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ETHICS POLICY

TEKFEN aims to follow and sustain a culture and consciousness of being an honest, hardworking and responsible person, committed to basic human rights and global principles, and turn this ideal into reality through an understanding of love, respect, patience, tolerance, cooperation, fairness and innovation from its founding partners. In this context, Tekfen considers ethical rules as one of the cornerstones of its corporate culture. The approach of responsibility to customers, employees, shareholders, suppliers, business partners, competitors, the environment and society on the basis of ethical rules adopted by the Company's senior management and all employees under its roof is secured on a basis of honesty, confidentiality of trade secrets and private information, conflict of interest, and compliance with laws and regulations. In this context, Tekfen adopts the following principles.

- Expects its employees to adopt the principles of being honest, fair and reliable, respecting moral values and applying the highest standards of behavior in their work.
- Respects employee rights, private lives, personal rights, does not discriminate against employees, aims to create a fair, constructive, creative and trusting environment where different ideas are freely expressed, and encourages all employees to contribute to this purpose.
- Takes the economic, environmental and social aspects into account in order to create a sustainable and long-term value in its business.
- Complies with the legislation of the countries in which it operates, supports a fair competition environment, and does not tolerate corruption and bribery.
- Establishes written rules to prevent conflicts of interest, and makes public the rules pertaining to the use of Tekfen Group's assets.
- Supports the fight against activities related to obtaining an income from crime or financing terrorism, and does not tolerate acts that violate laws and regulations under any circumstances.
- Determines the principles of organization, responsibilities, execution and implementation regarding the follow-up of ethical issues, regulates the conduct of the investigations within the company on the basis of impartiality, confidentiality and justness, and in accordance with the declared policies, procedures, ethical rules and investigation principles, and communicates these with its employees.
- Tekfen Group shares its Code of Business Ethics with its employees, managers, group companies and business partners in order to guide and assist them in case of any concerns about ethics, and offers practical solutions.

Cahit OKLAP
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