



Supplier Code of Conduct Policy

Turkish Airlines Inc. declares its Supplier Code of Conduct Policy to guide all the suppliers it cooperates with and to draw attention to the principles of the [Code of Ethics Manual](#) during the activities such as passenger transportation, cargo transportation and training activities it carries out in accordance with the national and international standards.

The basis of the Supplier Code of Conduct Policy set out in this document is Turkish Airlines Inc. [Code of Ethics Manual](#). Our Incorporation expects all its suppliers to comply with the principles of the [Code of Ethics Manual](#) within the scope of the applicable law and Turkish Airlines Inc. procedures.

Turkish Airlines Inc. aims to cooperate with the suppliers that will further improve its sustainability performance in the supply chain. To this end, the Supplier Code of Conduct Policy outlines the minimum standards of conduct for all suppliers. Turkish Airlines Inc. expects its suppliers to comply with the Supplier Code of Conduct Policy, which it has published in addition to quality aspects and commercial issues, with due diligence, and establish an open dialogue about all difficulties encountered by conducting a transparent operation.

Compliance with Laws

Turkish Airlines Inc. considers compliance with the international and local laws and regulations in all countries where it operates as one of its primary duties. This situation is also stated in Article 1.1 Responsibilities of the [Code of Ethics Manual](#). As part of our corporate responsibility, Turkish Airlines Inc. expects the suppliers with whom it cooperates to comply with all international and local laws and regulations, including the countries where they operate or provide services.

Respecting Human Rights

Turkish Airlines Inc. considers respecting human rights and providing services in accordance with the international labor standards as its basic principle. In all its activity areas, it regards the health, safety, respectability, and wellness of its employees, customers, business partners, contractors, and everybody who may be affected by our activities as its top priority. It also expects its suppliers to protect human rights, provide services in accordance with the international labor standards, and create a work environment that respects human rights.

Equality-Fair Treatment

In accordance with the principle of Equality and Fair Treatment that is based on article 2.1 Honesty and Fair Dealing of the [Code of Ethics Manual](#), Turkish Airlines Inc. expects its suppliers to treat their employees with dignity, respect, and fairness regardless of race, color, religion, gender, age, and create an inclusive work environment.

As stated in articles 5.2 Discrimination and Harassment and 5.3 Reporting Discrimination and Harassment of the [Code of Ethics Manual](#), Turkish Airlines Inc. does not tolerate discrimination. It also expects its suppliers not to tolerate discrimination based on race, national or social origin, caste, birth, religion, disability, gender, family responsibilities, marital status in recruitment, remuneration, access to training, promotion, dismissal, or retirement.

Turkish Airlines Inc. expects its suppliers to listen to the complaints of their employees, and establish an appropriate communication and complaint method to resolve them.

Child Labor and Illegal Employment

Turkish Airlines Inc. expects its suppliers to comply with the national and international legal and other requirements regarding the use of child labor. It expects to comply with the minimum employment age limit defined by law or





Supplier Code of Conduct Policy

regulation and the relevant International Labor Organization (ILO) standards in accordance with the legislations of all countries where it operates.

Forced Labor, Modern Slavery, and Human Trafficking

Under the roof of Turkish Airlines Inc., no one may be forced to work without their own consent and by preventing them from exercising their legal rights.

Turkish Airlines Inc. expects its suppliers not to force anybody to work without their own consent, by preventing them from exercising their legal rights and not to employ illegal person. It expects them to take necessary actions against modern slavery, including human trafficking, forced labor, and involuntary servitude.

Wages and Working Hours

Turkish Airlines Inc. expects suppliers to pay their employees the minimum wage determined by the laws in the regions where they operate, and comply with the legal working hours.

It expects them to make sure that all rights determined by labor law and the other relevant legislations, which the employees will benefit from, especially annual leave, overtime, and maternity leave, are used in accordance with the laws and regulations.

Compliance with Sanctions and Trade Restrictions

Turkish Airlines Inc. attaches importance to complying with all applicable economic and trade sanctions, the laws and regulations related to export and import restrictions, especially the United States and European Union sanctions and export restrictions legislations which the transfer of certain technical data, equipment, and technologies between countries is subject to. It expects its suppliers also to understand the export control laws and economic sanctions requirements of the countries where they operate, and carry out their export activities in each country in accordance with the applicable laws and regulations. The other liabilities related to sanctions and trade restrictions are available under 3.5 International Business Restrictions heading of the [Code of Ethics Manual](#).

Bribery and Corruption

The Bribery and Corruption subject is covered under 3.2 Bribery and Corruption heading of the [Code of Ethics Manual](#). According to this regulation, Turkish Airlines employees or third parties may not be provided with bribery, commission, exemption, or any other benefit under any other name whatsoever. It also expects its suppliers not to offer or accept bribes, kickbacks, or gifts or payments that could be perceived as illegal, improper, or unauthorized payment.

In line with the regulations of the [Code of Ethics Manual](#) Chapter 3 Rules for Market Related Matters, the suppliers must not be involved in any action related to corruption, abuse or money laundering. It expects its suppliers to implement zero tolerance practices in this regard, and in particular, to carry out the necessary investigations and an appropriate risk management planning within the scope of any business initiative they will provide to Turkish Airlines Inc.

Turkish Airlines Inc. expects its suppliers to refrain from using gifts, entertainment, or other commercial hospitality to gain an unfair competitive advantage, and from the entertainment activities that do not comply with the applicable laws, and exceed their purposes. The Acceptance of Gifts, Invitations, Credits, and Other Favors is covered under 4.9.3 Acceptance of Gifts, Entertainment, Loans, or Other Favors heading of the [Code of Ethics Manual](#).





Supplier Code of Conduct Policy

Conflict of Interest

The Conflict of Interest subject is covered under 4.9 Conflict of Interest heading of the [Code of Ethics Manual](#). It expects its suppliers to take the necessary measures to ensure that they do not have any personal interests in their relations with Turkish Airlines Inc. and that the supplier's duties towards Turkish Airlines Inc. do not conflict with each other, or that there is no situation that may be perceived as a conflict of interest by the third parties. In the event of a potential conflict of interest, Turkish Airlines Inc. expects the supplier to notify all the affected parties promptly.

Fair Competition

While carrying out its activities, Turkish Airlines Inc. encourages fair competition and supports the development of competition law in line with the regulations in the Chapter 3 Rules for Market Related Matters of the [Code of Ethics Manual](#). In this context, it expects all its suppliers to act in accordance with the local laws and international standards, and stay away from the activities restricting competition, unfair competition methods, and deceptive acts.

Occupational Health and Safety

All companies serving Turkish Airlines Inc. are liable to comply with the rules specified under the Occupational Health and Safety Law No. 6331 and its related regulations and the heading 6.1 Providing Work Safety and Protection of Environment of the [Code of Ethics Manual](#) in line with the national and international legislation and the rules and regulations of the Company. It encourages its suppliers to hold ISO 45001 Occupational Health and Safety Management System Certificate or an equivalent certificate.

Turkish Airlines Inc. expects its suppliers to take all preventive and protective measures to prohibit work accidents and harm to employee health, to support activities to raise safety awareness, and to work towards reducing work accidents and occupational diseases.

Protection of Environment

Turkish Airlines Inc. expects its suppliers to comply with the Environmental Legislation, national and international requirements that they are obliged to comply with while carrying out their activities, products and services, and to adopt a proactive approach towards minimizing environmental impacts. It encourages its suppliers to hold ISO 14001 Environmental Management System Certificate or an equivalent certificate to eliminate, minimize, and keep their significant environmental impacts under control.

Turkish Airlines Inc. expects its suppliers to comply with the commitments set forth in the [Environmental Policy](#) and [Sustainability Policy](#), and the rules set forth under the heading 6.1 Providing Work Safety and Protection of Environment of the [Code of Ethics Manual](#).

Keeping Books and Records Correctly

Turkish Airlines Inc. expects its suppliers keep any books and records, including all financial transactions and information regarding their business activities, work, health and safety, and environmental practices, and the reports, presentations, financial statements, and footnotes to be submitted to the competent authorities correctly, completely, and transparently in accordance with the relevant laws, policies and procedures. Other issues related to keeping books and records correctly are included under the [Code of Ethics Manual](#) heading 4.1 Maintenance of Account Books and Records.





Supplier Code of Conduct Policy

Protection of Personal Data and Confidentiality

Turkish Airlines Inc. stipulates its suppliers to take the necessary measures in compliance with the principles, rules, and procedures prescribed in the national and international personal data protection legislations it is subject to, the Personal Data Protection Law Number 6698 in particular, and including the European Union General Data Protection Regulation. The regulations regarding the protection of personal data and privacy are included under the [Code of Ethics Manual](#) headings 4.6 Confidentiality of Personal Data and 4.7 Privacy Laws.

It expects its suppliers to take care of any information that belongs to Turkish Airlines Inc. such as trade secret, critical data, confidential information, and personal data in compliance with the relevant legislation, and take any technical and administrative measures to ensure the security level required to retain such information in compliance with the relevant legislative provisions.

The supplier signs the contracts and protocols to be sent to him/her by Turkish Airlines Inc. to provide the necessary protection regarding the processing of personal data and confidentiality. In the event that the suppliers outsource the service to be provided to Turkish Airlines Inc. to third party companies, Turkish Airlines Inc. expects the relevant companies to undertake protection to the same standard, and make the relevant third parties sign the contracts and protocols that comply with the legislation on the protection of personal data.

Turkish Airlines Inc. expects its suppliers to prevent unlawful access to any data by its employees or third parties as well as the unlawful use of the related data other than for the purpose of their transfer.

It expects the suppliers to transfer the personal data of their own employees and subcontractors, if any, that they transfer/will transfer to Turkish Airlines Inc. by providing a legal infrastructure in accordance with the relevant legislation.

Turkish Airlines Inc. expects its suppliers to take commitments regarding confidentiality and access to personal data from its own employees and subcontractors, if any, who have/will have access to personal data under the responsibility of Turkish Airlines, and provide periodic training to their employees on the protection of personal data and information security.

The supplier knows that it is responsible for the damages that may arise as a result of the activities of its employees or sub-contractors, if any, in violation of the personal data protection legislation.

Information Abuse

As specified in article 4.8 Insider Trading of the [Code of Ethics Manual](#), Turkish Airlines Inc. does not tolerate the use of any important information or information not disclosed to public for trading or allowing trading of any company's shares or securities by others by the suppliers.

Reporting

This Policy, which we as Turkish Airlines Inc. have published, is a brief guide, and does not cover all the necessary legal and ethical standards. In case of any violation of this document or other applicable legislation, Turkish Airlines Inc. expects the suppliers to report this situation to us immediately. This reporting can be done through the supplier's purchasing contact person or the ethical violation reporting channel etikkurul@thy.com. Turkish Airlines Inc. may reconsider its relationship with a supplier that does not comply with the Supplier Code of Conduct Policy and fails to meet the minimum requirements.

