Code of Business Conduct & Anti-Bribery and Corruption ("ABC") Policy

General Manager's Message

Dear Colleagues,

We observe, know and are proud of the fact that, due to its established culture of doing business and communication within its own community and its business partners, Tekfen Imalat, who is one of the leading manufacturing companies of Turkey, is a reliable institution with its increasing credibility along years; and is taking an important role in the building up, maintaining and encouraging of the public trust and belief in the business community.

Tekfen Holding and our Company, who is a member thereof, are founded on this culture.

This is also a fact which is known and appreciated by our clients and business partners.

As known by all and observed time to time, credibility of some powerful companies having international reputation and reliability can easily be harmed due to behaviours of one or more employees or managers non-conforming to internationally accepted rules of business ethics, and therefore concerned institution may incur great and irreparable damages. In such circumstances, the company credibility established through diligent and sacrificial efforts of all its members and employees along many years can be lost in a very short time.

As our success and achievements for the better depend on protection and enhancement of our credibility, the task of ensuring and maintaining this does fall upon all our employees together with our managers.

Continuing to do business with integrity and within the harmony and peace among all its employees do require maintenance of the working environment conforming to the existing positive public perception and credibility of our Company. Maintaining this asset is possible by way of doing right things by each and every individual of us and being aware of the value of this asset. In order to ensure that we will be in these right-doings we must comply with the principles and rules set out hereunder (Tekfen Imalat Code of Business Conduct & Anti Bribery and Corruption Policy) and we are all assigned with this task. As the compliance of our behaviours and practices with the principles and rules set out hereunder are the expectations of our clients and business partners from us, we are also expecting, and will expect, their behaviours and practices being compliant with these and similar international rules.

Dear colleagues, these principles and rules are the guides for all Tekfen Imalat community in doing and managing business. Let us all carefully read, review and understand these principles and rules. You must attend all the trainings that will be given from time to time on the subject matter, and in case of questions and queries, you should ask for clarification and opinion from the Compliance Officer and/or Legal Department.

I am sure that, with the consciousness and the care that you will show and exercise to comply with these principles and rules, our Company will continue to protect and enhance its credibility and the trust it has built in its business market place.

Thanks in advance for the support to the stance and efforts of our Company on the subject matter; for the contributions to, awareness and care that you will give and dedicate for this purpose.

Best Regards,

A. Malik Arun General Manager