

FRAPORT TAV
ANTALYA TERMINAL MANAGEMENT C.O.



ETHICAL CODE OF CONDUCT-EMPLOYEES
(Etik Davranış Kuralları-Çalışanlar)

Prepared by	Controlled by	Approved by	Approved by
LCO	Quality Manager	General Manager	General Manager

Table of Contents

Top Management Message	3
1. SCOPE and POLICY	4
1.1 Scope.....	4
1.2 Policy.....	4
2. CORPORATE RESPONSIBILITIES.....	4
2.1 Compliance with Laws, Regulations, Adopted Standards, Guidelines and Principles	4
2.2 Rules of Ethical Behavior	5
2.3 Compliance with Human Rights	5
2.3.1 General Acceptance	5
2.3.2 Respect for Diversity.....	6
2.3.3 Gender Based Violation and Harassment (GBVH).....	6
2.3.4 Equal Opportunity and Equal Treatment	7
2.4 Environmental Protection.....	7
3. OUR RESPONSIBILITIES AS BUSINESS PARTNER.....	7
3.1 Anti-Corruption	7
3.2 Gifts and Invitations.....	8
3.3 Conflict of Interest	8
3.4 Donations and Sponsorships.....	8
3.5 Respect for Fair and Free Competition	9
3.6 Internal Trade or Avoiding Unfair Trade.....	9
3.7 Avoiding Money Laundering and Financing Terrorism.....	9
4. OUR RESPONSIBILITIES AS A WORKPLACE	9
4.1 Employee Communication.....	9
4.2 Occupational Health&Safety (OHS) Practices	10
4.3 Information Privacy Protection and Company Secrets.....	10
4.3.1 Protection of Personnel Information	10
4.3.2 Information Integrity and Company Secrets.....	10
4.4 Executing Social Media Communications	10
4.5 Protection of Assets	11
5. EMPLOYEE SUPPORT PROGRAM.....	11
5.1 Officers in the Compliance Organization	11
5.2 Dealing with Errors and Rule Violations	11
5.3 Breach or Suspected Breach Notification and Reporting	12
6. EXECUTION.....	12
7. REVISION.....	12
8. ENFORCEMENT	12

Top Management Message

Dear Fraport TAV Family,

Our organization has become one of the best terminals in Europe, hosting the highest number of passengers, by offering terminal services in accordance with world standards with a customer-oriented approach. This success belongs to its employees who have high knowledge, skills and company values.

Sustainable success can only be achieved by acting in accordance with laws, procedures and ethical principles in business life.

Fraport TAV demonstrates sustainable management by protecting and effectively using natural resources in all its activities. At the same time, it accepts compliance with human rights and the basic standards of the International Labor Organization (ILO) as a corporate principle of the company.

Fraport TAV employees are always committed to its values based on loyalty, fairness, reliability and customer orientation.

One of the main responsibilities of Fraport TAV Management is to develop the success potential of employees.

This document has been prepared in order to present our Standards of Ethical Behavior to all our employees with easy and accessible information, as well as to specify our corporate responsibilities and our business partner and workplace responsibilities.

This document is available to all users in an electronically accessible format.

1. SCOPE and POLICY

1.1 Scope

The Ethical Ethical Code of Conduct covers international regulations, current laws, contract terms and company procedures and instructions.

The Ethical Ethical Code of Conduct is binding for all Fraport TAV employees.

All managers are responsible for disseminating the Code of Ethical Conduct within the company and ensuring compliance. In this sense, managers have the responsibility to be role models.

1.2 Policy

Compliance policy; Integrated with the Management Systems Policy and publicly announced as “Compliance with laws, regulations, internal procedures, accepted standards, and ethical conduct rules together with our employees.” This Policy defines the basic principles that all employees are required to comply with.

2. CORPORATE RESPONSIBILITIES

2.1 Compliance with Laws, Regulations, Adopted Standards, Guidelines and Principles

Fraport TAV takes responsibility for economic, ecological and social issues and always acts in compliance with laws and regulations. Within this framework, we adhere to internationally recognized standards, regulations and principles such as the United Nations (UN) Global Compact, the UN 2030 Agenda and Sustainable Development Goals, the UN Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO). We are committed to complying with all national laws.

Fraport TAV ethical behavior standards are listed below. All our employees comply with these rules without exception.

- a) Not to join into a conflict of interest with Company,
- b) To comply with the rules of gifts, invitations and entertainment,
 - Receiving or giving gifts with a value of more than 50 EUR without approval to not accept gifts above.
 - Exceeding the limits set for representation-hospitality **without approval**: Turkey: **50 EUR, EU Region: 100 EUR, Other: 100 USD**
 - Not accept unpaid travel or luxury entertainment invitations or declaring luxury entertainment bills.
- c) Not to be involved in disgraceful incidents such as bribery, corruption, theft, fraud, embezzlement, terrorism, economic sanctions,
- d) Not to work in a second job without obtaining a second job approval.

- e) Not to discriminate based on gender, sexual orientation, age, religion, ethnicity, color, etc.,
- f) Not to engage in mobbing at the workplace.
- g) Not to abuse the management authority.
- h) Not to make political party propaganda as an employee, not to give financial support to political parties as a company.
- i) Not misuse company assets.
- j) Not to display sexually explicit behavior among co-workers or to send inappropriate messages on social media or other media.
- k) Not to make statements other than corporate policies and opinions in places where the company is represented, to use the title in the company correctly.

It is the ethical behavior standards of our company.

2.2 Rules of Ethical Behavior

Fraport TAV employees do not engage in behaviors contrary to the Code of Ethical Conduct. All our employees accept it as the basic principles in all kinds of business relations.

2.3 Compliance with Human Rights

Fraport TAV assumes primary responsibility for the promotion of human rights. It respects internationally accepted human rights laws, accepts the responsibility to comply with legal requirements as its main duty, and avoids human rights violations during its business activities. Regarding human rights; the Turkish Constitution, the Turkish Human Rights and Equality Institution Law No. 6701 and Many international regulations such as the UN Universal Declaration of Human Rights are taken as reference.

2.3.1 General Acceptance

Respects the human rights of Fraport TAV employees and supplier employees, makes all arrangements and takes measures to protect them.

Fraport TAV accepts the following responsibilities as indispensable:

- Fraport TAV rejects child labor (under 18 years of age) .
- It strictly rejects all forms of forced labor in the workplace, as well as all forms of slavery or slave-like practices, servitude or other forms of domination or oppression.
- Respects the freedom of association and the resulting right to collective bargaining and the right to regulate general working conditions within the framework of national laws.
- Under no circumstances can compensation at Fraport TAV be lower than the applicable legal minimum standards.
- The employee undertakes to comply with the relevant legal provisions and applicable occupational standards regarding working hours, paid leave and public holidays.

2.3.2 Respect for Diversity

As an open-minded company, we value the diversity of our workforce. This ensures that different perspectives and experiences are reflected in our work. With this diversity in daily life, we are able to develop innovative solutions together with our customers. Appreciating and recognizing the diversity of our employees contributes greatly to Fraport TAV 's success in all areas.

2.3.3 Gender Based Violation and Harassment (GBVH)

Fraport TAV prohibits physical and emotional rude behavior and sexual harassment against female employees, and those who commit such violations are questioned by the Ethics Committee within the scope of the Disciplinary Procedure.

The organization references International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD) Joint Guidance on GBVH for Private Sector performance requirements. Taking preventive measures for GBVH not only increases the Occupational Health and Safety performance of the company, but also provides employee motivation. It increases the brand value of the company.

The following measures are taken to prevent of GBVH:

- At Fraport TAV , the human resources policy is reviewed in order to increase the number of female employees and to empower women professionally, and more female employees are included in decision-making positions.
- Authorized senior officers appointed (Compliance Manager appointed) who are given responsibility for ensuring the implementation of ethical commitments and policies for prevention. These responsibilities are expected to be assigned to suppliers and sub-contractors as well, in cases where they are not, the main employer regulations are applied.
- Policies to prevent harassment and emotional behavior violations against female employees are determined in the environmental-social management documents of the organization.
- An anonymous, confidential, easily accessible complaint reporting system is established for employees (Ref: BKMS)
- Photos and concepts that highlight female sexuality cannot be used in any visual or promotional material.
- Fraport TAV advises employees, develops guidance and support systems, and establishes a monitoring system at the highest level. One-on-one interviews, monitoring and auditing are carried out.
- In particular, awareness trainings are taken and cooperation is made with women's organizations in training needs planning.
- In the selection of personnel, they are employed by conducting a disciplinary investigation in their background information.
- In the process of selecting suppliers and subcontractors, the policies and background evaluation of the organizations regarding the ethical code of conduct are taken into account. It uses a third-party evaluation system for this purpose.
- Risk assessment is carried out in order to prevent sexual harassment. It is taken into account that male employees with high risk areas of activity have fewer female employees.
- Safe, secure and separate accommodation is provided for male and female construction workers.
- Adequate lighting is provided around the project areas, including lockable toilets and access roads in predominantly male working environments.

2.3.4 Equal Opportunity and Equal Treatment

Fraport TAV promotes diversity in the workforce and rejects all forms of discrimination. The principle of mutual appreciation and respect is an important part of Fraport TAV 's corporate culture: Fraport TAV always encourages fair, respectful and cooperative relationships. A reporting system has been established for employee complaints and appeals when the sense of fairness is undermined.

The principles listed below form the basis of our actions:

Fraport TAV is determined not to discriminate, exclude or favor people on the basis of their ethnic, national or social origin, race, colour, gender, age, religion or belief.

- Participation in political activity, which is a constitutional right, is respected, but no political discussion, propaganda, or political emblems are allowed in the workplace,
- Restriction of membership in an employee organization, any form of discrimination based on disability or sexual orientation is prohibited.

2.4 Environmental Protection

We work to minimize the negative effects of the results of the establishment's activities on the environment. "Climate change" programs are our strategic aim to monitor and adapt to all developments in our country and in the world.

Environmentally friendly principles can be summarized as follows:

- We are committed to conducting our activities in an environmentally friendly manner. We strive to protect the environment and provide safe and healthy working conditions for our employees.
- We encourage our employees to use natural resources effectively.
- We work for the development and dissemination of environmentally friendly technologies by applying ecological criteria in the selection of products and services.
- As part of our responsibility, we manage greenhouse gas emissions in the most effective way. We are working on plans and projects in line with our 2050 decarbonisation goal.

3. OUR RESPONSIBILITIES AS BUSINESS PARTNER

3.1 Anti-Corruption

Corruption is generally defined as the abuse of entrusted power for personal or private gain. Corruption not only causes material damage, but also hinders the economic, political and social development of a country and ultimately undermines the foundations of a society.

Fraport TAV employees do not bribe or undertake to facilitate their work in business relations or to ensure that they are done in illegal ways, and they do not accept bribes. No form of corruption is tolerated and the impression of corruption is avoided.

Our employees avoid situations where their personal or family interests may conflict with the interests of Fraport TAV . If such a conflict of interest is realized or realized, the person concerned must report this situation to his/her manager. If the employee does not wish to contact his/her manager, he/she can choose one of the following methods: Ethics Consultancy, Compliance Manager or written notification via BKMS. *For detailed information, see "Compliance Guide - Notifications".*

3.2 Gifts and Invitations

Giving and receiving gifts, inviting and accepting invitations are part of the usual forms of social communication and culture in business life. However, gifts and invitations can be understood as improper forms of favoritism or unacceptable forms of influence. All our employees undertake not to offer or accept any valuable gift or invitation that could improperly influence business relationships.

We comply with the following principles in gifts and invitations: Ref. Gifts and Invitations Guide

- Compliance: Gifts or invitations may be made as a gesture of courtesy and appreciation in accordance with local customs and socially acceptable behavior, but must comply with established limits and ethical guidelines.
- Connection to commercial activities: A benefit may never be accepted or given to influence a specific business decision. Even the appearance of such influence should be avoided.
- Frequency: The giving or acceptance of gifts and invitations should be limited to occasional occasions (such as twice a year).
- Public officials: May not exceed company limits and legal limits. Such invitations and gifts should be organized in coordination with the Compliance Manager.
- Documentation: Must be documented and approval processes must be followed.

3.3 Conflict of Interest

Our success is based solely on business decisions made in Fraport's best interests. Employees should not pursue personal interests that conflict with those of Fraport TAV or personally take advantage of business opportunities to which Fraport TAV is entitled.

Conflict of interest : Ref. Conflict of Interest Guide

Conflicts of interest can arise in many ways, for example through financial interests in suppliers, customers or business partners, in the context of secondary employment or through personal relationships between employees and business partners at work.

If a conflict of interest exists or is likely to arise, we implement the following measures:

- A preventive approach is taken to avoid conflicts of interest, a monitoring system is in place, and if they do occur, the actions to be taken are defined.
- Employees are responsible for reporting any conflict of interest to their manager or the LCO in writing as soon as possible.

3.4 Donations and Sponsorships

We assume social responsibility. As a reliable Organization in the region, we promote cultural, educational, sports, ecological and social issues as a partner.

We consider the following principles in this regard:

- We use donations and sponsorship only for purposes that comply with integrity requirements and avoid the appearance of undue influence.
- Donations and sponsorships are made with an understanding of social responsibility according to transparent and clear criteria.

3.5 Respect for Fair and Free Competition

The preservation of free competition is a fundamental requirement for growth, development and employment. Fraport TAV respects fair competition rules and treats its business partners fairly. Agreements, understandings or activities that may undermine free competition are strictly prohibited. Fraport TAV does not tolerate any anti-competitive behavior.

3.6 Internal Trade or Avoiding Unfair Trade

We do not share the company's trade secrets in any way, nor do we try to obtain inside information of other companies. Commercial ethics is a fundamental principle for us. General economic rules and theoretical knowledge, as well as national and international determining rules are always valid for us.

We take into account the following principles for free competition:

- We do not enter into illegal agreements with competitors, especially regarding market segments, capacities and/or customers.
- We do not exchange sensitive/strategic information with competitors, such as prices, price components, costs or investments.
- We do not agree on illegal restrictions with customers or suppliers and we do not illegally exclude anyone.
- We do not and will not manipulate procurement procedures.

We consult with Ethics Advisory on whether a work in progress complies with legal requirements or internal procedures.

3.7 Avoiding Money Laundering and Financing Terrorism

Money laundering (the clandestine incorporation of illegally obtained assets into the legal economic cycle) and terrorist financing (the provision of assets to carry out terrorist activities) are serious threats and are therefore prohibited in many countries around the world. In this context, Fraport TAV supports states' fight against money laundering and terrorist financing and complies with national and international economic sanctions. "List of prohibited organizations" is checked when establishing commercial relations. In case of any doubt, the Financial Units of the Law Enforcement Agencies are informed.

4. OUR RESPONSIBILITIES AS A WORKPLACE

4.1 Employee Communication

The principle of respect is an important component of the Fraport TAV value culture. In the spirit of Fraport TAV, we build fair and respectful relationships with each other. We do not tolerate any form of bullying or verbal, physical or sexual coercion, violence or harassment. We do not tolerate racist, religion-based and sexist attacks.

Our mission defines our expectations from our employees:

- We focus on our work, our goals.
- We become ambassadors of Fraport TAV in every environment.
- We understand our customers' wishes and expectations.
- We adopt continuous learning as our motto, we are always open to change and innovation.

4.2 Occupational Health&Safety (OHS) Practices

Occupational health and safety (OHS) is a key element of our overall corporate responsibility. Fraport TAV takes all preventive measures to protect employees from accidents, work-related health risks and occupational diseases. Fraport TAV provides protective equipment, tools and provides trainings.

Our OHS basic rules are as follows:

- Fraport TAV provides a healthy and safe working environment.
- Conducts risk assessments and shares them with its employees. Our employees know their right not to work in a High Risk environment.
- All our employees demonstrate exemplary behavior by complying with OHS rules.

4.3 Information Privacy Protection and Company Secrets

Fraport TAV employees consider the security and integrity of data and confidential information in business relations as one of the fundamental principles of business activity. Fraport TAV complies with legal requirements and protects the personal data of employees, customers, suppliers and other affected persons and destroys them after the specified period. It fully complies with the provisions of the Personal Data Protection Law No. 6698 applicable in our country.

4.3.1 Protection of Personnel Information

"Personal data" means any information relating to an identified or identifiable natural person. The collection and processing of personal data is only permitted for a specific purpose and has the consent of the person affected (data subject) or other legal basis.

All employees shall comply with the following rules:

- Keep personal data confidential and disclose such data to colleagues only to the extent necessary for the performance of their duties,
- Refrain from collecting or further processing personal data without authorization and, in case of doubt, may seek data protection advice,
- In case the purpose of processing disappears, personal data is deleted,
- In the event of a data security breach, immediately inform his/her supervisor and/or the data protection officer.

4.3.2 Information Integrity and Company Secrets

Knowledge determines our success. Therefore, the protection of data integrity, availability, accessibility and confidentiality of information is vital.

Fraport TAV employees ensure legitimate and protectable confidentiality in business relationships. It takes all measures to protect business secrets against unauthorized acquisition, use and disclosure.

4.4 Executing Social Media Communications

Fraport TAV employees use social media, internet and internal communication platforms such as Facebook, LinkedIn, Instagram, Twitter,...etc when communicating with our customers, employees and the public. We treat each other fairly and positively in the digital space. In doing so, we act with the knowledge that no post published in digital media can be taken back.

It is forbidden to make the following types of posts on social media channels:

- Discriminate against or insult other people,
- Posting unconstitutional or inflammatory messages or manipulating content,
- Damage to our reputation and the reputation of our employees,
- Sharing content that could jeopardize the peace within the group,
- No posting or sharing of messages that misappropriate the intellectual property of others or publish confidential or internal data or information is allowed.

4.5 Protection of Assets

Fraport TAV employees work with an awareness of efficiency and productivity. Therefore, protecting corporate assets is an integral part of our responsibility at work. These rules also apply to property entrusted to Fraport TAV by customers, business partners or passengers.

The following principles apply to asset protection:

- All employees are responsible for protecting Fraport TAV assets from loss, damage and misuse,
- All precortals and document harmonization must be done for the release of payments.
- Assets provided by Fraport TAV (tools, equipment...) will only be used for operational purposes, unless otherwise arranged,
- Employees will treat third party property entrusted to their care with care and attention.

5. EMPLOYEE SUPPORT PROGRAM

Responsibilities have been determined for all kinds of information, training and consultancy support that our employees may need within the scope of the Compliance Management System. Contact information of relevant persons or channels has been announced.

5.1 Officers in the Compliance Organization

All employees have access to information on the Code of Ethical Conduct at any time. Any questions related to compliance can be addressed to the Compliance Manager and/or Ethics Consultants.

Contact Information:

e-mail: etik@antalya-airport.aero

Phone: 0 242 315 1037 or internal 1037

Compliance Organization:

- **Compliance Officer (LCO):** Lawyer.
- **Ethics Consultants:** Lawyer and HR & Org.Development Director
- **Compliance Risk Assessment Committee:** Department/Unit Managers.
- **Ethics Committee:** General Managers, Compliance Manager,HR & Org.Development Director, Relevant Department Manager.

5.2 Dealing with Errors and Rule Violations

Fraport TAV corporate culture is characterized by the values of commitment, reliability, fairness and customer orientation. Mistakes may occur while doing the job, the causes of these mistakes are analyzed and corrected. Fraport TAV Management does not penalize mistakes, but considers learning from mistakes

as an opportunity for improvement. This includes not only mistakes but also the acceptable limits and number of negligence.

Employees are obliged to comply with applicable laws, this Ethical Code of Conduct and internal rules. In case of violation, the Disciplinary Procedure and/or applicable laws apply.

5.3 Breach or Suspected Breach Notification and Reporting

All our employees are expected to act responsibly and in line with the principles set out in the Code of Ethical Conduct-Employee. We always encourage employees to establish open and honest relationships with each other.

It is the primary responsibility of every employee to provide information in case of violation of laws or internal rules. The notification of our employees is important in terms of preventing operational and economic disadvantages caused by non-compliance and damaging our reputation. We guarantee that the employee who reports an irregularity using the various reporting channels will be protected.

Fraport TAV employees can report violations or potential violations in writing to their manager, department manager, Compliance Consultancy or Compliance Manager, depending on the individual's preference. Apart from these, the "BKMS" electronic notification system can be used directly.

Fraport TAV "BKMS" electronic notification system is a system that can be accessed by users who are in contact with Fraport TAV such as employees, business partners and passengers. With this system, positive opinions about Fraport TAV or any violations or potential violations of the Code of Ethical Conduct are reported.

The access address of this system is: <https://www.bkmssystem.net/bkwebanon/report/clientinfo?cin=9icf36>

Please note that in individual cases, we may be required by law to disclose confidential information to third parties. The person who made the report may need to be called as a witness.

In addition to the above-mentioned means of notification, Fraport TAV employees may also notify the relevant channels of Fraport TAV or the Chief Compliance Officer of Fraport AG or the Ombudsperson of Fraport AG at parsch@ombudsfrau-parsch.de. For more information, please visit the website of the Fraport AG ombudsperson: www.ombudsfrau-parsch.de

Likewise, a report can be made to TAV Airports Compliance and Risk Department by entering the Company Code +90 212 900 34 54/ 5313 or directly to ADP Headquarters via the link provided. <https://report.whistleb.com/fr/adp>

Violation notifications are reported by the Compliance Manager to the Senior Management, Fraport AG and TAV Airports.

6. EXECUTION

Fraport TAV management and employees are responsible for the implementation of the scope of the Ethical Code of Conduct-Employee.

7. REVISION

Ethical Code of Conduct-Employee revision are made by the Quality Department in accordance with the Document Control Procedure and published again.

8. ENFORCEMENT

Ethical Code of Conduct-Employee will be in force with the approval of the General Manager.