akfen Construction, we believe in sustainable working principles that take the needs of the society into consideration and create added value for the society based on our identity of responsible corporate citizen. We build and maintain relationships with all our stakeholders based on respect and trust.

Environmental Interaction

We aim to live in an environmentally-sustainable world and leave a healthy, clean and livable world to the next generations; for this purpose, we place importance to using high standard practices in our operations in accordance with the relevant legal legislations and regulations. We know that the most important legacy that we will leave to the next generations will be the environment, we avoid unnecessary use of energy and natural resources, operate according to the principle of protecting the environment in all our investments and seek for the ways to minimize consumption of wastes.


We refrain from any violations of the environmental requirements that might damage the health and rights of employees, customers and the local community where we operate. In this regard, we report any damage caused by us on the environment when making business decisions, act in a way that minimizes negative impacts and take preventive measures for this purpose.

Human Rights

We support fundamental human rights and encourage these rights when conducting our activities:

- Freedom of thought
- Right to privacy
- Right to fair and equal working
- Right to participation
- Respect for private life
- Respect for the right to personal security
- Respect for ownership rights
- Preventing cruel, inhumane or degrading treatment
- Freedom of expression

Contribution to Society

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Based on the awareness of corporate social responsibility, we implement initiatives that will contribute to the development of the society through foundations and associations that we support for the purpose of raising qualified human resources for the society. We support individual initiatives, which reflect the values of Akfen Construction and which are useful for the society. We conduct volunteered works after the working hours and by using our own resources.

Accuracy in Financial and Business Records

The sustainable business relationship that we build with our stakeholders is based upon our reputation that creates trust. Based on this awareness, we record and report all types of information regarding our operations accurately, consistently and completely. We submit actual and valid information being prepared in accordance with the laws and reflecting the truth about Akfen to the public and other official authorities in a timely manner.

Use of Corporate Resources

We always protect the resources, machines, equipment, fixtures and vehicles of Akfen Construction and prevent the misuse, damage, loss, lending, renting and selling of these assets to others. We also refrain from personal use of the communication and transportation means allocated within the framework of authorizations and responsibilities required by our positions.

Safe Working Environment

Violence in the Workplace

We consider any situation where our employees are abused, exposed to non-physical violence such as pressure and threats and their safety and health are compromised as an element of violence. We do not tolerate any behavior or action that includes harassment, threats and physical violence in any form; we initiate the necessary legal process in case of occurrence of such a situation.

Health and Safety

We place importance to creating a healthy, safe and secure working environment. We demonstrate maximum attention to complying with health and safety requirements in all our operations at our Company, enterprises and construction sites, and take all measures required not to risk the health and safety of ourselves and others. We follow up and ensure full compliance with the regulations and developments in the field of occupational safety. The health and safety of our employees is top priority for us. We conduct both internal and external audits regarding occupational health and safety.