



03/03/2014

H.E.Ban Ki-Moon

Secretary – General

United Nations

New York, NY 10017

USA

Dear Mr. Secretary – General,

I am pleased to confirm that Mehmet Gokdemir Insaat Sanayi ve Ticaret Limited Sirketi supports the ten principals of the Global Compact with respect to human rights, labour, environment and anti-corruption. With the communication, we express our intend to advance those principals within our sphere of influence. We are committed to making the Global Compact and its principals part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Millennium Development Goals. Mehmet Gokdemir Insaat Sanayi ve Ticaret Limited Sirketi will make a clear statement of this commitment to our stakeholders and the general public.

Mehmet Gokdemir Insaat Sanayi ve Ticaret Limited Sirketi has a zero – tolerance policy for corruption, bribery and extortion. It is the policy of the company to pursue all of its business transactions in an honest and ethical manner.

We recognize that a key requirement for participation in the Global Compact is the annual submission of a communication on Progress (COP) that describes our company's efforts to implement the principals. We support public accountability and transparency, and therefore commit to report on progress within one year of joining the Global Compact, and annually thereafter according to the Global Compact COP policy.

Sincerely Yours,

Ms. Burcu Davgana

Deputy General Manager

Mehmet Gökdemir İnşaat Sanayi ve
Ticaret Limited Şirketi
269/13. Sk. No: 1/3 Bornova - İZMİR
Tel: 0 232 447 13 28 Fax 347 13 34
Borç 240 614 000 3050

Mehmet Gokdemir San. Tic ve Ltd. Sti
269/13 sok. No:1/3
Bornova/İZMİR
Turkey

22 April 2011

Code of Ethics (CoE)

1. Fundamental Principles

Mehmet Gokdemir Insaat's fundamental goal is to promptly perform all contracted assignments in accordance with international criteria, effective laws, specifications and standards, achieving profitability without compromising quality, environmental, health and safety requirements.

The purpose of the management system is to identify the safety hazards regarding the environment, occupational health and security in accordance with effective laws and regulations, to conduct the necessary risk analyses to eliminate risks at its source, to protect the environment, human life and property.

2. Compliance with Laws

We conduct business in compliance with all laws, regulations and other legal requirements applicable wherever we conduct business.

- We respect and prioritize laws and regulations. We pursue profits through business activities that comply with all relevant laws.
- We do not engage in any unfair acts such as directly or indirectly gift-offering or giving, agreeing on a loan, award, advantage or benefit, entertainment and bribes that would cast doubt on our fairness. Nor do we make false accusations against other companies.
- We secure sound profits through fair and free competition as we strive to expand our business
- It is unacceptable for us to solicit, accept, offer, promise or pay bribes.
- We do not engage in any fraudulent practices and immediately sever our relations who attempt to do so.
- We fight against anti-money laundering and never consent such actions.

3. Conflicts of Interest

We must ensure that no conflict exist between our personal interests and those of the company. A conflict of interest occurs when our interest of our family members compete with our ability to perform our job responsibilities.

MEHMET GÖKDEMİR
İNŞAAT SAN. TİC. LTD. ŞTİ.
269/13 Sok. No:1 D.3 Bornova-İZMİR
Tel: 0232 347 13 28 Fax: 0232 347 13 33
Bornova İZMİR 355 5858

Delivered by: *PricewaterhouseCoopers Danışmanlık Hizmetleri Ltd. Şti., Maya Akar Center, Büyükdere Caddesi No:100-102 B Blok Kat 17 Esentepe 34394 İstanbul-Türkiye*
T: +90 (212) 355 5858, F: +90 (212) 355 5850, www.pwc.com/tr

4. Respect for Human Rights and Diversity

We recognize that all individuals are equal and they have the right to have a workplace environment where they are treated with dignity, fairness and respect.

- Neither we nor any person acting on behalf of our company shall discriminate against any person with regard to employment based on national or ethical origin, color, religion, sex, marital status, family status, disability and conviction.
- We do not use our authority or position on the job to engage in any form of harassment that would damage the integrity of the workplace.

5. Handling Information Confidentially

We appropriately and strictly manage all personal information that we have obtained to prevent information from being moved unnecessarily or data being sent by mistake through a lack of caution, and we ensure that all such information is only used for its initially stated purpose.

6. Health, Safety and Environmental Responsibility

We take the initiative to protect the global environment and prioritize environmental consideration. We are committed to meet the industry standards and regulations.

- We appropriately evaluate the environment impact of our business and thoroughly study environmental problems and share the knowledge we gain with the community.
- In our efforts to resolve environmental problems, we strive to strengthen relationships with like-minded individuals, and each one of us takes eco-friendly actions and participates in activities to give back to the environment.
- Safety and health come before anything else, and are the foundation of our ability to work. We are mindful of both health and safety, and supervisors look out for the mental and physical health of their subordinates. To prevent workplace injury and illness we must:
 - Follow all applicable safety laws and regulations
 - Comply with our company's safety policies in our facilities
 - Conduct ourselves in a safe manner

MEHMET GÖKDEMİR
İNŞAAT SAN. TİC. LTD. ŞTİ.
269/13 Sk. No:1 D.3 Bornova-İZMİR
Tel: 0232 847 13 28 Fax: 0232 347 13 38
Bornova V.D. 814 800 3650

Delivered by: PricewaterhouseCoopers Danışmanlık Hizmetleri Ltd. Şti., Maya Akar Center,
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T: +90 (212) 355 5858, F: +90 (212) 355 5850, www.pwc.com/tr