

SCOPE OF APPLICATION

Reports or notifications of violations of human rights and breaches of environmental laws, regulations and Code of Conduct within the Fraport TAV and at direct suppliers can be submitted through the following complaints/whistleblowing channels.

COMPLAINTS CHANNELS

There are many access channels for making complaints. This document only describes access with the BKMS system.

Via web page: For all parties in both English and Türkçe languages

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=9icf36&c=-1&language=eng>

Via intranet: For company employees only in Türkçe.

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=9icf36&c=-1&language=tur>

RESPONSIBILITIES AND CONTACT PERSON

Complaints related with compliance issues are handled by the Quality-Compliance Department of Fraport TAV. The contact person is the head of the Compliance Department, Dr. Musa Güngören and any other complaints are handled by Ece Başar in line with existing *Grievance (Complaint) Mechanism Procedure* (8.46.KY.1.61).

HOW THE COMPLAINTS PROCEDURE WORKS

Complaints are received by the Quality-Compliance Department. The whistleblower receives a confirmation of receipt and is kept informed of the next steps that will be taken and the progress of the procedure.

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-complaint is within the scope of CMS issues, the Compliance Manager handles it directly in coordination with Human Resources Department Assistant Manager. If the receiving notification is not related to CMS, it is handled within the scope of the Grievance Mechanism Procedure. In this process, it is examined whether any collection, processing, or use of data that takes place in the course of the investigation is permissible under Personal Data Protection Law (6698).

The aim of the investigation is to clarify the facts of the matter that are the subject of the report in a neutral, competent, and objective manner. The investigation of the facts is carried out in line with CMS Guideline "Article 8 Notification Transactions" by suitable persons, who are required to act independently and maintain confidentiality. They contact the whistleblower, check the validity of the report that has been received, and, if necessary, request the whistleblower to provide more information. Reports of breaches at a direct supplier are investigated jointly with the supplier. The investigation is conducted on the basis of documents and interviews and is recorded comprehensibly in a case file. Case files are deleted once a year if there is no legitimate interest in retaining them. The whistleblower receives feedback on the progress of the procedure within one month following confirmation of receipt of their report. Feedback is provided

only insofar as this does not affect any internal investigations and the rights of the persons who are the subject of a report or who are named in the report are not adversely affected.

Each case concludes with a written final report, which remains strictly confidential. The list of people to whom the report is distributed depends on the nature and severity of the breaches that are identified and is determined on a case-by-case basis. Information is disclosed only if this is necessary and permitted under Personal Data Protection Law. The final report includes penalties and suitable actions for remedying irregularities and preventing similar breaches in the future. After the investigation has been concluded, the whistleblower is notified of the follow-up actions to be taken, if this is permitted by law.

PROTECTION 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 employer after they have submitted a report.

Reports made with malicious intent to influence employees are definitely not accepted. 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 be provided with special protection against reprisals and may be subject to liability in these cases.

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