

1. Akfen Codes of Ethics

1.1 Compliance With Laws

While operating in various sectors and business areas with our goal of being a sustainable country company; we are subject to many different laws. We interact with different individual and corporate groups every day, like customers, employees, partners, shareholders, banks, competitors, media, subcontractors, official institutions, etc. We maintain our business relationship with all stakeholders in a respectful, ethical and legal manner.

1.1.1 Respect for Equal Opportunities

As Akfen, we respect the different cultures, traditions and business practices we encounter in our business areas. In this sense, we acknowledge and value the religious, structural and cultural differences of the stakeholders we interact with. **We treat everyone equally, regardless of religion, language, race, gender, age, or ethnic origin.**

1.1.2 Respect for Intellectual Property

Acting in accordance with the laws and regulations on the protection of the intellectual rights of all persons and organizations; We avoid knowingly and unauthorized use and illegal copying of brands, patents, logos, copyrights, trade secrets and computer programs and other intellectual and industrial rights belonging to other organizations.

1.1.3 Receiving and Giving Gifts

Aware that the practice of receiving gifts and giving gifts may differ according to local cultural values; We conduct the gift exchange process honestly and by recording it in a manner that does not violate Akfen principles and policies, does not damage our reputation and does not constitute a legal crime. **We always avoid receiving or giving gifts, grants or entertainment offers that may affect the decision positively or negatively in commercial transactions.**

Gifts and Entertainment Acceptable

- Its tangible value is reasonable,
- As a requirement of the purpose of work,
- In accordance with the laws,
- Consistent with local customs and practices.

Strictly Unacceptable Gifts and Entertainment

- Cash money and its substitute,
- Perceived as bribery, with high financial value
- Purchases made from private sources,
- All gifts and entertainment that could damage Akfen reputation.

1.1.4 Corruption, Bribery and Borrowing

As Akfen employees, we do not accept, accepting, giving or offering bribes, under any circumstances. We do not solicit personal privileges from subcontractors, suppliers, consultants, competitors or customers.

GLOBAL COMPACT

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Global Compact; It envisages companies to work in close cooperation with the UN within the scope of 10 principles in the fields of human rights, labor standards, environment and corruption. Article 10 on corruption is given below.

Corruption

- Principle 10. Businesses should fight against all forms of corruption, including bribery and discrimination.

Extortion, fraud, embezzlement, money laundering, illegal financing of political parties are strictly prohibited.

1.1.5 Anti-Competition Measures

Akfen Renewable Energy communicates transparently with public authorities and keeps its level of communication in accordance with the fair competition laws of the relevant country.

Akfen Renewable Energy maintains the same ethical, transparent and fair approach in relations with its competitors, avoids any anti-competitive behavior, abides by the established confidentiality rules, and takes attitude against any action that may lead to monopolization or trust building.

1.2 Knowledge Management

1.2.1 Information Privacy

In order to protect confidential and non-public information belonging to Akfen, as permitted by legal regulations, we use it only for company fields of activity and process improvements, and avoid using it for our own personal interests. We do not share company information that we have acquired due to our field of activity or operations for which we are responsible, with people inside or outside the company without valid and legal permissions. We are aware of the importance of keeping the information we obtain confidential at all times, even if our working hour or our duty at Akfen ends. Otherwise, we are aware that we are putting the company and ourselves at serious legal risk. In order to prevent the misuse of information, we take the necessary precautions with Personnel Employment Contracts and Information Security Contracts.

- We do not share confidential information with our family, friends or third parties.
- We do not speak or discuss confidential information in places where third parties can hear it, in the corporate cafeteria or in the corridors.
- We do not keep and use written or electronic documents containing confidential information in public environments where third parties can see them.

1.2.2 Information Security

Aware of the importance and necessity of protecting information integrity and accessibility; We keep our company records in accordance with legal regulations and protect against unauthorized access. We collect, process, store and transfer most of our records electronically to other computers over the network.

The prevention of unauthorized use, modification and deletion of the information in our area of responsibility is a legal requirement as well as our business obligation. Therefore, in cases where we suspect a security vulnerability, we definitely inform our senior manager and request support from the Information Technologies Department in case of need.

- Access to company records with personalized encryption,
- Uses licensed products,
- Akfen periodically updates password in line with its password policy,
- Actively uses and updates anti-virus programs,
- We keep our operating system up to date.

1.2.3 Social Media

Being aware of the role and potential of social media in today's interaction world; We avoid making statements and commenting on behalf of Akfen on virtual platforms (Facebook, Twitter, blog, LinkedIn etc.) without the knowledge / approval of company spokespersons. We inform the Corporate Communications Unit, which is responsible for media relations, for our concerns and hesitations about the news we read or see about Akfen. Our areas of responsibility according to the subject; Our Corporate Communications Unit is responsible for general media communication, our Investor Relations Unit for public

operational and financial performances, our Deputy General Directorate of Legal Affairs for company practices and legal regulations, and our Human Resources Unit for employees and potential employees.

1.3 Conflict of Interest

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We observe and prevent situations where our individual interests may conflict with the interests of Akfen or related persons and institutions. While fulfilling our duties, we keep Akfen's self-interests above all else, and avoid any behavior that means gaining benefit to us or our relatives by using Akfen's resources or reputation.

Possible situations to be encountered;

- Having a commercial relationship with Akfen by the family of the employee or persons who are up to third degree relatives,
- Ownership and interest in the employee's family or relatives up to third degree in competitor companies,
- Employee employing companies with family or relatives up to third degree,
- The employee has a commercial relationship with the companies he / she does business with.

1.3.2 Additional Work

Except for Akfen's knowledge and approval, we do not accept any permanent or temporary, paid or unpaid job, do not work in any other institution or organization, and do not provide consultancy.

1.4 Responsible Work Approach

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

1.4.1 Environmental Interaction

We aim to live in an environmentally sustainable world and leave a healthy, clean and livable world to future generations; for this purpose, we attach importance to using high standard practices in our activities within the framework of the relevant legislation and regulations. With the awareness that the most important heritage we will leave to future generations will be the environment; We avoid using energy and natural resources unnecessarily, act with the principle of environmental protection in our investments and look for ways to reduce waste consumption.

We avoid violations of environmental rules that may harm the health and rights of our employees, customers and those living in the region where we operate. In this context, while making our business decisions, we report the damage to the environment, act in a way to minimize the negative effects and take preventive measures.

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Environment

- Principle 7. Businesses should take precautions for the environment in advance, show the necessary awareness and struggle.

- Principle 8. They should support any activity and formation that will increase environmental responsibility.
- Principle 9. They should support any practice that will help the diffusion and development of environmentally friendly technologies.

1.4.2 Human Rights

We support the fundamental human rights set forth in the United Nations Global Compact and we encourage these rights while conducting our activities with the title of the first Holding to sign the Convention.

- Freedom of thought
- Right to privacy
- The right to fair and equal work
- Right to participate
- Respecting for private life right
- To respect the right to personal security
- Respecting property rights
- To prevent cruel, inhuman or degrading treatment
- Respecting freedom of expression
- Preventing complicity in human rights violations
- Respect the rights of indigenous peoples

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Human Rights

- Principle 1. Businesses should support and respect their declared human rights.
- Principle 2. They should not abuse these rights in any way.

Labor Standards

- Principle 3. Businesses should allow and support workers' rights to collective bargaining and associations.
- Principle 4. The practice of forced labor should be ended.
- Principle 5. Employment of all child workers should be stopped.
- Principle 6. Discrimination in workers and workforce should be ended.

1.4.3 Contribution to Society

With the awareness of corporate social responsibility, we implement activities that will contribute to the development of society through foundations and supported associations in order to bring quality human resources to the society. We volunteer to support individual works that reflect Akfen values and benefit society. We do volunteering outside of our working hours and with our own resources. We adopt the principles of every agreement signed by Akfen as a corporation.

1.4.4 Accuracy in Financial and Business Records

Our reputation that builds trust is at the heart of the sustainable business relationship we have built with our stakeholders; Based on this, we record and report all kinds of information regarding our activities accurately, consistently and completely. We present the current and valid information about Akfen, which is regulated in accordance with the law and reflects the truth, to the public and other official institutions in a timely manner.

1.4.5 Use of Akfen Resources

We always protect Akfen's resources, machinery, equipment, fixtures and vehicles and we prevent misuse, damage, waste and lending, renting and selling to others. Also; We avoid personal use of communication and transportation facilities provided within the framework of the authorities and responsibilities required by our positions.

1.5 Safe Working Environment

1.5.1 Violence in Workplace

We consider every situation where our employees are abused, subjected to non-physical violence such as pressure or threats, and where their safety and health are put at risk as an element of violence. Without tolerating any behavior or action that includes harassment, threats and physical violence in any form; When faced with such a situation, we initiate the necessary legal process.

1.5.2 Health and Safety

We attach importance to creating a healthy, safe and secure working environment. While showing the utmost care to comply with health and safety issues in all our activities in our company, our businesses and our construction sites; We take all kinds of precautions in order not to risk the health and safety of ourselves and others. We follow the regulations and developments regarding occupational safety and avoid negligence.