

Code of Business Conduct and Ethics Manual

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0. Management and Control

0.1 Foreword

Turkish Airlines' Code of Business Conduct and Ethics Manual (the “**Code**”) sets forth the fundamental principles that guide all of us in our day-to-day business dealings. It articulates our Core Values and Principles and the related standards of behavior that define our corporate culture. Following the Code - and understanding and complying with the various laws and regulations that govern our business - are critical to achieving our business objectives while, at the same time, meeting the expectations of our customers, shareholders, business partners, government authorities and the public.

It is important to comply with both the “letter” and the “spirit” of the Code and the laws and regulations referred to in the Code. Moreover, all of us should seek to conduct ourselves in a manner that continuously improves Turkish Airlines' reputation. It is not possible for this Code to address every legal or ethical challenge that we may face in our day-to-day transactions. With this regard, activities must be handled with good judgment and common sense, even if they are not addressed in the Code. This approach should help us reach ethical decisions, but we should never hesitate to seek assistance whenever we encounter an ethical dilemma that we cannot resolve on our own.

Each of us plays a role in maintaining and advancing our Core Values and Principles. Honoring and “living” these values and principles is what will continue to enhance our brand in the markets and communities we serve.

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0.2 Ordinary Revision Records

REVISION NO	REVISION DATE
00	The revision date is on the cover page.

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0.4 Table of Revisions

Revision Number	Definition of Amendment
00	First Publication

0.5 Scope of Implementation

Ethics, in its most basic sense, examines value judgments that have general validity and are universally accepted in human relations. Business ethics, on the other hand, covers the set of principles developed to guide behavior in

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business life. As Türk Hava Yolları Anonim Ortaklığı (dba Turkish Airlines), our core values and principles guide our business ethics rules, while forming our expectations, standards and ethical practices that form the basis of all our business relationships and transactions. This Code covers Turkish Airlines, its employees and all third parties acting on behalf of Turkish Airlines including contractors and suppliers.

This Code is a set of rules that summarizes our mutual responsibilities, reflects our core values and principles, and guides our employees, the people and other institutions we do business with, and the public on acceptable and unacceptable behavior.

This Code contains information pertaining to certain Company policies and practices. Every employee is expected to read this Code carefully as it is a valuable reference for understanding your job responsibilities. Not all Company policies and procedures are set forth in this Code. If you have any questions or concerns about this Code, please consult your manager or the Legal and Compliance Department.

All employees of the Company must abide by and adhere to this Code. Nothing contained in this Code or an employee's adherence with it shall be construed as constituting or creating a contract of employment, a guarantee of continued employment with the Company (for any period of time) or any other contract or provision of rights, whether express or implied, in any employee, contractor, agent or client of the Company.

Over time, it may be necessary to amend this Code. Any amendments will be made in accordance with law as per the detailed instructions explained in PR.10.18.039 Procedure For Preparation Of Documents and TL.18.006 Instruction On Preparation Of Document, and current versions of the Code can be found on the DDMS.

This Code is the property of the Company and all rights are reserved.

0.6 References and Documents Referred

The documents referenced and referred in this Code are listed below.

DK.21.005 Law on the Protection of Personal Data

DK.21.039 6331 Occupational Health And Safety Law

DK.21.048 Anti-Smuggling Law (No. 5607)

DK.21.069 Act No. 5549 On Prevention Of Laundering Proceeds Of Crime Law

DK.21.070 Act No. 4054 On Protection Of The Competition

DK.21.071 Act No. 4518 On Authorizing Convention On Combating Bribery Of Foreign Public Officials In International Business Transactions

DK.21.101 Labor Law No. 4857

DK.21.123 Occupational Health And Safety Services Regulation

DK.21.124 General Data Protection Regulation

DK.21.137 Environmental Law No. 2872

DK.21.155 Unions And Collective Bargaining Law No. 6356

DK.21.202 Turkish Penal Code

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DK.21.304 Turkish Code Of Commerce

Referred Documents:

PR.01.14.001 Procedure Of Legal

PR.01.30.001 Human Resources Procedure

PR.01.40.001 Purchasing And Sales Procedure

PR.02.11.001 Media Relations And Monitoring Procedure

PL.10.30.001 Occupational Health And Safety Policy

EK.10.32.001 Occupational Health And Safety Management Manual

EK.10.32.003 Cabin Personnel Occupational Health and Safety Manual

PR.10.12.021 Procedure For Information Systems Acceptable Usage

PR.10.14.001 Personal Data Breach Management and Response Plan Procedure

PR.10.14.002 Data Subject Requests Procedure

PR.10.14.003 Personal Data Retention And Destruction Procedure

PR.10.14.005 Special Categories Of Personal Data Processing And Protection Procedure

PR.10.18.039 Procedure For Preparation Of Documents

PR.10.32.010 Procedures For Assessment Of Occupational Health and Safety Following and Compliance With Legal and Other Conditions

PR.10.32.011 Procedure For Occupational Health And Safety Communication, Involvement And Consultation

PR.10.32.012 Occupational Health and Safety Performance Measurement and Monitoring Procedure

PR.10.32.013 Occupational Health and Safety Risk Assessment Procedure

PR.10.32.014 Occupational Health and Safety (OHS) Delegate, Volunteer and Representative Procedure

PR.10.32.087 Personal Protective Equipment Selection And Evaluation Procedure

PR.10.35.091 Procedure For Occupational Health and Safety Emergency

PR.10.35.092 Occupational Health and Safety Emergency Drill Procedure

PR.10.32.093 Procedure For Training Of Occupational Health And Safety Emergency Teams

PR.10.32.094 Procedure For Occupational Health And Safety Emergency Behavior

PR.10.32.097 Procedure For Medical Examination For Alcohol And Psychoactive Substances

PL.10.35.001 Our Human Rights And Employee Rights Policy

PR.10.35.005 Occupational Health and Safety Management System Risk and Opportunity Management Procedure

PR.10.35.084 Ethics Board Procedure

PR.10.85.001 Information Security Management System Procedure

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PR.10.88.003 Personnel Confidentiality Procedure

PR.30.080 Supplier Firm Occupational Health And Safety Activity Procedure

PR.32.014 Joint Health Security Unit Service Procurement And Control Procedure

PR.32.081 Occupational Accident, Occupational Disease And Near-Miss Incidents Management Procedure

PR.32.082 Supplier And Sub-Employee Occupational Health And Safety Activities Procedure

PR.32.083 Occupational Health and Safety Field Surveillance Procedure

PR.32.084 Procedures For Occupational Health And Safety Committees

PR.32.085 Occupational Health And Safety Measurement, Control And Test Procedure

TL.18.006 Instruction On Preparation Of Document

TL.32.010 Instruction On FSTD Operation Area Emergency Situation Case

Turkish Airlines Protection of Personal Data Announcement for Employees

GDPR Privacy Announcement for Employees and Contractors

Privacy Notice for Employees available on <https://webapps01.thy.com/KVKK/Site/index.html> web

0.7 Definitions

Digital Document Management System (DDMS): The system in which all documents prepared within the Company in accordance with the Management Systems requirements and the national and international rules and standards are managed digitally, and the issuance, revision, and cancellation processes required by the Company are carried out and monitored.

Electronic Document Management System (EDMS): The system in which the Company's correspondences are managed and the document approvals are submitted to the relevant users.

Ethic Line: Turkish Airlines employee hotline.

Code: EK.01.14.001 Code of Business Conduct and Ethics Manual of Turkish Airlines.

Confidential Information: All non-public and valuable information for the Company.

Personal Data: The information that can be used to identify an employee, customer, or other individuals.

Company: Turkish Airlines and its subsidiaries.

IFRS: International Financial Reporting Standards.

Managers: Company's officials and other employees with management responsibilities.

0.8 Responsibility

While the Legal and Compliance Department is responsible for constitution and amendment of this Code, Company's all units are responsible for employees' knowledge of content and their implementation of duties herein.

Table 2: Table of Responsibilities

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RESPONSIBLE UNITS	SECTIONS	DEFINITION OF RESPONSIBILITY
Company's all units	0,1,2,3,4,5,6,7,8,9,10,11,12	Company's all units and employees are responsible for knowledge of content and implementation of duties here in this Code.

1. Core Values and Principles

Turkish Airlines, including its subsidiaries (collectively the "Company"), is committed to conducting business ethically and in accordance with all applicable laws and regulations, especially requirements in DK.21.005 Law on the Protection of Personal Data, DK.21.039 6331 Occupational Health And Safety Law, DK.21.101 Labor Law No. 4857, DK.21.124 General Data Protection Regulation, DK.21.137 Environmental Law No. 2872, DK.21.155 Unions And Collective Bargaining Law No. 6356, DK.21.202 Turkish Penal Code and DK.21.304 Turkish Code Of Commerce. This Code is a guide and source to help each of us to enhance the Company's culture and reputation by articulating how we deal with one another, as well as how we treat our customers, shareholders, business partners, government authorities and the public.

Each employee's acknowledgement of and adherence to the Code is a condition of employment. Although the Code is designed to apply primarily to the Company's employees and staff, the Company expects all parties who work on its behalf, including independent contractors and consultants, to embrace the spirit of the Code and adhere to its principles and standards.

The Code sets forth certain values and standards of behavior, which are expanded upon in the Company's written policies and procedures. Each of us is responsible for familiarizing ourselves and complying with these more specific policies and procedures located in DDMS as appropriate. For convenience, the Article "0.6 References and Documents Referred" of this Code contains references to some, but not all, of these policies located in DDMS. Individual business units may adopt policies and procedures that are more restrictive than those set out in this Code or other specific Company policies.

The Company's Core Values and Principles are:

- Honesty and Fair Dealing
- Customer Satisfaction
- Respect to Individuals
- Innovation
- Team Work
- Leadership
- Productivity
- An "Open Door" Policy

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1.1 Honesty and Fair Dealing

We should be honest, fair and trustworthy in all our business dealings, always paying attention to ethical standards.

In carrying out our roles and responsibilities, our goal should be to demonstrate the highest standards of behavior. Remember, our day-to-day conduct reflects not only the culture of the Company - as the flag carrier airline we are also associated (in the minds of people around the world) with Türkiye itself. We should be a source of pride for Türkiye and never forget that we are an ambassador for the country.

This means being honest and fair in our relations with our shareholders, customers, suppliers, competitors, employees and all other persons or institutions we deal with.

Not only should we *do things right*, we should also *do the right things*.

1.2 Customer Satisfaction

Part of the Company's culture is that we anticipate the needs of our customers. We do this by thoroughly evaluating and assessing those needs, and by doing everything we can to operate as a customer-focused enterprise. In addition, we do this better and faster than our competitors. This focus on customer satisfaction helps us to build long-lasting relationships with loyal customers.

1.3 Demonstrating Respect to Individuals

Each of us is important to the overall success of the Company. And successful companies tend to have employees who come from a diverse range of cultural and other backgrounds. The Company does not tolerate discrimination of any kind. Rather, we expect our people to treat each other with kindness and respect. We should care for, listen to, and learn from each other.

All of us play a part in establishing and maintaining a safe, constructive and respectful work environment, where people feel empowered to be themselves and to express their ideas freely.

Those of us with managerial responsibilities should work with our staff to develop and implement their career plans, thus helping our people to achieve their individual and professional goals. We should also delegate responsibility appropriately, while giving our people the necessary tools and work environment to enable them to thrive.

1.4 Innovation

Innovation is a building block of our current success, and crucial to our continued development and future prosperity. We should welcome new ideas and creativity by encouraging and rewarding innovative behavior in the Company.

Innovation often means taking risks. However, smart innovation involves proper assessment and management of risk. Therefore, innovation is a calculated risk-taking when necessary as a result of the risk analysis. Ultimately, we should be seeking to discover and implement new ideas to make our products and services (not to mention our work procedures and processes) better. This type of innovation benefits the Company and our customers, thus helping us to meet and often exceed their expectations.

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1.5 Teamwork

In order to be our best, we must work together across all corporate and geographic boundaries. Teamwork should be actively fostered by the Company and expected of all our people. This means that we see every employee as a valued member of the team, contributing their unique skills and experience to our collective efforts.

We believe that through teamwork, the Company's objectives will be best communicated and shared across our business. This should improve the speed and quality of decision-making processes, as well as the dissemination of best practices. Through continuously learning and improving together, a feeling of success and "team spirit" will prevail in the Company and give us a competitive advantage in the market.

1.6 Leadership

The Company is committed to providing our people with opportunities to be leaders at every level of the business. We believe that leaders are people who create and share a positive vision of the Company, and who step forward to accomplish difficult tasks while guiding, improving and motivating the people around them. Leadership can take different forms, but on overriding objective of it should be to foster and celebrate individual and team success.

Leaders inspire others to discover and use their unique skills and abilities. They also help to diffuse and resolve disputes by reminding people of common goals and interests. Leaders are the "glue" that holds the Company together, as well as the "engine" that propels it forward.

1.7 Productivity

We operate in a competitive business environment and need to perform our best if we are to achieve our goals as individuals and as a Company. This means making the best use of the resources at our disposal and always executing on our plans. We should constantly strive to be more efficient and productive, and never allow laziness, inertia or disorganization to undermine our success.

In seeking to maximize our performance, we need to assess ourselves honestly and with rigor and be open to constructive feedback from others. We and the Company should set high (but clear, realistic, and reachable) targets and measure our performance against those targets.

1.8 "Open Door" Policy

The Company seeks to cultivate an environment of transparency, openness and accessibility. This "Open Door" policy means that executives and managers are expected to be available to their staff, and to answer questions and make all necessary time to listen to (and address) any legitimate concerns or complaints. This policy extends to all issues that might come up in a business context, but it is particularly important with respect to legal and/or ethical issues. None of us should ever hesitate in escalating such concerns in compliance with this Code.

2. Making Ethical Decisions

Maintaining the Company's culture of integrity requires each of us to demonstrate ethical behavior in all our business activities. By acting ethically, we can have a strong influence on the conduct of those around us and with whom we interact. Acting with integrity requires us to make ethical decisions. While the rules set out in this Code will help address specific situations, the following decision tree provides a general method for analyzing contemplated actions.

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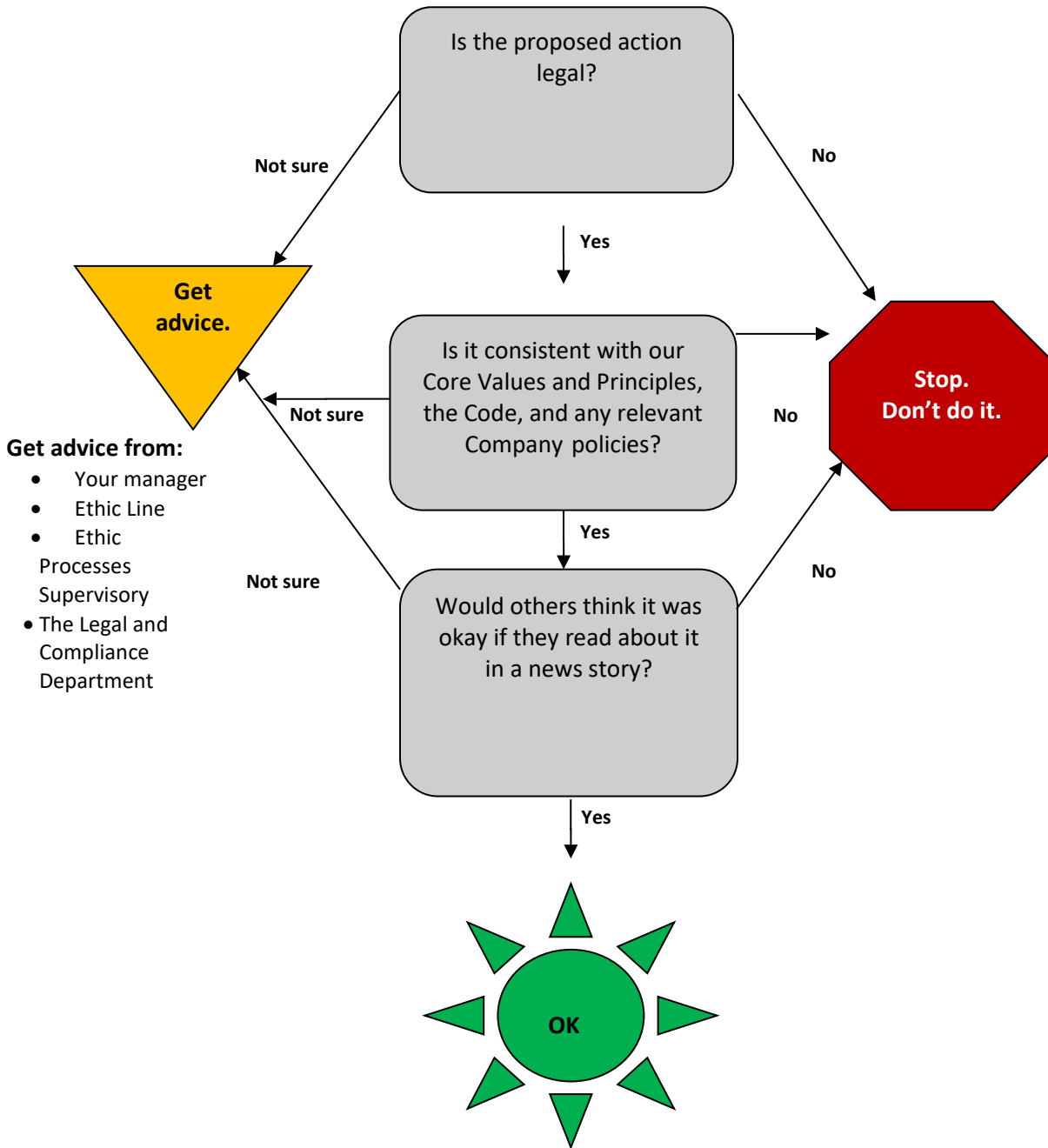


Figure-1: Ethical Decision Chart

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3. Our Responsibilities

3.1 Responsibilities of Employees

All of us have a role to play in enhancing the Company's reputation in the community and making the Company a better place to work. Accordingly, all of us must review and follow the Code, as well as other applicable policies and procedures located in DDMS.

All of us are responsible for ensuring adherence to our Core Values and Principles by helping to enforce the Code's provisions. Any employee who becomes aware of an issue or practice involving a potential violation of law or Company policy, including the Code, is strongly encouraged to report the matter immediately (please consult the "Where to Get Help" section in this Code).

The following exemplary conduct must be reported as soon as possible:

- Knowledge of a violation of the PR.10.88.003 Personnel Confidentiality Procedure
- Harassment
- Insult
- Discrimination
- Mobbing
- Corruption
- Bribe
- Money laundering
- Human trafficking

3.2 Responsibilities of the Company

The Company is responsible for articulating the standards and expectations set out in the Code, and for monitoring everyone's compliance with those standards and expectations. The Company will investigate and seek to resolve any known or suspected violation of law, especially DK.21.005 Law on the Protection of Personal Data, DK.21.039 6331 Occupational Health And Safety Law, DK.21.101 Labor Law No. 4857, DK.21.123 Occupational Health And Safety Services Regulation, DK.21.124 General Data Protection Regulation, DK.21.137 Environmental Law No. 2872, DK.21.155 Unions And Collective Bargaining Law No. 6356, DK.21.202 Turkish Penal Code, DK.21.304 Turkish Code Of Commerce, the Code or Company policy in a prompt, fair, and impartial manner, in accordance with applicable law and policies. The scope and precise manner in which an investigation is conducted will vary depending upon the circumstances of the issue or conduct being investigated. To the extent consistent with applicable law, employees are obligated to cooperate fully, promptly, and truthfully in any investigation conducted by the Company (or conducted by an authorized outside third party, including a government agency).

All kinds of measures, including dismissal, may be taken against any employee who violates the Code or any applicable law, regulation or Company policy as provided in PR.01.30.001 Human Resources Procedure.

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3.3 Additional Responsibilities of Managers

As Managers, we are accountable to Company as an employee. In addition to our responsibilities as employees, we must lead by example and set a tone that reinforces the importance of compliance and ethical business conduct.

Therefore we cannot ignore potential Code, legal, or policy violations that we become aware of. We are required to report any such concerns to Ethic Line via any of the communication channels under Article 4.1 The Ethic Line of this Code. We must also make ourselves available to employees who have ethical questions or wish to report possible misconduct.

4. Where to Get Help

Employees are encouraged to raise questions or concerns within their management chain. If an employee cannot raise or resolve an issue with his or her immediate manager, or if he or she is uncomfortable doing so, the employee should contact his or her next level of manager or Ethic Line via any of the communication channels under Article 4.1 The Ethic Line of this Code.

4.1 The Ethic Line

The Ethic Line reporting line is designed to provide an avenue for anyone to report allegations or concerns of suspected wrongdoing, on an anonymous or confidential basis, 24 hours a day, 365 days a year. When anonymity is not requested, the identity of callers will be kept confidential to the extent reasonably possible and consistent with law and good business practices. All reported matters will be appropriately investigated.

The Ethic Line reporting line can be reached via Ethic Line number [REDACTED] and [REDACTED] or directly [REDACTED] as anonymous.

Please refer to the procedure below:

PR.10.35.084 Ethics Board Procedure

4.2 Questions about the Code

Employees are also encouraged to ask questions about aspects of the Code or related Company policies. Managers, Ethic Line, Ethic Processes Supervisory and/or Legal and Compliance Department staff can all be helpful in answering such questions. Employees can reach to Ethic Line via any of the communication channels under Article 4.1 The Ethic Line of this Code.

4.3 Non-Retaliation Policy

The Company will not tolerate retaliation against any individual who - based on his or her reasonable, good faith belief - reports a concern about potential unlawful or unethical conduct or a possible actual or suspected violation of the Code or other Company policies or procedures. Similarly, the Company will not tolerate retaliation against an employee or vendor who assists or otherwise participates in good faith in the resolution of a complaint or in an internal or external investigation or proceeding.

At the same time, it is unacceptable to knowingly make a false complaint or allegation, or to make a false or misleading statement during the course of any investigation. Managers have the additional responsibility to ensure that the employees they supervise diligently comply with these non-retaliation obligations.

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For assistance with questions about the Code or other ethics and compliance matters, you should contact your manager, Ethic Line via any of the communication channels under Article 4.1 The Ethic Line of this Code, or the Legal and Compliance Department from [REDACTED] e-mail address.

There are several ways to report potential misconduct, including the following:

- It is the responsibility of the affiliated unit to investigate and evaluate the operational problems and discrepancies encountered in operational processes. It is also the responsibility of the affiliated unit to correct such problems and discrepancies. Therefore, inappropriate behavior should first be to contact the next level of managers or the administratively affiliated department.
- If there is no result obtained despite the repeated reports to the affiliated units, Ethics Board can be notified.
- An inappropriate behavior can be included in the Ethics Board agenda by making a notification to the Ethic Line reporting line

5. Compliance with Laws

In performing our day-to-day responsibilities, each of us must comply with both the letter and spirit of applicable laws and regulations.

As a global Company, we conduct activities across the world and are subject to the laws and regulations of all the countries where we have operations and/or do business. While the basic principles of this Code should apply throughout our work locations, there may be some instances where local law conflicts with the requirements of this Code. If local law or custom conflicts, or appears to conflict, with this Code or an otherwise applicable legal requirement, or you are otherwise unsure or unclear about a legal requirement, you first must contact the local lawyer representing the Company in such jurisdiction immediately and in case such issue cannot be resolved on local level, please reach Legal and Compliance Department via EDMS according to the Article 5 Requesting Legal Opinion from Legal Department of PR.01.14.001 Procedure Of Legal to seek guidance and help.

6. Respect for Each Other

It is a Company's important policy to provide employees with a healthy, safe, productive working environment and respecting human rights. This environment extends beyond our physical surroundings and includes how we interact with and treat one another. Each of us recognizes the importance of mutual respect when dealing with our colleagues. We will deal fairly with our co-workers, treat them with respect and dignity, and will not take unfair advantage of them.

6.1 Diversity

We recognize the contribution of our diverse workforce to our success as an organization. We place great value on maintaining and supporting our diverse workforce and on welcoming, accepting, and rewarding each person according to his or her contribution to the attainment of the Company's goals. We also value a work environment where diversity is embraced and where our differences are respected.

6.2 Equal Opportunity and Nondiscrimination

The Company is an equal opportunity employer that places a strong emphasis on diversity. All employment decisions, including those related to recruiting, hiring, promotions, and compensation, are made solely on the basis of job-related criteria and will be administered free from discrimination based on any characteristic protected by law or Company

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policy, notwithstanding the requirements of DK.21.155 Unions And Collective Bargaining Law No. 6356. The Company will make reasonable accommodations for the known physical limitations or disability of an otherwise qualified individual who is an applicant or an employee in accordance with applicable law.

6.3 Human Rights

The basic principle of our Company is to serve human rights with respect and in accordance with international working standards. The health, safety, dignity and well-being of our employees, customers, partners, contractors and anyone who may be affected by our activities in every area where our partnership operates is our highest priority.

Our commitment to operate with respect to human rights covers all of our internal and external stakeholders, especially for employees, customers, suppliers and partners.

Please refer to the policy below:

PL.10.35.001 Our Human Rights And Employee Rights Policy

6.4 Bullying and Harassment

All employees should be treated with respect and dignity. The Company prohibits bullying and unlawful harassment in any form - whether verbal, written, physical, or visual. Employees are strongly encouraged to report incidents of bullying or harassment, and managers are required to do so. For specific information on how and where to report incidents of harassment, please consult the “Where to Get Help” section of this Code.

6.5 Maintaining a Safe and Secure Workplace

We must follow the laws and regulations of the jurisdictions where we work regarding workplace safety and health, especially DK.21.039 6331 Occupational Health And Safety Law and DK.21.123 Occupational Health And Safety Services Regulation, as well as all the Company’s security requirements.

Please refer to the procedures below:

Our policy for occupational health and safety; PL.10.30.001 Occupational Health And Safety Policy,

Our manual for occupational health and safety; EK.10.32.001 Occupational Health And Safety Management Manual,

Our manual for cabin crew; EK.10.32.003 Cabin Personnel Occupational Health and Safety Manual,

For operating all activities in compliance with occupational health and safety requirements; PR.10.32.010 Procedures For Assessment Of Occupational Health and Safety Following and Compliance With Legal and Other Conditions,

Communication, contribution and counseling methods for occupational health and safety; PR.10.32.011 Procedure For Occupational Health And Safety Communication, Involvement And Consultation,

For monitoring, measuring, analysis and evaluation of compliance with occupational health and safety; PR.10.32.012 Occupational Health and Safety Performance Measurement and Monitoring Procedure,

For determination of the procedures and principles of the risk assessment to be made in terms of occupational health and safety; PR.10.32.013 Occupational Health and Safety Risk Assessment Procedure,

For election and duties of OHD delegates, volunteers and representatives; PR.10.32.014 Occupational Health and Safety (OHS) Delegate, Volunteer and Representative Procedure,

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For the features of personal protective equipment that should be used as a preventative against work accidents and occupational diseases; PR.10.32.087 Personal Protective Equipment Selection And Evaluation Procedure,

For the management of occupational health and safety emergencies; PR.10.35.091 Procedure For Occupational Health and Safety Emergency,

For simulation practices to be carried out in locations; PR.10.35.092 Occupational Health and Safety Emergency Drill Procedure,

For occupational health and safety teams' emergency trainings; PR.10.32.093 Procedure For Training Of Occupational Health And Safety Emergency Teams,

For actions to be taken in occupational health and safety emergencies; PR.10.32.094 Procedure For Occupational Health And Safety Emergency Behavior,

For the evaluation of risks and opportunities related to Occupational Health and Safety Management System; PR.10.35.005 Occupational Health and Safety Management System Risk and Opportunity Management Procedure,

For regulation of the suppliers' activities related to occupational health and safety; PR.30.080 Supplier Firm Occupational Health And Safety Activity Procedure,

For Joint Health Security Unit (OSGB) services carried out in affiliated workplaces; PR.32.014 Joint Health Security Unit Service Procurement And Control Procedure,

For management of near-miss incidents, injury or ill health, work accidents, occupational diseases; PR.32.081 Occupational Accident, Occupational Disease And Near-Miss Incidents Management Procedure,

For determination of the subcontractor companies' obligations related to occupational health and safety; PR.32.082 Supplier And Sub-Employee Occupational Health And Safety Activities Procedure,

For field inspections of all locations and activities in accordance with occupational health and safety; PR.32.083 Occupational Health and Safety Field Surveillance Procedure

For the establishment and functioning of occupational health and safety committees; PR.32.084 Procedures For Occupational Health And Safety Committees,

For measurement, control and testing of workplaces, buildings and work equipment; PR.32.085 Occupational Health And Safety Measurement, Control And Test Procedure,

For standard behaviors in emergency situations; TL.32.010 Instruction On FSTD Operation Area Emergency Situation Case.

6.6 Violence and Threatening Behavior

The Company prohibits any acts or threats of destruction or violence by any employee toward any other person (especially another employee, customer, vendor, or visitor) or Company property, whether at Company facilities or elsewhere. The Company will not tolerate any acts or threats of violence made by any individual against our employees, customers, or visitors.

To support the Company's objective in providing a safe and healthy work environment, the Company strictly prohibits the following:

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- Threatening behavior or acts of violence, including the use of obscene, abusive, or threatening language or gestures.
- Bringing firearms, explosives, or other weapons onto Company premises.

6.7 Substance Abuse

Abuse of illegal drugs and other substances has an adverse effect on the Company's ability to provide its products and services to customers and to protect the health and safety of the Company's customers and employees. The Company is therefore committed to maintaining a drug and substance-free workplace. The unlawful manufacture, distribution, dispensation, possession, or use of controlled substances is prohibited in the Company's facilities or while conducting Company business. Employees may not report to work or remain on duty if under the influence of or impaired by any drug or other substance.

Employees may be tested when they display unusual behavior or when there is a reasonable suspicion of drug or alcohol abuse or subjected to spot check.

Please refer to the procedures below:

- PR.10.32.097 Procedure For Medical Examination For Alcohol And Psychoactive Substances_ and for all details of disciplinary actions mentioned in this procedure; PR.01.30.001 Human Resources Procedure
- For the supervision, prevention and detection of psychoactive substance use and out-of-limit alcohol use of the employees within the scope of the legislation of the General Directorate of Civil Aviation; PR.10.32.097 Procedure For Medical Examination For Alcohol And Psychoactive Substances_.

7. Protecting Confidential Information

7.1 Confidentiality and proprietary information

Information we develop, or to which we gain access, in connection with our employment at the Company is an important corporate asset that must be used only for the Company's business purposes. Confidential information isn't always marked "restricted", "sensitive", or "proprietary"—in fact, most confidential items are simply things you learn while working for the Company. It may be information about the Company, our customers, our vendors or any other person or business engaged in a relationship with the Company. In essence: confidential information includes all information that is valuable to the Company and not generally known to the public.

This information also must be protected from inappropriate disclosure to customers, competitors, financial analysts, the media, and other third parties. You must not disclose confidential Customer information to any person other than in the proper discharge of your duties - if you disclose it, you would engage in an illegal act or could be helping competitors or harming the Company or its customers. The duty to keep and hold information in confidence continues even after you leave the employment of the Company.

When we are unsure whether certain information is confidential or not, we should always exercise caution and seek advice from the Directory of Information Technologies Security according to the PR.10.85.001 Information Security Management System Procedure when deemed necessary.

7.2 Employee Confidential Information

Employee personal information and data must always be considered confidential and may only be used for legitimate business purposes and in compliance with applicable laws, rules, and regulations.

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7.3 Third-Party Confidential Information

Information disclosed by a customer or a supplier to a Company employee (which is clearly identified orally or in writing as sensitive, private, proprietary, privileged, or confidential) should be protected from disclosure to unauthorized persons inside and outside the Company to the same extent that we protect the Company's confidential information.

We will not share such information with a third party or another Company employee or agent who does not have a legitimate business need to know it or where such sharing is legally or contractually restricted.

It is important to protect confidential information even outside the work environment. When we are with family and friends, it may be tempting to talk about what is going on at work. Inadvertently revealing confidential information to family and friends, however, can lead to serious consequences. If you are talking to family members or friends who work for competitors, the information can be used to hurt the Company. In addition, if a family member or friend uses non-public information learned from you to trade in the securities of any Company, you and they could be subject to liability for violating insider trading laws.

7.4 Personal Data Protection

Personal Data is information that can be used to identify an employee, customer or other individual. When this information is misused, it may be a violation of applicable privacy laws, especially DK.21.005 Law on the Protection of Personal Data. Some examples of Personal Data are credit card numbers, social security numbers, account usernames and passwords, e-mail addresses, financial information and health information, but it also includes basic contact information about individuals in many jurisdictions.

This information is located in our computer databases and networks, on paper, in our business processes, and sometimes in the words we speak. You do not keep Personal Data in any way, even for operational transactions, on your personal device (phone, tablet, computer, etc.) and / or do not transfer them to third parties through your personal device and / or insecure applications (WhatsApp, etc.) You have a responsibility to keep this information safe by following procedures, operating our technology systems properly, and collecting and maintaining information in ways that protect it against unauthorized use.

You have responsibility to inform data subjects where it is necessary to collect Personal Data in accordance with the applicable law especially DK.21.005 Law on the Protection of Personal Data and, if necessary, collect explicit consent of the data subject, at the time of collection and act in accordance with the PR.10.14.003 Personal Data Retention And Destruction Procedure in cases where the situations requiring the processing of Personal Data no longer exist.

You have a responsibility to immediately report any actual or suspected event that has led to or may lead to the unauthorized acquisition of Personal Data maintained, collected, or used by the Company to the Legal and Compliance Department.

Please refer to the procedures below:

- For confidentiality standards to be applied to employees who may exchange information due to job description; PR.10.88.003 Personnel Confidentiality Procedure,
- For methods to be followed in personal data confidentiality breach; PR.10.14.001 Personal Data Breach Management and Response Plan Procedure,

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- For methods to be followed in personal data retention and destruction; PR.10.14.003 Personal Data Retention and Destruction Procedure,
- For methods to be followed in the applications of data subject natural persons regarding their personal data processed within the Company; PR.10.14.002 Data Subject Requests Procedure,
- For information on the purposes of processing personal data, the rights of the data owner and communication ways; Turkish Airlines Protection of Personal Data Announcement for Employees,
- For information on the purposes of processing personal data, the rights of the data owner and communication ways within the scope of European Union legislation; GDPR Privacy Announcement for Employees and Contractors
- For methods to be followed in processing and security of special categories of personal data; PR.10.14.005 Special Categories Of Personal Data Processing And Protection Procedure,
- Privacy Notice for Employees

8. Sanctions and Trade Compliance

The Company is committed to complying with all applicable economic and trade sanctions, as well as export and import laws and regulations which govern the transfer between countries of certain technical data, equipment, and technology. The export licensing and controls that govern such transfers, as well as the rules pertaining to the import of goods and services, are complex and designed to achieve various objectives, including national security and policy interests, preventing the proliferation of weapons of mass destruction, implementing anti-terrorism and crime controls, and protecting human rights.

An effective sanctions and trade compliance program impact many departments; as such, and depending on their function, Company employees and those acting on behalf of the Company are responsible for understanding the export control laws and economic sanctions requirements of the countries in which they operate and ensuring that the Company's export activities in each country are consistent with applicable laws and regulations. We will endeavor to avoid even inadvertent violations by undertaking appropriate due diligence measures before undertaking new ventures, operations, partnerships, or other activities that may raise possible compliance risks.

Such restrictions may include financial or trade sanctions or embargoes that may prohibit the Company from engaging in certain business activities in specified countries and/or with specified individuals and entities. Sanctions and embargoes of this type may be imposed by multinational organizations like the United Nations or the European Union, and/or by individual countries such as Türkiye, the United States or the United Kingdom.

To ensure compliance with these laws, sanctions, and embargoes, please consult with the Legal and Compliance Department from [REDACTED] e-mail address if you have any questions or are unsure whether a relevant sanctions regime or embargo may apply to the Company's activities.

9. Anti-Money Laundering

Airlines can be used as platforms for a range of illicit activities, from smuggling and fraud to money laundering and terrorism. To combat such illicit activities, Company employees that detect, or otherwise notice, suspicious activity will notify their next level of managers and those managers are required to report such activity to the upper management of the Company. Suspicious activities are not limited to those indicating or posing an aviation security threat. Working with

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intelligence and information sharing authorities, and consistent with applicable laws and regulations, the Company will identify a range of persons of interest to the appropriate law enforcement authorities, as the circumstances may dictate. We must carefully review all payments and transactions with customers, vendors, business partners, agents and affiliates. We will not accept any payments that appear to have come from illegal activities or conduct.

Subject to applicable laws and regulations, the Company encourages the cooperation and sharing of data with other government agencies, including aviation security authorities, to allow for more enhanced, risk-based screening of passengers and cargo. Since indicators of possible money laundering or terrorist conduct may be triggered by a range of activities, the Company will coordinate with customs/border agencies, aviation security, and law enforcement, as necessary.

10. Business Integrity

10.1 Anti-Bribery and Corruption

We will strictly comply with the anti-corruption laws that govern our operations in the countries in which we do business. This includes, but is not limited to the DK.21.069 Act No. 5549 On Prevention Of Laundering Proceeds Of Crime Law and DK.21.048 NO 5607 Anti-Smuggling Law, as well as the corresponding laws enacted by other countries including those made in conformity with multinational conventions such as the OECD's (*Organisation for Economic Co-operation and Development*) DK.21.071 Act No. 4518 On Authorizing Convention On Combating Bribery Of Foreign Public Officials In International Business Transactions. Generally, these laws prohibit bribery, directly or indirectly, of foreign government officials (including employees of foreign government-owned entities), political parties, or candidates to obtain some improper business advantage. More specifically, they prohibit companies and their employees and agents, directly or indirectly, from corruptly providing, offering, or promising anything of value to foreign officials or foreign political parties, officials, or candidates, for the purpose of influencing them to misuse their official capacity to obtain, keep, or direct business or to gain any improper advantage.

We will never offer bribes, kickbacks, or other illegal, improper, or unauthorized payments. The funds and assets of the Company will not be used, directly or indirectly, for payments, gifts, or gratuities of any kind, whether legal or illegal, which, directly or indirectly, inure to the personal benefit of any agent or employee of any entity with which the Company does business. Under no circumstances may the payment of a gratuity or fee be made to a government official or employee, whether in recognition of efficient service or otherwise.

To facilitate the delivery of goods and services to markets across the world, the Company relies on an array of dealers, distributors, agents, or consultants. In this regard, we will not enter into any agreements with dealers, distributors, agents, or consultants:

- that are not in compliance with any applicable laws; or
- that provide for a commission, rate, or fee that is not reasonable and commensurate with the functions or services to be rendered.

We will never accept bribes, kickbacks, or other illegal payments. If we are offered such a payment, we will decline to accept it, and we will report the incident to our next level of managers and those managers are required to report such activity to the upper management of the Company. In addition, we will inform our next level managers by reporting the incompatible behaviors in any way other than illegal payment.

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10.2 Gifts, Entertainment, and Other Business Courtesies

The Company or employees do not use the exchange of gifts, entertainment or other business courtesies to gain an unfair competitive advantage. As an employee of the Company, you must remember that the giving or acceptance of even a well-intentioned gift or offer of entertainment can be misinterpreted as an attempt to improperly influence business behavior.

When dealing with government entities and representatives, providing business courtesies may be strictly limited or even prohibited by law.

10.2.1 Giving of Gifts, Entertainment, or Other Gratuities to Government Employees and Elected Officials

Government departments and agencies may be governed by laws and regulations concerning acceptance by their employees or elected officials of entertainment, meals, gifts, gratuities, and other things of value from firms and persons with which those departments and agencies conduct business or over which they exercise regulatory authority or oversight. It is the Company's policy to strictly comply with such laws and regulations.

10.2.2 Offering or Providing Business Courtesies to Non-Government Persons

Subject to the other rules set out in this Code, business gifts, meals, and entertainment of reasonable value may be provided to non-government individuals in support of business activities, so long as these courtesies are not offered for any improper purpose, do not violate any law or regulation, do not relate to work on a government contract, and do not violate the standards of conduct of the recipient's organization.

10.2.3 Acceptance of Business Courtesies by Employees Carrying Out Procurement Functions

Employees who buy goods or services for the Company or are involved in the procurement process must treat all suppliers uniformly and fairly. Decisions about competing suppliers must be made objectively, all facts must be weighed impartially, and even the appearance of favoritism must be avoided. For this reason, employees carrying out procurement functions may not accept gifts from suppliers or vendors, except advertising or promotional items of nominal value, such as a pen, keychain, water bottle, visor, cup, or glass or generally similar items displaying a supplier's logo.

10.2.4 Acceptance of Business Courtesies by Employees in Non-Procurement Functions

To avoid the appearance that business decisions are being improperly influenced by personal favors, you must:

- *Not ask for gifts, entertainment, travel, or anything else of value;*
- *Not accept cash;*
- *Not accept gift cards, gift certificates, or other cash equivalents. Gift cards worth [\$25] (or the local equivalent) or less in aggregate value per source per calendar year are acceptable;*

Not accept gifts totaling more than [\$100] (or the local equivalent) in aggregate value per source per calendar year. If you are offered a gift worth more than [\$100] and believe that it would genuinely cause offense to refuse it, please contact your next level of managers and those managers are required to report such activity to the upper management of the Company for advice as to how to proceed.

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You generally may accept:

- Business meals and entertainment (i.e., meals and entertainment that have a business purpose and at which the donor is present) that are not lavish, frequent, or in excess of generally accepted practices and that do not involve inappropriate activities (e.g., adult entertainment);
- Tangible gifts totaling [\$100] (or the local equivalent) or less in aggregate value per source per calendar year;
- Gift cards, gift certificates, or other cash equivalents totaling [\$25] (or the local equivalent) or less in aggregate value per source per calendar year; and
- Gifts from family or friends that are personal and are not offered because of your status as an employee of the Company.

10.3 Avoiding Conflicts of Interest

A conflict of interest occurs when an employee's private interests interfere—or appear to interfere—with the interests of the Company. When conducting business, fulfilling duties or exercising authorities on behalf of the Company, each of us must avoid conflicts of interest and base our decisions on the Company's needs, rather than on our personal interests or those of our families and friends. We may not take for ourselves opportunities that are discovered through the use of Company property, information, or position and may not use such property, information, or position for personal gain or to compete against the Company.

10.3.1 Outside Employment and Other Outside Activities

A conflict of interest may arise if an employee engages in any outside activities that may be inconsistent with the Company's business interests. Each of us has a responsibility to avoid situations in which our loyalty to the Company or availability to perform our job duties when required could be compromised. Determining whether a particular situation would create a conflict of interest requires the analysis of specific factual circumstances and the consideration of many factors.

Employees must undertake any such outside activities on their personal time and must continue to meet the performance standards of their job with the Company.

Any employee who wishes to serve on the board of any for-profit organization (or on an advisory committee for such an organization) should take into consideration restrictions and exclusions given under PR.01.30.001 Human Resources Procedure Article 6.15 Prohibition on Other Works and Services. There exists no restriction on positions available with nonprofit organizations or registered charities.

10.3.2 Immediate Family and Household Members

Situations may arise in which a competitor, vendor, or supplier employs an immediate family or household member of one of our employees. These situations call for extra sensitivity to security, confidentiality of information, and conflicts of interest. You must not use your personal influence to induce the Company to do business with a company in which your immediate family or household members have an interest.

To avoid the appearance that business decisions are being driven by family relationships rather than business needs, prior approval must be received before knowingly hiring someone whose immediate family member

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works for a Company customer or business partner where the family member has influence over that party's purchasing decisions. If we become aware of such circumstance, a prior approval would be necessary for that person to be hired in a department which would not create any conflict of interest. (for these purposes, immediate family members do not include relatives more distant than first cousins). Prior approval must be obtained in writing from the Directorate of Human Resources.

We may not attempt to avoid the provisions of the Code or of any Company policy or procedure by asking or allowing a family or household member to do something that the Code, policy, or procedure prohibits us from doing personally. For example, if the receipt by an employee of a gift from a business partner is prohibited by the Code, in most cases it will also be inappropriate for the business partner to provide the gift to the employee's spouse.

10.3.3 Personal Business Relationships, Investments, and Insider Trading

Personal business relationships should not influence, or even appear to influence, our work for the Company. Any substantial interest that we or our immediate family members have in the Company's suppliers, clients, or competitors must be disclosed to the Legal and Compliance Department and the Investor Relations Department.

Personal ownership of stock in a publicly traded company that is a supplier, client, or competitor can also create real or potential conflicts of interest. In most cases, the ownership of such stock will not be problematic, but employees should avoid holding a significant amount of stock in an entity with whom he/she interacts on behalf of the Company. What constitutes a significant amount of stock will vary depending upon the situation but might for example include an amount worth more than 5% of the employee's household net worth, or an amount exceeding more than 1% of the shares of a publicly traded company. When in doubt seek assistance from Directorate of Human Resources/ Asst. Dir. Human Resources (Domestic) via [REDACTED].

While working at the Company, employees may learn about material information related to another company before the general public learns about this information. The use of "inside," or non-public, material information in connection with the purchase or sale of securities is unethical and is generally prohibited by law. Non-public material information includes information about any company that has not been effectively disclosed to the general public, and that could, if known, affect a reasonable investor's decision to buy or sell the securities of that company. These restrictions apply whether an individual is trading for his or her own accounts or trading on behalf of any other person or entity. Similarly, it is generally unlawful to disclose non-public, material information to others so that they may trade in securities based on that information.

10.4 Fraud and Theft

Any act that involves theft, fraud, embezzlement, or misappropriation of any property or funds whether owned by the Company or someone else is prohibited.

10.5 Use of Company Assets, Property and Systems

As employees, we all have an obligation to protect the Company's assets. In general, we will use the Company's financial resources, communication systems (such as email, Internet access, and telephones) and other assets only for business-related purposes and in a manner that complies with Company policy and promotes their efficient and legal use.

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Each of us is responsible for safeguarding and maintaining any Company property that is entrusted to our control. You must exercise reasonable care to avoid damage or unusual wear and tear. Similarly, you must protect Company assets by refraining from installing or using unapproved or unlicensed software, bypassing the Company's information security measures, or otherwise tampering with systems or data in an unauthorized or harmful manner. The integrity of these systems also requires all employees to secure passwords and other personal access information in order to prevent unauthorized access to the Company's systems.

Company policies include some restrictions about the occasional, incidental personal use of the Company's electronic communications systems. The upper management of the Company reserves the right, consistent with local law, to monitor and/or access all e-mails or other system activity contained on or flowing through the system. As employees, we should have no any expectation of privacy regarding the use of e-mail or Internet provided by the Company, and strive to fully comply with the rules and principles provided in the PR.10.12.021 Procedure For Information Systems Acceptable Usage.

10.6 Intellectual Property

The Company's intellectual property (such as ideas, inventions, discoveries, trade secrets, copyrighted material, patented material, and trademarks) is a valuable corporate asset that we must work to protect. We also will respect the intellectual property rights of third parties.

Subject to certain limited exceptions, the Company owns everything (including products, processes, information, models, financial and data structures, software, documentation, methodologies and other materials, and all related intellectual property) that is created or modified by employees in connection with their jobs, produced using the Company's resources, or related to the Company's business in any way, shape or form.

10.7 Vendor Selection

When purchasing materials or services for the Company, all of us must strive to ensure that the Company receives the best available materials and services based on competitive terms and prices according with all the requirements of PR.01.40.001 Purchasing And Sales Procedure.

10.8 Truthful and Accurate Reporting

Truthful and accurate financial and business records are critical to the Company's reputation. The Company's funds, assets, and transactions must be properly and accurately recorded on the books and records of the Company and in accordance with International Financial Reporting Standards ("IFRS") and practices. We will not falsify or render misleading any book, record, or account that reflects transactions of the Company or dispositions of Company assets. Each of us must complete expense forms and timesheets truthfully and accurately.

We will make expenditures on behalf of the Company only if we are authorized to do so. Goods and services will be procured in compliance with the Company's PR.01.40.001 Purchasing And Sales Procedure, and we will complete required documentation accurately and timely.

No payment made on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.

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The Company's business records, documents and records prepared for submission to a government agency, and public disclosures must be truthful, accurate, fair, and understandable given their intended use. If you prepare reports or records based on information provided by others, you must exercise reasonable care to be sure that those reports or records do not contain misrepresentations or misleading information.

10.9 Improper Influence on Conduct of Audits

Independent auditors periodically audit the Company financial statements. We will not directly or indirectly take any action to coerce, manipulate, mislead, or fraudulently influence any independent or certified public accountant engaged in the performance of an audit or review of the Company's financial statements for the purpose of rendering those financial statements materially misleading, nor will we direct any other person to do so.

You must cooperate fully, promptly, and truthfully in any audit of the Company's financial statements by its auditors. This obligation includes, among other things, responding to requests for information, participating in interviews, and disclosing all information relating to the subject matter of the audit.

11. Fair Dealing and Fair Competition

11.1 Fair Dealing

We will deal fairly with all clients, vendors, competitors, and others with whom we interact for any business-related purposes. When transacting business, you must not misrepresent or omit material facts, manipulate or conceal non-confidential business information necessary to understand a proposed business transaction, disclose or threaten to disclose confidential business information, or otherwise engage in any other type of unfair dealing or practice.

11.2 Anti-Competitive Activities

We recognize the importance of fair business competition, and we will comply with antitrust laws, especially DK.21.070 Act No. 4054 On Protection Of The Competition. In general, these laws prohibit certain types of monopolistic behavior, activities designed to restrain trade, unfair methods of competition, deceptive acts, or practices and other similar practices. Questions regarding application of the antitrust laws should be directed to the Legal and Compliance Department via EDMS according to the Article 5 Requesting Legal Opinion from Legal Department of PR.01.14.001 Procedure Of Legal.

11.3 Competitive Information

Any information we obtain about our competitors will be gathered through ethical and legal means. We respect the confidential information and trade secrets of others, including former employers of our colleagues. If you are aware of a confidentiality obligation to a colleague's former employer, you must not violate that obligation. Never ask or encourage newly hired employees to divulge their prior employers' confidential information.

12. Role in the Community

12.1 Sustainability

It is the Company's responsibility to promote sustainability while performing all our duties and providing services, in order to reduce our environmental impact, contribute to the community and economic development. Our Company which is subject to a number of environmental laws and regulations, aims to go beyond complying with the law, to reduce the adverse impacts of our operations on the climate and environmental and leaving a habitable world to the

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future generations. Besides, we are aware that corporate social responsibility is a universal matter. In this context, our Company supports the social responsibility projects by taking place in many recent local projects to contribute the local economic and social development in the countries our Company has flight operations to. You can find out more by consulting our annual Sustainability Reports and PL.10.18.005 Sustainability Policy.

12.2 Personal Community Activities

When volunteering personal time or resources to charitable, religious, social, recreational, political, public service, or civic organizations, you must be sensitive to the need to distinguish your role as a private citizen from your role as an employee of the Company.

12.3 Interacting with the Media, the Investment Community, and Others outside the Company

Only authorized persons can speak as representatives of the Company. Requests for information from outside sources should be referred to the department identified in the applicable Company policy (e.g., Media Relations for media inquiries, Investor Relations for shareholder issues, etc.). If you receive a request for information or documents from any other type of person (e.g. government official, regulator, attorney, investigator, or any other non-employee or an unknown person), you must consult with the Legal and Compliance Department via EDMS according to the Article 5 Requesting Legal Opinion from Legal Department of PR.01.14.001 Procedure Of Legal prior to engaging in any discussion or providing any information or documents.

In all cases, the disclosure of information to third parties should be approached in a careful and deliberate manner to ensure accuracy and in order to make sure the inquiry is legitimate and not being made fraudulently or for some other improper purpose. No information should be shared with third parties unless the identity of the requestor and the purpose of the request has been confirmed as legitimate. Any questions should be directed to a member of the Legal and Compliance Department via EDMS according to the Article 5 Requesting Legal Opinion from Legal Department of PR.01.14.001 Procedure Of Legal.

12.4 Personal Public Statements and Publications

The Company is subject to close scrutiny from many sources. For this reason, it is particularly important that any public statement or act attributable to the Company be carefully considered and that your personal views do not enter into, or influence, the content of what is stated.

Each of us must take steps to ensure that our private actions are not construed as the Company's actions. For example, if you express personal opinions to an audience who may know of your affiliation with the Company, you must state clearly that your comments represent your personal opinions and not those of the Company.

For any article we plan to publish or any speech we would make as an employee of the Company, whether it is intended to be a personal opinion or not, we must obtain the prior approval of the Directorate of Media Relations according to the PR.02.11.001 Media Relations And Monitoring Procedure.

The communications guidelines described here also apply to social media channels (e.g., blogs, chat rooms, social networking sites such as Facebook, Twitter or LinkedIn etc.). Even a seemingly harmless email or comment on a blog to a person outside the Company may be construed as an official Company comment and may be forwarded to or viewed by thousands of people, including the media.

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12.5 Political Activities

We will not contribute any Company funds or other assets directly or indirectly to any political party or to the campaign for or against any candidate for political office if prohibited by law.

Personal participation in the political process is an essential part of our society, and we may fully engage in the political process consistent with our personal views, convictions, and interests. It is important to remember, though, that there are restrictions on corporate involvement in the election process and corporate dealings with government officials. Accordingly, we must distinguish our individual actions and views from those of the Company when engaging in personal political activity. The use of the Company's resources, property, or vendors may be interpreted to be an indirect form of the Company's political activity; therefore, we may not use the Company's resources or property for personal political activity. Our involvement and participation in the political process must be on an individual basis, on our own time, and at our own expense.

To help ensure that conflicts are avoided, you must notify the Legal and Compliance Department via EDMS according to the Article 5 Requesting Legal Opinion from Legal Department of PR.01.14.001 Procedure Of Legal about any political office or government-related positions that you are seeking or to which you have been elected or appointed.