



**FRAPORT TAV
ANTALYA TERMİNAL İŞLETMECİLİĞİ A.Ş.**



**COMPLIANCE MANAGEMENT SYSTEM
GUIDELINE (CMS)**

(Uyumluluk Yönetim Sistemi Kılavuzu)

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Table of Contents

PREFACE.....5

1. PURPOSE, SCOPE.....5

1.1. Purpose5

1.2. Scope.....5

2. OUR VALUES.....5

3. CORPORATE CULTURE.....5

4. COMPLIANCE ORGANIZATION- DUTIES AND RESPONSIBILITIES.....6

4.1. Compliance Organization Chart6

4.2. Compliance Duties and Responsibilities6

4.2.1. Fraport TAV Senior Management.....7

4.2.2. Local Compliance Officer = LCO.....7

4.2.3. Compliance Boards and Committees8

4.2.3.1. Ethical Consulting8

4.2.3.2. Risk Assessment Committee.....9

4.2.3.3. Ethics Committee.....9

4.2.4. Duties and Responsibilities of Employees9

4.2.5. Duties and Responsibilities of Managers..... 10

4.2.6. Corporate Duties and Responsibilities 10

4.2.7. Fraport AG and TAV Compliance Reporting Responsibilities 10

5. FRAPORT TAV ETHICS PRINCIPLES AND POLICIES 11

5.1. Compliance With Law 11

5.2. Respect For Human Rights 11

5.3. Conflicts of Interest..... 12

5.4. Receiving and Giving Valuable Gifts, Invitation and Hospitality Rules 12

5.5. Bribery, Corruption, Theft, and Other Shameful Situations 12

5.6. Economic Sanctions and Money Laundering 13

5.7. Facilitation Payments (Small payment to Corporate-Establishment employees) 13

5.8. Second Job Statement 13

5.9. Psychological Harassment and Discrimination 14

5.9.1. Mobbing (Psychological Harassment) 14

5.9.2. Discrimination..... 14

5.10. Gender Base Violence and Harassment..... 15

5.11. Donations and Sponsorships..... 15

5.12.	Political Aids and Political Attitudes	15
5.13.	Commercial Intermediaries	16
5.14.	Supplier Assessment	16
5.15.	Competition and Anti-Trust Rules.....	16
5.16.	Privacy and Protection of Personal Data	16
5.17.	Social Media Accounts	17
5.18.	Acting Honestly and Fairly in Relationships with Stakeholders	17
6.	COMPLIANCE RISK ANALYSIS (CRA)	17
6.1.	Fraport TAV Compliance Risk Analysis.....	17
6.2.	Compliance Risk Assessment Process.....	17
6.3.	Fraport AG and TAV Airports Risk Analysis.....	19
7.	COMPLIANCE MEASURES	19
7.1.	Programs	19
7.2.	Control System.....	20
7.3.	Compliance Guide.....	20
7.4.	Communication.....	20
7.5.	Training	21
7.6.	Ethical Code of Conduct Guides.....	22
7.7.	Third Party (Business Partners) Evaluation Guide	22
8.	NOTIFICATIONS TRANSACTIONS.....	22
8.1.	Reporting Compliance Violations.....	22
8.2.	BKMS* System Access and Notification.....	22
8.3.	Case Investigation, Research and Case Notification Management	23
8.3.1.	Conducting Investigation and Research	24
8.3.2.	Basic Principles in Investigation and Research	25
8.4.	Protection of Whistleblowers (Against Reprisals)	25
9.	COMPLIANCE REPORTING	26
9.1.	In-house Reporting	26
9.2.	Reporting to Fraport AG and TAV	26
10.	MONITORING AND IMPROVEMENT	26
11.	SANCTIONS.....	26
12.	CONTACT PERSON/S	26
13.	EXECUTION.....	27
14.	REVISION	27
15.	ENFORCEMENT	27

RELEVANT DOCUMENTS:

Document Control Procedure-8.46KY.1.1
Risk Assessment Procedure-8.46KY.1.8
Training Procedure-8.46IK.1.22
Disciplinary Procedure-8.46IK.1.26
Valuable Item and Negotiable Instrument Procedure-8.46MI.1:46
Lost and Found Item Operation Instructions-8.46NM.2.02
Third Party Due Diligence Guideline- 8.46.UTDK.6
Code of Ethical Conduct-Employees-8.46.CoC.6
Code of Ethical Conduct-Suppliers-8.46.CoC.6
3.rd Parties Compliance Notification-8.46.UTUT.6
Company Compliance Notification-8.46.CCN.6
Grievance Mechanism Procedure-8.46.KY.1.61
Compliant Notice-8.46.CoN.6

ATTACHMENTS:

1. Compliance Risk Analysis
2. Compliance Information Document (Non-Compliance List)
3. Report Form
4. Gift Declaration Form
5. Hospitality, Invitation, Gift List

FOREWORD

The corporate responsibilities of Fraport TAV Management include the establishment, operation and continuous monitoring of the Compliance Management System (CMS). This responsibility is defined by this guide on CMS. This guide is designed to cover the CMS requirements of Fraport AG and TAV and the national legal requirements, Fraport TAV internal procedures, values and ethical rules. This guide is periodically reviewed and updated as needed.

The legal basis for compliance should be evaluated in terms of international and national legislation.

International legislation:

▪ **German Anti-Bribery and Anti-Corruption Law** that entered into force on **06/24/2014** and relevant liabilities.

- Sect. 299 StGB
- Sect. 335a StGB
- Sect. 261 StGB
- Sect. 334, 335a StGB. (for travelers)

https://www.gesetze-im-internet.de/englisch_stgb/index.html

▪ **French Anti-corruption Law Sapin II**

<https://www.anticorruptionblog.com/compliance-program/new-french-anti-corruption-law-sapin-ii/>

▪ **FCPA - US Laws (Foreign Corrupt Practices Act of 1977)**

<https://www.justice.gov/sites/default/files/criminal-fraud/legacy/2012/11/14/fcpa-english.pdf>

▪ **UK Bribery Act**

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

National legislation

- Law on the declaration of property, anti-bribery and corruption
- Law on the prevention of laundering proceeds of crime
- Turkey Human Rights and Equality Institution Law
- Turkish Code of Commerce
- Capital Market Law
- The Turkish Criminal Code No. 5237 and some anti-corruption provisions are the legal grounds.
- 6698 Personal Data Protection Law

<http://www.mevzuat.gov.tr/Kanunlar.aspx>

This guide describes our basic compliance philosophy and the structure of and processes within the CMS.

1. PURPOSE, SCOPE

1.1. Purpose

The purpose of CMS is to protect the company, its managers and employees against financial losses, legal sanctions and losses of reputation.

To achieve this goal, a loop that consists of **preventing**, **detecting** and **reacting** to the violations that have been detected has been created. In this context, studies such as defining the duties and responsibilities, determination of risky situations for key processes, establishment of internal control mechanism and creation of reporting systematics are carried out.

1.2. Scope

Compliance means complying with the laws, company rules, ethical principles and policies. Compliance Management System is a goal for ensuring development and sustainability. It is also recognized as a systematic tool to prevent violations and the damage that these violations may cause to the company.

Compliance violations shall be handled within the scope of the rules described in this guide. Receiving and giving valuable gifts, accepting free travel, declaring luxury entertainment expenses, receiving and giving bribes, stealing and embezzlement, fraud, corruption, breaking the competition conditions, creating a monopoly in the market, damaging the property of the company, benefiting from the contract, actions and activities such as abuse of title, mobbing, all kinds of sexual behavior, discrimination, and conduct that do not comply with company codes of conduct are defined as compliance violation.

The rules in the Compliance Guideline are binding on all Fraport TAV employees and managers.

2. OUR VALUES

Fraport TAV core values are internalized by all employees and have become part of their way of doing business. Fraport TAV expects all employees to adhere to the core values of loyalty, reliability, fairness and customer centricity. We explain these basic values as follows:

Commitment: We value all our employees greatly. In turn, we expect our employees to act in line with company values and interests.

We do not behave negatively as this will damage the image of the company.

Reliability: We do not make promises we cannot keep, and the promises we make are our liability.

Fairness: Correct, impartial, equal and fair approach is our basic business understanding both in relations between employees and business partners.

Customer Centricity: It is one of our basic principles to approach internal and external customers sincerely, to anticipate and respond to their needs in advance and to keep customer satisfaction in the foreground in order to meet their needs and expectations.

3. CORPORATE CULTURE

Acting responsibly in accordance with our core values (loyalty, reliability, fairness, customer centricity) is one of the most fundamental and integral parts of Fraport TAV's corporate culture. We take responsibility for our actions. Our standards of conduct are based on applicable laws, our internal guidelines and our core ethical principles.

CMS has a "preventive" structure. The purpose of CMS practices is to inform employees to detect early compliance risks and violations and react appropriately.

The employees in our organization are not punished for their **mistakes**, preventative measures are taken for their **violations**. Action is taken for the **violations** made by both our employees and our suppliers. For the employees, Disciplinary Procedure is operated, or legal action is taken. For suppliers, the contract is terminated as an obvious violation of the contract has occurred, and the company is blacklisted.

We act with integrity at work and reflect our corporate culture to real life by establishing relations with our employees, customers, suppliers, public institutions and society on a fair basis. Likewise, we expect our business partners to act with honesty and in accordance with the law.

4. COMPLIANCE ORGANIZATION- DUTIES AND RESPONSIBILITIES

The establishment, development and accomplishing goals with effective implementation of the Compliance Management System at Fraport TAV shall be ensured through Senior Management and affiliated organizational structures. For this purpose, both establishment responsibilities and responsibilities within organizational structures have been determined.

4.1. Compliance Organization Chart

In order to establish, develop and effectively implement Compliance Management, Fraport TAV has established the organizational structure of CMS as shown in Figure 1. Within this organization, an LCO has been appointed, Boards and Committees have been determined. The duties and responsibilities of Fraport TAV Senior Management, Management and all employees within the organization have been defined.

This organizational chart also shows the way and places of communication to be made by LCO.

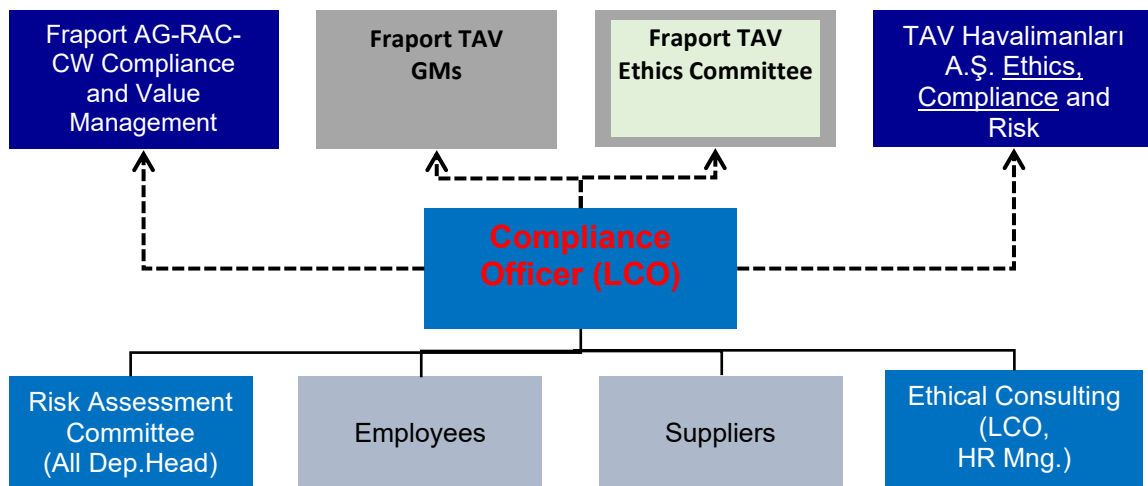


Figure 1. Fraport TAV Compliance Organization

4.2. Compliance Duties and Responsibilities

Duties and responsibilities are determined on behalf of the Compliance Management System, and Fraport TAV employees are committed to doing business in accordance with international and national

laws, internal procedures, ethical standards of conduct, and their core values of loyalty, reliability, fairness and customer centricity.

4.2.1. Fraport TAV Senior Management

Ensuring compliance is the duty of the Senior Management consisting of 2 General Managers. Therefore, it is the responsibility of the Senior Management to take all necessary precautions for the company and its employees to act in accordance with the laws.

The compliance duties of the Senior Management include;

- a) To continuously check whether the existing measures are appropriate in the light of legal and actual changes,
- b) To ensure that regular communication measures are taken in matters related to compliance,
- c) Reviewing the Compliance Management System (CMS) activity,
- d) To make sure that there are enough resources,
- a) Assigning and supporting the Compliance Officer (LCO).

Senior Management attaches importance to our values and ethical behavior and is aware of its responsibility as a role model. The values, attitudes and beliefs exhibited by the management shape the corporate culture.

4.2.2. Local Compliance Officer = LCO

The Compliance Officer, to be appointed by Fraport TAV Senior Management, is responsible for works such as the establishment, structuring, development, implementation and reporting of the compliance management system.

At Fraport TAV, Compliance Officer is specifically responsible for the following tasks:

- a) To support Senior Management in all CMS-related matters.
- b) To be a point of contact for all questions of management and employees regarding CMS,
- c) To conduct case studies on compliance, to ensure coordination with the audit team and/or the Ethics Committee,
- d) To coordinate and present the compliance training,
- e) To evaluate business partners (suppliers) in terms of ethical practices,
- f) To inform and support Fraport AG Chief Compliance Officer and TAV Chief Compliance Officer on compliance issues,
- g) To ensure that the compliance risk analysis (CRA) of the company is done and to participate in the CRA performed by Fraport AG RAC-CW Department and Corruption Risk Mapping study conducted by TAV Compliance team
- h) To report compliance-related events to Fraport AG's Compliance Department and TAV Ethics and Compliance Department in accordance with the provisions of this guide,
- i) To participate in training, meetings and other events organized by Fraport AG's Compliance Department and TAV Ethics and Compliance Department,

- j) To report situations related to the following issues directly to Fraport AG Compliance Officer and TAV Chief Compliance Officer;
- Material violations within the company.
 - Investigations and/or sanctions that directly affect or have the potential to affect Fraport TAV.
 - Notifications about the violation committed by the General Managers.

Compliance Officer is one of the most important chains in the compliance organization of main companies. Compliance Officer is in direct contact with Fraport AG's Compliance Department and TAV Chief Compliance Officer.

4.2.3. Compliance Boards and Committees

The duties and responsibilities of the boards and committees established within the compliance organization are set out below.

4.2.3.1. Ethical Consulting

It consists of LCO-Quality Manager, lawyer and HR Manager. Under the chairmanship of LCO, they meet on the spot at certain periods and/or upon meeting requests of the employees. Ethical Consulting always welcomes communication. etikdanismanlik@antalya-airport.aero

Ethical Consulting duties and responsibilities can be listed as follows:

- a) To support LCO in research, investigation and preliminary research regarding interviews,
- b) To respond to incoming consultancy requests within two (2) days at the latest,
- c) To communicate with the Law on legal matters,
- d) To support CMS Risk Analysis
- e) To work to enlighten employees about CMS and create development programs.

The basic principles of Ethical Consulting are as follows:

- a) They stand at an equal distance to all parties and events. They are discreet and can keep secrets
- b) They do not evaluate the events according to their perceptions and experiences, they do not express their personal opinions. They do not act biased.
- c) They are objective, neutral, work with concrete documents or information, and evaluate events. They do not have a favoritist and biased attitude.
- d) They do not provide any information to anyone other than the Ethics Committee Members and persons determined in this procedure in any way.
- e) They use plain and understandable expressions in verbal or written explanations, responses and interviews. To avoid errors or misunderstandings, they take the CMS Guide and case studies as reference.

Each department has duties and responsibilities in compliance with risk assessment and ethical rules. In addition, Quality, Law and Human Resources Departments have taken a special role in issues such as consultancy, training compliance improvement.

HR Department is a member of Ethical Consulting. It undertakes tasks such as planning and providing trainings, enforcing sanctions for violations of labor and employee law, handling conflict of interest issues, and preventing non-compliance issues such as **mobbing** and **discrimination**.

Law Department is a member of the Ethical Consulting. As LCO, he leads efforts to establish, effectively implement, and develop the Compliance Management System within the organization. He conducts audits for efficiency, makes observations, and prepares reports. He is responsible for providing advice on regulatory compliance, investigating and evaluating legally questionable situations, and other related tasks.

Quality department; Coordinates the preparation, updating, and publication of documents

4.2.3.2. Risk Assessment Committee

It consists of the participation of all Department Managers.

Its duties and responsibilities are:

- a) To identify risk areas and risk issues in the organization,
- b) To work to determine compliance threats and probabilities, to conduct risk analysis,
- c) To support monitoring of CMS risks,
- d) To inform LCO about the changing situation and conditions, to update the risk analysis in certain periods.

4.2.3.3. Ethics Committee

It consists of General Managers, LCO, Lawyer, HR Director and relevant Department Manager. The committee meets when necessary and with the invitation of LCO.

The duties and responsibilities of the Ethics Committee are:

- a) To enlighten the situations whose research and investigation have been completed by handling them and to resolve them,
- b) To ensure the establishment of values and standards of behavior that will be accepted by the Organization in all matters that are resolved,
- c) To conclude the issues submitted to it by the Committee within 1 month at the latest,
- d) To naturally lead its activities in order to expand the system,
- e) To monitor and supervise training activities.

4.2.4. Duties and Responsibilities of Employees

- a) To know and implement the CMS Policy,
- b) To know the Core Value and Ethical Conduct Standards and reflect them to the working environment,
- c) To request help, receive consultancy services in unstable or uncertain cases,
- d) To be sensitive to the behavior of other employees that are illegal or do not comply with Core Value and Ethical Conduct Standards,
- e) To advise and warn the colleagues who are in danger of violating the Core Value and Ethical Conduct Standards,

- f) To report those who violate Company Core Value and Ethical Conduct Standards by disclosing their identity or keeping it confidential via the **BKMS® Notification System**.

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=9icf36>

- g) To not make misleading accusations or notifications for hostility, revenge or personal reasons, to be aware that this will also constitute a crime,
- h) To support ethical investigations,
- i) To not discuss any aspect of an ethical investigation with others and to ensure confidentiality.

4.2.5. Duties and Responsibilities of Managers

- a) To be an example and to lead other employees with their behavior,
- b) To completely implement CMS within its own organizational structures,
- c) To ensure that all employees understand and apply Fraport TAV Values and Ethical Behavior Standards,
- d) To ensure that all employees participate in meetings and trainings to be held within the scope of CMS,
- e) To protect the workplace environment that will encourage its employees to express their detections or thoughts about the applications without any fear / reservations,
- f) To give support when it comes to ethical investigations,
- g) To ensure that new employees are fully informed about Fraport TAV Core Values and Standards of Conduct before they are hired.

4.2.6. Corporate Duties and Responsibilities

- a) To create and support a Powerful and Functioning Compliance Management System,
- b) To develop procedures showing Organizational Culture, Core Value and Conduct Standards,
- c) To ensure the realization and delivery of all kinds of training programs to develop CMS,
- d) To investigate violation notifications regarding the Core Value and Ethical Conduct Standards procedures,
- e) To establish and maintain working conditions that support employee responsibilities,
- f) To provide employees with the opportunity to receive information and notify about CMS,
- g) To protect well-intentioned employees who report real or suspicious ethical violations,
- h) To protect privacy.

4.2.7. Fraport AG and TAV Compliance Reporting Responsibilities

Fraport Group's Compliance Officer and Fraport AG's Compliance Department are the central point of contact within the Group. These structures perform the tasks specified in "F8.2 Group Compliance Management System Guide (CMS)". TAV Airports Internal Audit Compliance and Risk Department is responsible for the Compliance activities within the TAV structure.

6-month reports by LCO and non-compliance notifications are made to Fraport AG Compliance Department and TAV Airports Internal Audit Compliance and Risk Department.

Except for regular reporting, in the event of a violation that requires non-compliance reporting or in cases where there is a possibility of violation, when there is a material violation in the amount of 50,000 EUR, a significant loss of brand value or a possible loss of brand value, a report is made to the General Managers, Fraport AG and TAV. In addition, LCO reports directly to Fraport AG and TAV when there is a violation or potential violation regarding the General Managers.

If the General Managers see any risk of non-compliance and/or violation of the code of ethics, they may request from LCO to investigate the relevant process, person or situation. LCO conducts the process in case of incident investigation flow and presents the report that has prepared to the General Managers.

Ref: Article 9. for reporting detail

5. FRAPORT TAV ETHICS PRINCIPLES AND POLICIES

Fraport TAV expects all management and employees to comply with the adopted rules of corporate conduct. These are the basic principles of compliance with the law, on the basis of respect for human rights, fight against bribery, corruption, laundering of proceeds of crime, prevention of financing of terrorism, taking measures against persons with corporate population, and complying with all kinds of sanctions and restrictions to be determined nationally and internationally.

For more detail information and company commitments ref: FTA HR Policy, CoC-Employees- 8.46CoCe.6 and CoC-Suppliers Guidelines-8.46CoCs.6.

5.1. Compliance With Law

We act in accordance with the law in all our business activities and business relationships, and in cases where the legislation is unclear, we act in accordance with our Ethical Principles and by consulting the competent authorities when necessary.

We record all our commercial activities and records completely and clearly in accordance with the applicable legislation, and we ensure that agreements made with third parties are clear and understandable, in accordance with the legislation, our Ethical Principles and policies.

5.2. Respect For Human Rights

We accept the United Nations Declaration of Human Rights and ensure that our Code of Ethics and relevant policies are compatible with these principles. We take great care to treat all our employees equally and be fair, and we expect the same attitude from all our stakeholders.

For more detail information and company commitments ref: FTA HR Policy, CoC-Employees- 8.46CoCe.6 and CoC-Suppliers Guidelines-8.46CoCs.6.

National and international legal legislation regarding respect for Human Rights is as follows:

- T.R. Constitution,
- Turkish Human Rights and Equality Institution Law No. 6701,
- UN Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, UN Convention on the Rights of Persons with Disabilities and the Convention on the Rights of the Child,
- ILO (International Labor Organization) Conventions to which our country is a party,
- United Nations Guiding Principles on Business and Human Rights,

- United Nations Global Compacts,
- OECD (Organization for Economic Co-operation and Development) Principles for Multinational Companies

5.3. Conflicts of Interest

As Fraport TAV employees, in the decisions we make according to our roles and responsibilities, we take care not to be in any situation that may prevent us from being impartial, that may benefit ourselves or our relatives or create this impression, or where our personal interests may conflict with our responsibilities towards the Company.

If we are in a situation that can be considered as a conflict of interest, we avoid the harm that this situation may cause to us and our company by sharing the issue with our managers and the department or officer responsible for compliance (LCO).

We always avoid personal benefit. Personal benefit; is the benefit that the employee provides privately to himself, which is contrary to the benefit of the company. Personal benefit can be obtained directly or indirectly through friends, family members up to third degree or companies owned by them. Personal benefits; economic, financial, political, professional, sectarian, emotional etc, can happen in different situations.

Conflict of Interest Guideline (ref: 8.46Col.6) has been prepared and published for ensure more detailed information about the issue.

5.4. Receiving and Giving Valuable Gifts, Invitation and Hospitality Rules

Fraport TAV employees cannot receive or give gifts above the defined value, nor can they invite, accept or hospitality.

Under this heading, the rules of giving and receiving gifts, inviting, accepting invitations and hosting are handled in two separate sections. In this context, what can be accepted as gifts and hospitality, what the scope of the invitation can be, what are the necessary documents and approvals in this process, what should be done if there is a concern are discussed.

Gift, Invitation and Hospitality Guideline (ref: 8.46GIH.6) has been prepared and published for ensure more detailed information about the issue.

5.5. Bribery, Corruption, Theft, and Other Shameful Situations

Bribery is to make any offer, to pay, to make a commitment, or to give or receive anything valuable in order to influence an official's decision, directly or indirectly. It is strictly forbidden to offer or take a bribe in order to gain an unfair business or contract.

Corruption, corruption as a concept, is abuse of a duty, an authority, doing business against the law, rule, or method.

Within the establishment, bribery, corruption, theft, and other cases against codes of conduct is never tolerated, requiring immediate Disciplinary Procedures or legal processes to be initiated where necessary.

It is the duty and responsibility of all employees to notify such events or suspicions via the **Notification System** (BKMS) or immediately report it to their manager, Compliance Officer or Ethical Consulting.

5.6. Economic Sanctions and Money Laundering

As Fraport TAV, ensure that comply with the regulations regarding **economic sanctions** and export controls in an effective and efficient manner. We take the necessary precautions. In this context, we do not establish commercial relations with people on the embargo and sanction lists, and if there is a necessity to establish direct or indirect contact, we always obtain approval from Fraport TAV Legal and Compliance Consultancy before contact is established.

The process of integrating income obtained through illegitimate means into the financial system in order to show it as if it was earned through legitimate means is called money laundering. As Fraport TAV, in compliance with national and international legislation, we avoid any commercial transaction that may be seen as laundering of proceeds of crime, therefore, before entering into a business relationship with third parties, we make the necessary situation assessment to get to know the relevant party. As Fraport TAV, we do not enter into business relationships with third parties about whom we do not have sufficient information or about whom we have negative intelligence, who pose a risk or raise suspicion for these and similar reasons.

5.7. Facilitation Payments (Small payment to Corporate-Establishment employees)

These are small, out-of-the-box cash payments made directly or indirectly to a public institution and/or private establishment official at any level, in order to speed up the functioning of a routine administrative process, to seek convenience or to afford them advantage. Fraport TAV employees cannot make or accept such payments.

5.8. Second Job Statement

Fraport TAV employees first acknowledge that their duty at Fraport TAV is their main business. Every employee has the right to a second job, but must make a second job statement. Personnel who want to work in a second job has to apply **to their senior manager** with a Second Job Declaration Compliance Form containing detailed information on the subject, obtain a permit and submit it to the approval of the General Manager.

The criteria to be considered in approving the second job declaration are as follows:

- a) Compliance of the second job to the working system,
- b) The current performance of the employee,
- c) Direct or indirect relationship of the job with competing companies,
- d) Ensuring absolute confidentiality of company information,
- e) Besides the social, communal and economic benefits of the second job, the contribution to the company brand value is evaluated.

The manager reviews the request and allows the employee to do the second job if he/she is of the opinion that it will not adversely affect the employee's performance at Fraport TAV.

After the acceptance of the second job declaration, the employee signs the "Additional Job Declaration and Commitment" and delivers it to the Human Resources Department. By submitting the Human Resources Additional Job Declaration and Commitment to the approval of the General Manager, the employee completes the second job permit process.

If the Fraport TAV employee is working in any non-governmental organization voluntarily and without being paid in any way, this second job is not evaluated and considered as a supported social responsibility work.

5.9. Psychological Harassment and Discrimination

5.9.1. Mobbing (Psychological Harassment)

The concept is derived from “*mobile vulgus*” in Latin. It means psychological harassment that leads to huge financial and emotional damage in business life. Actions (written and verbal) that are repeated and intended to undermine the working conditions of another person and thus to harm one's professional development, reputation, mental or physical health rights.

Mobbing is an emotional attack manifested systematically as psychological violence, oppression, harassment, humiliation, threats, etc. by abusing existing power or positional title.

In order to look at a case as psychological *harassment*, the behaviors must be repeated several times a month, have passed in a series of phases one after another and continue for a long time, and their behavior must be in the form of ill-treatment.

In order to detect mobbing, whether it carries the **intentionality**, **continuity** and **systematicity** qualities, whether it poses an obstacle for the responsibilities within the duty to be performed and the period of the harassment have to be assessed. Mobbing starts with the person being the target of disrespect and rude behavior, and it manifests in the form of forcing the person to quit by creating an aggressive environment that aims to lower one's social reputation.

The following symptoms of the person exposed to mobbing may be observed:

- a) Low performance and productivity due to low professional motivation
- b) Communication conflicts with employees
- c) Sense of burnout
- d) Lack of desire to go to work
- e) Conflicting feelings like regret and ambition to work
- f) Indifference to corporate issues=silence
- g) The desire to change the business and work environment
- h) Feeling insecure about work.

Fraport TAV Management is aware of the damages that mobbing, which causes these negativities, can cause to the company and does not allow mobbing within the organization in any way. It is known that Disciplinary Procedure will be initiated if mobbing is detected.

5.9.2. Discrimination

At Fraport TAV, discrimination cannot be made for reasons such as race, skin color, national and/or social origin, language, gender, age, religion, sect and/or worldview, political opinion, membership in any worker organization, disability, and sexual orientation. In case of discrimination, Disciplinary Procedure is executed besides legal conditions.

5.10. Gender Base Violence and Harassment

No gender-based discrimination can be made among Fraport TAV employees. Employees may not engage in any behavior that can be regarded as simple harassment, gender-based harassment, molestation or gender-based assault against each other in the workplace. Gender-based harassment includes non-consensual, sexually explicit words, attitudes or other forms of behavior that are made without body contact with the person.

Employees cannot send sexual messages to each other through social media or other media, even outside working hours, and cannot broadcast sexual content in written or visual media. Notifications made in this context are subject to the LCO investigation and are evaluated within the scope of the Disciplinary Procedure in the Ethics Committee.

5.11. Donations and Sponsorships

We carry out donation and sponsorship processes in a transparent manner and take care that these activities do not conflict with the Fraport TAV's values or commercial interests. For any activities that violate human and animal rights, encourage tobacco, alcohol and drugs, or harm nature.

We do not donate to or sponsor the activities of organizations that discriminate on the basis of gender, language, religion, race, color, age, sex, nationality or difference of opinion. We do not donate to political parties.

Donation includes material or intangible payments to non-profit organizations such as public institutions, foundations and associations, in particular, without expecting commercial interests. Unlike any commercial activity, Fraport TAV does not seek profit when it makes a donation. The sole purpose of such actions is to contribute to local development and help communities.

Sponsorship is to support individuals or organizations with money, equipment or service in the fields of sports, arts, culture and social activities in order to achieve corporate goals. Fraport TAV provides these supports within the scope of social responsibility and does not expect any interest.

Donation and sponsorship amounts are approved by BoD with the proposal of the General Manager.

5.12. Political Aids and Political Attitudes

Any cash or non-cash benefits to any political party, a politician or a candidate politician, for an election campaign, an elected official or any affiliate institution are within the scope of political aid. The aids listed below cannot be provided by Fraport TAV.

Monetary items: Cash, check, precious metals and stones, investment funds, etc.

Non-monetary items: Food, beverage, institutional resources (Ex: office supplies, printing services, furniture and equipment, physical assistance, corporate buildings) etc.

If any concerns arise regarding the support of political parties during the realization of the activities, Fraport TAV forwards it to Fraport AG Ethical Management and TAV Airports Chief Ethics Auditor.

Fraport TAV employees may not engage in political discussions, have political posters, political party emblems, or make political propaganda in the workplace. Political thought and political party membership are personal preferences and cannot be considered within the scope of compatibility unless the issues listed in this paragraph are violated.

If Fraport TAV has any concerns about providing support to political parties during the performance of its activities, it is reported to Fraport AG Ethics Management and TAV Airports Chief Auditor of Ethics.

5.13. Commercial Intermediaries

These are the intermediary institutions used to expand or develop the relationship networks of the organization, to provide business intelligence and to create new business opportunities. Commercial intermediaries providing service for a certain commission act on behalf of Fraport TAV. Fraport TAV is bound for the compliance of commercial intermediaries with ethical principles and laws. A detailed contract must be made regarding the service to be received. All the rules to be followed and the code of ethics-supplier guide must be part of the contract. Payments to be made for the services provided to these institutions should be made only through the bank. Fraport TAV does not receive commercial intermediary services from individuals.

Fraport TAV can obtain commercial intermediation services from individuals with the knowledge and approval of the General Managers. Payments to these persons should also be made through the bank.

5.14. Supplier Assessment

At Fraport TAV, suppliers are selected according to certain criteria. Contracts are signed with suppliers for the works determined in the Purchasing Procedure. Suppliers have to accept and apply Fraport TAV Ethical Values, otherwise, no contract is made, and the contract is terminated when it is determined that they act against the Ethical Behavior. Accordingly, compliance with laws and ethical rules is carefully monitored. " Ethical Code of Conduct" is provided as a guide and it should be stated in the contract.

5.15. Competition and Anti-Trust Rules

Fraport TAV respects all applicable national and international antitrust laws and regulations, and competition law. It avoids anti-competitive provisions in commercial relations and contracts it establishes.

Competition law prohibits "horizontal" or "vertical" confidential agreements between two or more companies in a market that have the purpose or effect of preventing, limiting or distorting competition.

All types of agreements (written, verbal, etc.) that have an anti-competitive purpose or effect are not only prohibited but also null.

All businesses comply with the competition law. Otherwise, the legal person of the company and the people involved in the decision-making process can be seriously damaged.

5.16. Privacy and Protection of Personal Data

We know that it is prohibited to use or share personal, commercial, financial, technical, legal and/or similar confidential information belonging to our Company, our employees or our Business Partners for our own or third parties' benefit, and we take the necessary measures to protect the confidential information we know about in accordance with our roles and responsibilities. We use the information only for the work that we are obliged to do in accordance with our job description. We comply with the relevant legislation and contractual obligations in sharing trade secrets and other confidential information.

We avoid engaging in any business or transaction that could result in fraud or information abuse. We protect the confidential information we obtain and do not share it with third parties, even if we leave the Community.

For more detail information ref. is Personal Data Protection Procedures and 6698 Law.

5.17. Social Media Accounts

As Fraport TAV, we continue to take part in social media, which has a strong growth trend in the world and in Türkiye, especially for the brand value. We know that personal social media accounts are everyone's private spaces and we respect their sharing preferences. On the other hand, in addition to the benefits that can be obtained from the correct use of social media, we are also aware of the significant reputational risks it may bring to our Community. For this reason, when sharing on social media, we avoid sharing content that would cause disagreements and uncertainties on corporate issues, as well as information and photographs that would violate the confidentiality rules of companies. We always ensure that we comply with legal regulations, Fraport TAV Ethical Principles and related policies in our social media posts. *Ref: Article 5.11 for gender based messages in social media.*

5.18. Acting Honestly and Fairly in Relationships with Stakeholders

We expect all our stakeholders to comply with relevant laws and regulations at all times.

We use always objective criteria in our selection of suppliers and subcontractors take care to have business relations with parties that attach importance to human rights, take into account the principles of anti-bribery and anti-corruption, and fulfill their legal obligations.

We keep our communication channels with our stakeholders open and always take their complaints and suggestions into consideration to evaluate and feedback to them.

We always provide honest and reliable information to the public and the media. We do not make statements that conflict with the ethical values of the Fraport TAV in press releases and social media.

As Fraport TAV Management, we manage our company with an understanding of efficiency and effectiveness for sustainable growth purposes.

6. COMPLIANCE RISK ANALYSIS (CRA)

6.1. Fraport TAV Compliance Risk Analysis

Systematic identification of compliance risks is the basis for developing and prioritizing our compliance program. Taking appropriate measures and implementing them helps reduce risks to an acceptable level. The purpose here is to minimize the risks imposing responsibility on our company, management and each employee.

Compliance Risk Analysis (CRA) is performed at Fraport TAV and is updated at least once a year. The purpose of updating the CRA every year is to make sure that the necessary measures are taken and implemented to minimize the risk. How organizational and regulatory developments affect compliance risks are definitely taken into consideration.

6.2. Compliance Risk Assessment Process

Risk analysis and assessment in the organization are explained in the Risk Assessment Procedure depending on the type of risk (occupational health and safety, environment, safety management risks, financial risks...). Compliance management risk analysis process is described here.

a) Determining the Process: First, the risk assessment method is determined. At the same time, taking into account the actual data, targets are set, possible new risks are determined, responsibilities and related functions are defined, discussions and brainstorming are carried out for the timetable and subsequent actions. Risk points are determined on the basis of the relevant departments by filling in the *Risk Question List* prepared at this stage (Annex. 1)

b) Identifying the Risk: Principles, techniques and practices are determined in this stage. The answer is sought by asking the following questions. "Why is there corruption in our company?" and "How can corruption occur in our company? After answering these questions, anti-corruption tools and special preventive processes are defined.

c) Evaluating Risks: Fraport TAV identifies the probability and potential impact of risks of corruption to allocate resources efficiently and effectively. In this regard, the risks of corruption are logically prioritized based on a combination of probabilities of occurrence and potential impacts.

d) Determination of Risk-Mitigating Measures: Identification of risk-mitigating measures, control criteria, rating scale and data collection mechanisms are defined.

Determining the current situation in the development of risk reducing measures and predictive control methods can greatly reduce the risks of corruption and non-compliance.

e) Calculating Residual Risk: After rating the internal controls that reduce the risk of corruption, the next step is to determine the level of the remaining (residual) risk.

Residual risk is the degree of risk remaining after taking the risk-mitigating effect of the measures taken. Risk is now a factor of natural risk and control measures. Despite anti-corruption programs, the risk of corruption may be possible. As a result, normally there is some residual risk for each corruption plan.

After determining the determined risk and control risk rating points in the scale used, the remaining risk can be calculated as the natural risk multiplied by the control risk. Point ranges will need to be assigned to determine whether residual risk rates are within tolerance limits (See RMG). The remaining risk rate should be lower than the risk acceptance limit (tolerance value). This is because every control should reduce risks. Otherwise, control activities should be revised.

Severity	RISK RATING TABLE				
Probability	Very low (1)	Low (2)	Moderate (3)	High (4)	Very high (5)
Very low (1)	(1) No Action	(2) Tolerable	(3) Tolerable	(4) Tolerable	(5) Tolerable
Low(2)	(2) Tolerable	(4) Tolerable	(6) Tolerable	(8) Moderate	(10) Moderate
Moderate (3)	(3) Tolerable	(6) Moderate	(9) Moderate	(12) Moderate	(15) Substantial
High (4)	(4) Tolerable	(8) Moderate	(12) Moderate	(16) Substantial	(20) Substantial
Very high (5)	(5) Tolerable	(10) Moderate	(15) Substantial	(20) Substantial	(25) Intolerable

Table 1: Risk rating table (ref: RMG)

To calculate the risk rate, the possibility of **being a risk** is multiplied with the **impact degree of risk**. Table 2. was prepared to be used in risk assessment calculation. In the Table in question, 5 scales indicate quantitative and qualitative values. The scale values used are listed as follows;

1 = Very low risk, "**No Action**",

2 = Low risk, "**Tolerable**",

3 = Moderate, "**Moderate**" action is required,

4 = high risk, "**Important**"

5 = very high risk "**Intolerable**". (See Risk Management Guide (RMG).

Very Low-Low risk: The remaining risk being very low and low means that the measures implemented are effective and reduce the risk of corruption, no action is taken.

Moderate risk: The remaining risk being moderate means that a high risk of corruption is partially mitigated by the measures taken and it is at a tolerable level.

High-Very High risk: The remaining risk being high means that the high risk of corruption cannot be significantly mitigated by the measures taken and leaves the company at risk, which can seriously affect the company. The very high risk is the intolerable risk and the activity must be stopped.

h) Making an Action Plan: The key determinant of the action plan is an approved level of risk tolerance. It is necessary to take measures to reduce the risk tolerance level greater than the risk tolerance determined and approved by the management to the risk tolerance level. A corruption risk response plan is needed for this.

Some of the features of the action plan may include:

- Disclosure of each action item,
- Responsibilities and timelines for each action item,
- Estimating the required financial and human resources.

6.3. Fraport AG and TAV Airports Risk Analysis

Fraport TAV actively participates in the Fraport AG Group Compliance Risk Analysis study (CRA) and the annual Corruption Risk Matrix (CRM) study conducted by TAV Airports. When making CMS risk analysis, the findings and information from Fraport Group CRA and TAV Airports CRM study is taken into account.

7. COMPLIANCE MEASURES

7.1. Programs

Within the scope of compliance programs, programs addressing certain measures are prepared to minimize risks and respond appropriately to possible violations, determine the code of conduct, improve training and communication, and continuously monitor and develop the CMS.

Especially the measures to prevent violations are included in the programs. Applications determined to improve CMS are shown in **Table 2**.

CMS Development Applications		
Prevent	Detect	React
CMS Risk Analysis	BKMS	Deep Investigation
Culture, ethical values and policy	Management Notification	Sanctions Consistent sanction
Senior Management Support	e-mail, complaint forms and phone notification	Constant internal and external communication
CMS Training-communication	Investigation Procedure	Constant improvement
Help Desk-Ethical Consulting	Audit, Internal Control Systems	
Promotion and supports	Reporting&Surveillance	

Table 2: CMS Development Applications

7.2. Control System

Audit, surveillance and reporting systems are actively used in Fraport TAV to ensure compliance between mandatory compliance measures. The controls are regularly reviewed to measure their effectiveness. Employees and suppliers are checked within the scope of compliance policies and targets, and the methodology to be applied for the identified non-compliance cases is determined.

7.3. Compliance Guide

In order for the Compliance Management to be implemented effectively, issues such as clear determination of rules, risk analysis, violation or how to assess the misuse of powers should be clearly described.

The Compliance Guide prepared for this purpose provides information about the rules of conduct and practices in line with company policies. The guide is updated when needed and in certain periods under the coordination of LCO, published on the intranet, accessible to all users.

Based on the risk-oriented compliance strategy, Fraport TAV has adopted the following guidelines, together with the Guide:

- Code of Conducts For Employees-For Suppliers
- Third Parties Due Diligence Guide
- CMS Risk Analysis
- Internal Procedures and Guidelines
- Regulations regarding the Personal Data Protection Law.

These guidelines are published on the Intranet so that all employees can easily access them. Moreover, the Code of Conduct for Employees is offered to all employees in print and to suppliers as a supplement to each contract.

7.4. Communication

With the Fraport TAV corporate communication approach, Senior Management is in communication with all employees and suppliers.

The Code of Ethical Conduct is a formal communication document with employees and suppliers. Table 3 describes the communication configuration. Various meetings, info boards, intranet announcements and trainings are used as effective communication methods. Ethical Consulting and BKMS System, direct communication with LCO

Form of Communication	Concerned	Frequency	Responsible
Policy and Corporate values announcement	All personnel	Once	LCO
Codes of Conduct	All Employees	Once	HR
Codes of Conduct -Stated in each contract	Suppliers	Contract-based	Purchasing, Com. Mark., Adm. Works
Meetings, minutes	All Personnel	After meeting	LCO
Employee notifications,	All managers	As needed	LCO
Intranet announcements, e-mail, info boards, newspaper, complaint forms	All Personnel	As needed	LCO
BKMS system notifications	-	Per case	HR, LCO

Table 3: Communication Structure

are structured communication methods. All documents prepared in Fraport TAV and training programs implemented are also important corporate communication methods.

7.5. Training

Trainings are organized to ensure that all employees understand and mind compliance-related rules. The training is planned by the HR department in accordance with the Training Procedure. Table 5 demonstrate training plan. CMS training is mandatory for all managers and employees at Fraport TAV

Target group	Training type	Frequency	Responsible	Date
Managers	CMS General Training	Once in 2 years	LCO, HR	Annual Training Plan
All Employees	Refreshment-Codes of Conduct	Once in 2 years	Dept. Mng., HR+LCO	Annual Training Plan
Seasonal employees	Codes of Conduct	As needed	ISG+HR	Season start
All Employees + Seasonal	e-learning VMS (value management)	Once	HR	Constantly
1. Trd & Mark. 2. Purchasing 3. Technical	1. Risk analysis 2. Purchasing procedure 3. Tender instruction 4. Contract instruction 5. Supplier meetings	Once As needed	LCO+Lawyer+HR	Constantly
Suppliers-Management	Codes of Conduct-Supplier	As needed	LCO+HR+ Salin alma	Constantly

Table 4 Training Plan

without exception. It is also compulsory for those who work temporarily and interns. The training in question is given face-to-face in class or online order by LCO. Furthermore, it is also provided on the Intranet as “e-learning” to complete the refresher training and ensure continuous access.

Training participant documents are issued and recorded by the HR Department.

If Fraport AG's Compliance Department and TAV Airports Compliance Department deems a particular training measure necessary, Fraport TAV management staff or Compliance Officer supports this and helps identify the target group and provide training.

The content of the training in question varies according to the existing laws and internal rules, and is within the following scope. Videos about exemplary codes of conduct are included in order to ensure educational effectiveness.

- CMS Training purpose
- Definitions and Abbreviations
- Compliance Management System (CMS)
- CMS Organization, duties and responsibilities
- Code of Conduct (CoC)-employees-suppliers
- Some incompliances that may disrupt ethical behavior
- CMS Risk Analysis
- Education-Communication
- Reporting
- CMS Documentation
- Videos of case studies

7.6. Ethical Code of Conduct Guides

Fraport TAV clearly defines the rules of ethical behavior and commits to abide by the ethical rules it has determined. It announces the committed rules to all employees and business partners and provides consultancy when necessary. For this purpose, an Ethical Code of Conduct Guide is prepared for employees and published on the internet and intranet for easy access. This document explains the compliance policy, framework, corporate responsibilities, responsibilities as a workplace, employee rights and responsibilities, and employee support programs implemented. All employees and business partners are expected to abide by the code of ethical conduct.

7.7. Third Party (Business Partners) Evaluation Guide

All outsourced service suppliers, procurement suppliers, temporary business suppliers, contracted organizations for commercial purposes and business partners with financial relations with Fraport TAV within the scope of Compliance and Code of Ethical Conduct principles are evaluated. The Code of Ethical Conduct covers national and international anti-corruption and fraud legislation, company policies and procedures. For this purpose, the Third Party Due Diligence Guide, which describes the evaluation principles and rules, has been prepared. Evaluation areas, third party evaluation system, information gathering, risk assessment process, taking risk preventive measures, roles and responsibilities, legal basis, auditing, documentation and reporting are explained.

Fraport TAV attaches great importance to honesty in its relations with its business partners and expects the same behavior from the business partners. It does not make a contract with suppliers that do not comply with the terms, and if it is made, it can be terminated. All third parties that will make a contract with the company must also sign the "Anti-Corruption Statement" published on the internet.

8. NOTIFICATIONS TRANSACTIONS

8.1. Reporting Compliance Violations

Acceptance and handling of notices of compliance violations is essential to ensure the effectiveness of the CMS. Suspicious cases are definitely investigated, and weaknesses related to the process are removed by immediately eliminating any misconducts that are detected.

Each employee is responsible for immediately reporting any detections of violations of the laws, company guidelines and ethical behaviors specified in this guide or their potential violations. It is ensured by the Senior Management that no employee will be subject to any sanctions due to the notifications they will make in the light of information and findings.

As a basic principle, Fraport TAV employees should first contact a senior manager *or the Compliance Officer* to make such notifications. If both contact points are not preferred by the employee, he/she can apply to the Ethics Committee or they can notify directly with their names disclosed or anonymously through the "BKMS" reporting system.

8.2. BKMS* System Access and Notification

All employees, suppliers, customers and other business partners of Fraport TAV can use the **electronic reporting system** (BKMS®) 24 hours a day, 7 days a week, anywhere in the world. In addition, Fraport TAV employees can contact **Fraport AG** Ombudsperson regarding serious legal violations via the link.

www.ombudsfrau-parsch.de

Likewise, notifications can be made to **TAV Airports Compliance and Risk Department** via entering the Corporate Code +90 212 900 34 54/ 5313 or to ADP Center via the link.

<https://report.whistleb.com/fr/adp>

The identity of the notifiers is never disclosed and there is no financial burden to contact the ombudsman.

Likewise, Fraport TAV has established an independent electronic notification system for notifying and reporting compliance violations, and has made it accessible in Turkish and English languages to users who are in contact with our company such as company employees, business partners and travelers. Through this system, notification can be made with or without disclosing the identity and it is ensured that the identity is not accessible. In the event of a legal process, the information can be given to the legal authority, the person reporting the notification may need to be called as a witness.

For Fraport TAV BKMS* system notification;

a) It can only be accessed from within the company under the “CORPORATE” tab.

<http://www.ayt.net/int2/default.asp>

b) Both internal and external access is possible via the link below.

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=9icf36>

8.3. Case Investigation, Research and Case Notification Management

In a first step, an initial assessment is carried out to check whether the reported breach falls within the material scope of the Grievance Mechanism Procedure and Compliance Management System Guideline (CMS). If the notification or complaint is within the scope of CMS issues, the Compliance Manager handles it directly in coordination with Human Resources Department Assistant Manager (HR Ast. Mngr).

When a notification of Violation of laws, internal procedures, and ethical rules are received or a potential suspicion arises, the case investigation process is initiated by the LCO and the process is carried out by the LCO from start to finish.

The process is operated as stated in Table 4 Case Investigation Flow Chart. LCO initiates the process by discussing with the relevant party for the investigation.

LCO-HR is responsible for the conclusion of the notification submitted in BKMS or in any way in writing, and for the feedback to the owner of the notification.

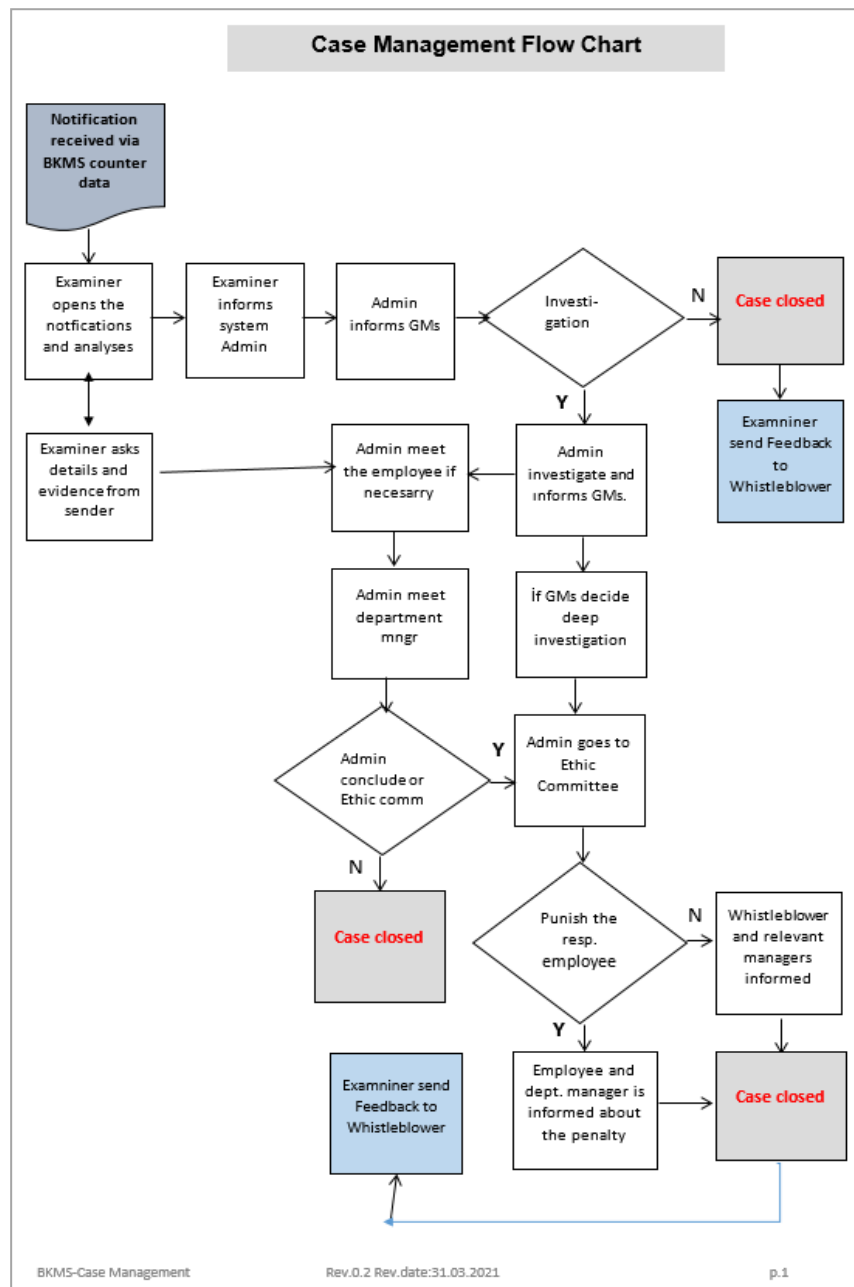
If the notification is related to Fraport TAV Senior Management, LCO initiates the investigation by directly informing Fraport AG Compliance Manager and TAV Internal Audit, Risk and Compliance Department without making any comment. The investigation is carried out in close cooperation with the Board Members.

LCO can request support from Fraport AG and TAV Internal Audit, Risk and Compliance Department whenever needed during the investigation process it carries out.

In compliance violations handled by the Central Compliance Department, all relevant information and documents are provided by LCO. There is a **confidentiality agreement** between Fraport TAV and Fraport AG to protect the confidentiality of information and documents and the conversations with employees. The same confidentiality agreement will be made with TAV Airports.

Basic principles in investigation and research:

- The interviewed persons, the scope of the event, the results of the event are carried out with a strict confidentiality principle.
- Reaching the highest possible level of objective data / information should be tried. The matter should not be announced in any way without being clarified.
- Interviews with managers and individuals are written down by issuing a minute and they should be signed.
- The relevance of the legal situation is definitely investigated in terms of the results of the case.
- If there is a legal situation, Legal Processes are initiated.
- The owner of the notification is informed in any case.



The current KVKK (Personal Data Protection Law) provisions should be taken into account during the German Federal Data Protection Act (BDSG) case investigation and information acquisition period.

8.3.1. Conducting Investigation and Research

The management ensures that all authorizations required to clarify the facts of the case are made available to the investigators without delay.

The First action, the event is clearly defined. Relevant parties are identified, the relevant manager is contacted and informed, witnesses are determined if necessary but it is essential to include as few

people as possible in the research. In the research, sequential operations are carried out by following the work flow chart. All documents within the scope of the incident are examined and face-to-face interviews are held. LCO can evaluate the case with Ethics Consultants and present it to the Ethics Committee when deemed necessary. As a result of the Ethics Committee evaluation, the HR process begins. This process is described in the Disciplinary Procedure.

After these investigations, issues such as what situations were observed, what the statements of the people interviewed were, and what will be included in the final report are determined.

If the breach is related to business partners or suppliers, LCO will investigate in with suppliers authorized persons.

8.3.2. Basic Principles in Investigation and Research

- a) The interviewees, the scope of the event, the results of the event are carried out in complete confidentiality.
- b) The highest level of objective data/information should be attained as much as possible. It should not be announced in any aspect without clarification of the subject.
- c) Interviews with directors and individuals should be written down and signed.
- d) The relevance of the legal situation in terms of the consequences of the incident is absolutely investigated.
- e) If there is a legal situation, the Legal Actions process is initiated.
- f) In principle, the incident investigation process is completed within 1 month; if necessary, the time can be extended. In any case, a report is prepared and submitted to the General Managers/ Complaint Department.

The provisions of the applicable Personal Data Protection Law (KVKK) should be taken into account in the event investigation and information process of the German Federal Data Protection Act (BDSG).

8.4. Protection of Whistleblowers (Against Reprisals)

At Fraport TAV, special protection is given to whistleblowers who pass on information in good faith in order to expose irregularities. The Compliance Department guarantees that they are protected by maximum confidentiality and whenever legally possible, by ensuring their anonymity.

In terms of case management at Fraport TAV, identity of the whistleblower is disclosed solely to the persons who are responsible for receiving information or for instituting follow-up actions.

Fraport TAV ensures that whistleblowers who want to send information to the reporting system are not blocked, restricted or affected while sending the information.

Whistleblowers who have identified by name need not fear any reprisals, such as suspension, termination, relocation to other duties, disciplinary measures, discrimination, bullying or similar retaliation, from their Fraport TAV Management after they have submitted a report.

Reports made with malicious intent to influence employees are definitely not accept. Information that clearly aims to harm, blame or humiliate others, or that disrespects moral rules and personal rights will not be processed. The whistleblower will not provide with special protection against reprisals and may be subject to liability in these cases.

9. COMPLIANCE REPORTING

9.1. In-house Reporting

The compliance officer reports to the Senior Management every six months about the status of the CMS and compliance issues. HR, Law and other relevant departments deliver the necessary information to LCO for regular internal reporting. LCO meets with Senior Management at least **once/twice** each year and evaluates the CMS.

The minimum required subjects in the incident investigation report are defined. The said reports are destroyed by the cutter after 3 years of storage.

Information to be included in the report:

Report number/year, incident number, date of notification, form of notification, text version of the notification, brief description of the incident, how the report was carried out, risk assessment, people to whom the report would be shared, interviewees, statements given, list of relevant documents, result evaluation, preventive measures to be taken, the person who prepared it, date and place information are included. The report should also be evaluated in terms of KVKK (Personal Data protection Law).

9.2. Reporting to Fraport AG and TAV

Fraport TAV reports the compliance violation to the Fraport AG Compliance Department. In addition, the Compliance Survey sent by Fraport AG is filled in twice a year and submitted to the Fraport AG Compliance Department and TAV Airports Internal Audit, Compliance and Risk Department via e-mail, in pdf format, and with approval. HR, Law and other relevant departments deliver the necessary information to LCO for regular internal reporting.

10. MONITORING AND IMPROVEMENT

Continuous and sustainable development from internal and external findings, information and experiences is the basic principle of Fraport TAV's Compliance Management System.

Evidence of CMS monitoring is kept as a record. Risk analysis, changes made, case study records, semi-annual reports, Fraport AG Compliance Surveys, TAV Corruption Risk Matrix and AFA Questionnaire supplier audit records, if any, are kept as supplier surveys monitoring and improvement records.

11. SANCTIONS

Ethical Counseling, Ethics Committee decisions and Disciplinary Procedure sanctions are applicable in cases where Fraport TAV employees disrupt or have the potential to disrupt compliance. For Fraport TAV suppliers, legal regulations conditions and Code of Conduct is applied for compliance violations. When necessary, commercial relations and shareholder cooperation are terminated.

International sanctions are evaluated and taken necessary action. During the third-party due diligence process, international sanctions are also checked and ADIT System data is taken into account.

12. CONTACT PERSON/S

Questions and notifications from employees about both the notification of detected incidents and potential non-compliance issues can be reported directly to the Compliance Officer or Ethical Consulting.

You can reach the Compliance Officer and Ethical Consultants through the contact information below.

Compliance Officer and Lawyer = LCO

Mobil: 0530 498 46 59

Tel: 0242 315 1037 Dahili:1037

pinar.gursu@antalya-airports.aero

HR & Org.Development Director

Mobil: 0532 341 65 30

Tel: 0242 315 1501

Dahili: 1501 & 1502

tuncay.arici@antalya-airport.aero

13. EXECUTION

The Compliance Officer is responsible for the preparation and complete execution of the Compliance Guide in accordance with the Document Control Procedure, and when necessary, the Quality Department is responsible for its revision, publication and distribution, and its cancellation in case of annulment. All management and employees are responsible for keeping this Guide accessible, communicating it to staff, and complying with the Compliance Guide.

14. REVISION

Compliance Guide revision is made by the Quality Department in accordance with the Document Control Procedure, publish and distribute again.

15. ENFORCEMENT

Compliance Guide will be in force with the approval of the General Manager.