



FRAPORT TAV
ANTALYA TERMINAL MANAGEMENT INC.



GIFTS, INVITATION and HOSPITALITY GUIDELINE
(Hediye, Davet ve Ağırlama Kılavuzu)

Prepared by	Controlled by	Approved by	Approved by
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1. PURPOSE, SCOPE

1.1 Purpose

The purpose of the Gifts and Invitations Guideline is to outline the general rules and principles regarding the gift taking-delivering and invite or accept the invitation from third parties in order to establish and maintain a business relationship with Fraport TAV (FTA).

Benefits in the form of gifts and invitations are part of the usual forms of social contact in business life. To ensure integrity and to give you certainty of action, this guideline regulates the appropriate handling of gifts and invitations.

Expect of FTA employees to comply with the principles for handling gifts, invitations and other benefits and to ensure the necessary transparency in dealing with this issue.

1.2 Scope

This Guide covers all gifts and invitations made by Fraport TAV employees and managers for any reason. Limits have been determined within the scope of ethical rules.

The following regulations are binding for all Fraport TAV employees and managers. They apply to the granting and acceptance of gifts and invitations.

2. PRINCIPLES FOR GIFTS and INVITATIONS

Fraport TAV Employees, in their relations with business partners and public officials, they cannot receive or give gifts or invitations that affect or risk affecting business processes in any way. In particular, any form of bribe payment as well as gifts, invitations or immaterial benefits intended to obtain an unfair advantage are prohibited

The granting or acceptance of a gift or invitation must always comply with internal regulations and applicable laws.

The following criteria must be observed both when accepting and when granting benefits:

Appropriateness

Gifts or invitations must conform to local customs and customary social behavior. It should be done as a courtesy and a gesture of appreciation, but not above defined value (for gifts 50 EUR, for invitations 50 EUR in Turkey, 100 EUR in EU countries, 100 USD in USA and other).

Business context

During ongoing contract negotiations or invitations to bid, the granting or acceptance of gifts and invitations is to be omitted. A benefit may never be accepted or granted in order to influence a specific business decision. Even the appearance of such influence must be avoided.

Accompanying persons

Invitations of accompanying persons (family, children, partners, friends) are possible in exceptional cases and must be approved by the supervisor.

Frequency

The granting or acceptance of gifts and invitations shall be limited to special occasions. Irrespective of the value of the benefit, promptly repeated benefits from and to the same business partner are prohibited.

Public Officials

Invitations or gifts to public officials involve a higher risk and are generally prohibited. Exceptions are subject to the specifications of this guideline.

Documentation

Each employee shall ensure that regarding both the acceptance and the granting of gifts and invitations, he/she will comply with and document the specifications and approval processes set out in this guideline.

3. RECEIVING AND GIVING VALUABLE GIFTS

Giving or receiving a gift; means offering, presenting, stating intent or realizing anything (goods, assets, services, etc.) directly or indirectly to/from a third party, to/from a business partner (including government officials) etc. Gifts exceeding the limits set in this document are considered valuable gifts. No gifts of value may be received or given without the approval of the LCO and General Managers. Gifts over 50 EUR are considered Valuable Gifts.

Valuable gifts, e.g. watches, silk carpets, high-quality spirits or art, which are not in adherence with customary social behavior, must be refused.

Valuable gifts received in obligatory circumstances are delivered to the company. These gifts are kept in accordance with the Valuable Goods and Documentation Procedure. If such materials need to be donated or sold, the Lost and Found Items Instruction terms apply.

Exceptions can only be made if it would be impolite to refuse the gift or, in the case of gifts from guests abroad, would be contrary to customary national practice. In the case of such gifts, superiors and LCO must be informed immediately, who will decide on the use of the gift.

3.1 Questions to Ask Before Accepting or Giving Gifts

Before buying or giving gifts, the following basic questions should be asked, and if the answer is "yes", no attempt should be made to receive or give gifts.

- a) Is the monetary value of the gift within the limits of 50 EUR?
- b) When accepting a gift, did you feel uncomfortable that the gift giver wanted to influence you?
- c) Am I in any contract negotiations?
- d) Does the gift consist of precious metals, jeweler, cash or other valuable instruments of monetary value?
- e) Does the gift contain a substantially objectionable item or situation (for example: prohibited items or sexually explicit offers..)?
- f) Do I need to hide the receiving or giving gift from my colleagues, manager or relatives?

3.2 Inadmissible Gift

- a) If the answer is "yes" to the questions listed above or similar, the gift cannot be accepted.
- b) Fraport TAV employees are prohibited from accepting gifts or benefits that are directly or indirectly above the limit set in all works between individuals, institutions and organizations that have a business relationship with our company.

- c) Cash money given to a Fraport TAV employee or family members by 3rd Parties liquid values that can replace cash, credit, remittance, bank transfers are not giving or receiving as gifts.
- d) If any gift or other benefit can be considered as illegal or as an attempt to influence their decisions unfairly by the customer, or if it may create obligation and/or dependency, this gift cannot given-received.

3.3 Gifts That Don't Require Approval

- a) The gifts or benefits offered are in accordance with the laws and regulations, the policies and activities of the company; Gifts with an annual cumulative value of less than EUR 50, which are generally accepted by the business community and within the limits, may be accepted or given without approval.
- b) Gifts that are within the limits of corporate ethical standards and that do not exceed the limit determined by relevant or precedent laws,
- c) Promotional materials bearing the Fraport TAV logo,
- d) Gifts related to events directly organized by Fraport TAV,
- e) Gifts related to events sponsored by Fraport TAV

3.4 Rules of Receiving and Giving Gifts

- a) The limit for giving and receiving gifts at Fraport TAV is defined as 50 EUR/year cumulatively. Additional approval must be obtained from the Senior Management in case of exceeding the limit, both on an annual basis and on a value basis. In all cases, the identity of the person to whom the gift is received or to be given, the description of the gift and its estimated value in EUR are indicated.
- b) In order to ensure adequate transparency, if the gift is appropriate in terms of type but exceeds the limit, it is registered by the LCO and approved by the General Managers. This rule applies to employees at all levels within the company hierarchy.
- c) The main rule is that the person accepting the gift does not need to hide that he has accepted the gift or benefit and is not forced to do anything in any way because he has received this gift.
- d) In accepting gifts, there should be no objections when superiors or colleagues learn about it. In case of any doubt, the manager should be informed to obtain his/her approval.
- e) In case of receiving or giving gifts that do not comply with the determined rules, General Managers and LCO must be informed.

4. INVITATION AND HOSPITALITY

4.1 Definitions

Although invitation and hospitality are examined under two separate headings, entertainment will be provided for invitations that require travel. However, both invitation and hospitality include an invitation only to the hospitality dinner.

Invitation: The invitation of public officials, members of business partners, members of third parties who are in charge of our company for any reason, to social, cultural and sports entertainment activities, dinners or accepting such invitations. If the invitation requires travel, the rules and limits given in **Table 1** are valid.

Hospitality-Hosting: Within the scope of hospitality values, a dinner party is given to public officials, members of business partners, and members of third parties who are in charge of our company for any reason.

4.2 Acceptance of Invitations and Hospitality

Fraport TAV employees cannot accept organizational tickets and vouchers, flight tickets, discounted or free material and vehicle use, holiday invitations, valuable gifts and benefits, unless these are offered to all Fraport TAV staff.

Invitations for official opening or celebration ceremonies, conferences, fairs, councils, meetings etc. may be accepted if they are made by the Public Institution.

- a) The limit for invitation and hosting with meals is determined as 50 EUR in Turkey, 100 EUR in the European Union countries, and 100 USD in the USA and other countries.
- b) The content of the invitation and entertainment should be clearly defined in terms of its purpose and scope,
- c) The place of invitation and hosting and the participants should be clearly stated.
- d) The cost of invitation and entertainment must be within the limits determined per person.
- e) If an invitation is to be sent, it should be sent to the business address of the person concerned together with the program,
- f) In exceptional cases, luxury expenditure documents made during accepted travels cannot be declared.
- g) It is essential that such invitations and hospitality are offered without the expectation or thought of providing unfair service or commercial advantage in return.

4.3 Exceptions in Invitation and Hospitality

The following situations, which are within the specified limits, are not specific to the person or company, do not require any benefit in return, and are not inconvenient to be disclosed, are allowed.

- a) Invitation to participate in product promotion events, trade fairs, meetings, festivals, anniversaries, openings etc. can only be accepted if the travel expenses are covered by Fraport TAV within the framework of the official business trip.
- b) Promotional gifts (gifts with the company logo), flight invitations, promotional meeting invitations, include all FTA employees or may be accepted if approved by the Senior Management,
- c) Participation in business lunches,
- d) Invitations related to events directly organized by Fraport TAV,
- e) Participation in official opening or celebration ceremonies, social events, invitations to participate in sponsored institution-organization events are accepted within the scope of exceptions.

These rules cover all Fraport TAV employees, in case of any violation of the rules, an investigation is carried out by the LCO, and if necessary, it is evaluated by the Ethics Committee within the scope of the Disciplinary Procedure.

5. GIFT, INVITATION AND HOSPITALITY LIMITS

These limits can be changed with the approval of the General Managers. The superiors are informed when there is or will be a limit exceeding. Expenditures made for this purpose are documented with expense documents. Expense documents are declared with the Cost List and the approval of the General Manager is obtained. Limit excess declarations are recorded and followed up by the LCO. The issues of inviting, accepting invitations or hosting are summarized in **Table 1** for third parties and **Table 2** for FTA employees

Limits for Third Parties

Giving Gifts, Hospitality and Invitation Limits for 3rd Parties							
Related Parties	Giving Gift (EUR)	Hospitality		Invitation			Ref:
		Domestic	Inter.	Event Invitation	Accommodation	Transportation	
<u>Shareholders/Stakeholders</u>	50	50	EU: 100 EUR ABD: 100 USD Diğer: 100 USD	Open invitation	5 Star Hotel	Economi Ticket	CMS Arct.4.3
3rd parties for business purposes (TSE, Audit Institutions ...)	50	50	-	Open invitation	5 Star Hotel	Economi Ticket	CMS Arct.4.3
Public Officials	50	50	-	Open invitation	5 Star Hotel	Economi Ticket	CMS Arct.4.3

Table 1.

Limits for FTA Employees

Receiving Gift , Hospitality and Invitation Acceptance Limits for FTA Employee							
Related Parties	Gift Receiving (EUR)	Hospitality		Invitation			Ref:
		Domestic	Inter.	Event Invitation	Accommodation	Transportation	
<u>Shareholders/Stakeholders</u>	50	Acceptable	Acceptable	Open invitation	Unacceptable	Unacceptable	CMS Arct.4.3
3rd parties for business purposes (TSE, Audit Institutions ...)	50	Acceptable	Acceptable	Open invitation	Unacceptable	Unacceptable	CMS Arct.4.3
Public Officials	50	Acceptable	Acceptable	Open invitation	Acceptable	Acceptable	CMS Arct.4.3

Table 2.

6. DOCUMENTATION FOR GIFTS, INVITATIONS, HOSPITALITY AND CONFIRMATION OF LIMIT EXCEEDING

Gifts given or accepted within the scope of the determined rules and the value of which exceeds defined limits individually or cumulatively per year are recorded with the Gift-Invitation-Hosting Declaration Form (Annex-1). Same form is used for the invitation and hosting which exceeds defined limits. This form is approved by the LCO and General Managers.

Gifts given to public officials or 3rd party employees on special occasions such as New Year's Eve, holidays, anniversary, birthday etc., with the decision of the Top Management (GMs), are recorded by the Corporate

Communications Department with the Gift Tracking List (Annex-2). This list is evaluated by the LCO and approved by the General Managers. Gifts exceeding the limit are registered by the LCO.

All original invoices or receipts of expenditures made in relation to the Gift Tracking List (Annex-1) and Invitation Tracking List (Annex 3) are submitted to the Accounting Department for proper recording of the transactions in the financial statements.

7. COMMUNICATION AND REPORTING

In order to prevent potential, apparent or real non-compliance, all employees must notify as soon as possible, through the following methods or directly with relevant persons.

7.1 Communication Channels and Responsible Persons

When an issue regarding gift, invitation employees shall also informed to:

- Own manager or
- Company Compliance Officer (LCO) or
- Ethics Concultant

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

Compliance Manager and Quality Manager = LCO

Mobile: 0533 486 14 13

Tel: 0242 315 1035 Internal: 1035 or 1036

musa.gungoren@antalya-airport.aero

Lawyer

Mobile: 0530 498 46 59

Tel: 0242 315 1037

Internal: 1037

pinar.gursu@antalya-airports.aero

Human Resources Manager

Mobile: 0531 08013 37

Tel: 0242 315 1507

Internal: 1507

yucehan.akyuz@antalya-airport.aero

Employees or business partners employees can report any identified or potential conflict of interest directly via BKMS, publicly or anonymously. BKMS system can be accessed via intranet and internet.

The internet-based Business Keeper Monitoring System (BKMS®) can be accessed via the following hyperlink:

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

7.2 Reporting

Regular reporting is made twice a year within the scope of CMS. Cases of non-compliance are also part of the report. However, the documents specified in Article 6 are kept as records by the LCO and included in

the report. In addition, for gifts and invitations that are known in advance, the relevant employee obtains permission in advance by filling out the Gift, Invitation, Declaration Form or get the confirmation from superior.

Despite these measures, if non-conformities regarding gifts and invitations are detected or reported, LCO conducts an investigation, prepares a report and submits it to the Ethics Committee for evaluation of the situation. All non-conformances are included in periodic reports sent to parent companies' CMS Departments.

8. EXECUTION

Fraport TAV management and employees are responsible for the implementation of the scope of the Gift, Invitation and Hospitality Guideline.

9. REVISION

Gift, Invitation and Hospitality Guideline revision are made by the Quality Department in accordance with the Document Control Procedure, publish and distribute again.

10. ENFORCEMENT

Gift, Invitation and Hospitality Guideline will be in force with the approval of the General Managers.