



MNG
AIRLINES

MNG HAVAYOLLARI İŞ ETİĞİ VE DAVRANIŞ KURALLARI

MNG AIRLINES BUSINESS ETHICS AND THE CODE OF CONDUCT

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FOREWORD

My dear colleagues,

MNG Airlines, which was established in 1996 with completely domestic capital, has a reliable name in all the countries where it operates and in all the institutions and organizations it works with. Our reputation in the industry, which we have left behind for 25 years, is built on our strong ethical values. I would like to thank you for achieving a sustainable success with our ethical values.

Our ethical culture is formed by our way of doing business and our business ethics, and our ethical culture directs all our activities. The values written in MNG Airlines Business Ethics and the Code of Conduct are not new to us. These rules are the basis of the ethical culture that brought MNG Airlines to where it is in a quarter of a century. And our commitment to stick to this culture is once again shared in writing in this document.

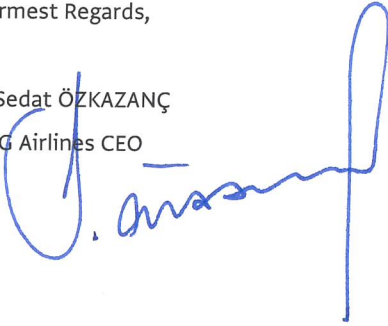
On this occasion; I share our ethical rules in writing with office or frontline personnel, flight crews, subcontractors, suppliers and all our business partners. I want you to remember that our priority is to do our job right and ethically, in all the countries in which we operate and in all our business lines.


I sincerely congratulate you who built our ethical culture and wish our success and reputation to grow and increase with our business ethics.

Thank you for your commitment,

Warmest Regards,

Ali Sedat ÖZKAZANÇ
MNG Airlines CEO

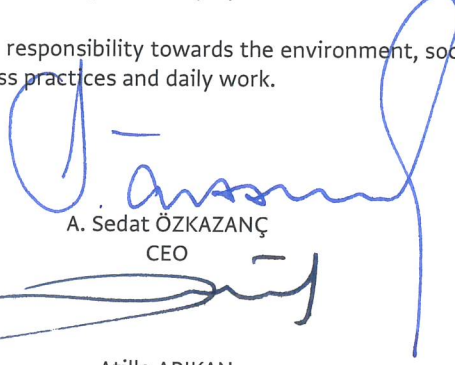


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1. MANAGEMENT'S COMMITMENT

As MNG Airlines Board of Directors and all managers we are committed that;

- We have adopted the code of conduct and ethical principles set forth in this document and will protect these values,
- In order to maintain the existence of a corporate culture based on trust and honesty and to make our company's continuous success, the MNG Airlines Business Ethics and the Code of Conduct document will be binding on all MNG Airlines' departments, managers and employees, business partners, suppliers, customers and their employees with whom it has a business relationship,
- We will act in accordance with laws, rules and international standards while carrying out our current activities,
- We will work to create a working environment that supports the Code of Conduct in order to fulfil our company goals, ensure safety and customer satisfaction,
- We will work to effectively implement the special Code of Conduct that can be formed within the framework of MNG Airlines Business Ethics and the Code of Conduct and to create a culture in which this is supported,
- We will ensure that Business Ethics and the Code of Conduct and all relevant policies are announced to MNG Airlines employees,
- We will be responsible for providing job security if the employees who make the notification make the right and correct notifications,
- We are aware of our special corporate responsibility towards the environment, society and our employees and we will clearly demonstrate this in our business practices and daily work.


A. Sedat ÖZKAZANÇ
CEO

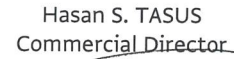

Ali ŞİMŞEK
Financial Director

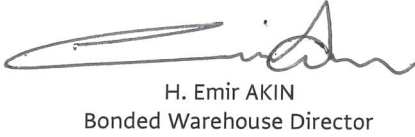

Atilla ARIKAN
Planning and Coordination Director


Burak KÖSE
Flight Training Director


Bünyamin TÜRKÖĞLU
Flight Operations Director

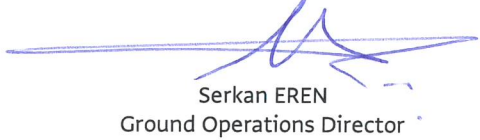

Fatih GÜLER
Quality and Safety Director

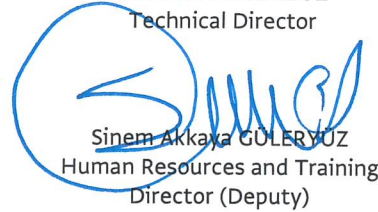

Hasan S. TASUS
Commercial Director

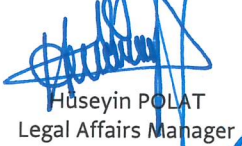

H. Emir AKIN
Bonded Warehouse Director


Mehmet EYİĞÜRBÜZ
Technical Director


Ufuk ÇOBAN
Purchasing and Contracts Director


Serkan EREN
Ground Operations Director


Sinem Akkaya GÜLER
Human Resources and Training
Director (Deputy)


Hüseyin POLAT
Legal Affairs Manager


Gamze Ete KURAN
Sanction Compliance Manager


Selin Elif KÜNTAY
Security Manager


Semih ELBİR
Emergency Response Manager


Yüksel YILMAZ
IT Manager

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2. INTRODUCTION

As MNG Airlines; We aim to be a company that complies with all legal regulations and standards while prioritizing customer satisfaction and will guide air cargo transportation in the world.

Globally; We aim to be a symbol of reliability, continuity and respectability for our employees, customers, suppliers and business partners.

Ethics, in the most general sense, is about morally right - wrong or good - bad. The life and development of a society in order can be ensured in line with ethical principles and rules. It is the "code of conduct" that ensures the order and continuity of our business life, which is a reflection of our social life.

In order to progress in line with these goals, our company has determined the rules of conduct to guide its employees and those acting on behalf of the company in their decisions and behaviours while performing their duties.

Our Code of Conduct sets out the basic ethical values and professional principles we must adhere to in order to achieve these goals and objectives. Business Ethics and the Code of Conduct and its content should be at the foundation of our day-to-day business and operating activities and all our relationships with our shareholders, colleagues, customers, suppliers, partners and other interest groups.

Business Ethics and the Code of Conduct aims to cover all the various areas of our business and operations as broadly as possible. It should be used as a guide in ethically or legally sensitive situations that we may find ourselves facing in our international working world. Our adherence to the provisions of business ethics and the code of conduct will support us maintain the safety, quality and sustainability of our company and its operations.

Each of us is the representative of the MNG Airlines brand. Therefore, it is essential that we all act at all times in a lawful, ethical manner, with full and due respect for the environment, and uphold our MNG Airlines values and principles in everything we do.

Our senior management, all our employees and stakeholders are responsible for the effective implementation of the rules of business ethics and the creation of a culture in which this is supported.

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3. COMPLIANCE WITH THE RULES AND OUR RESPONSIBILITIES

Our code of conduct is an essential element in maintaining the reputation and success of MNG Airlines. Therefore, behaviour that does not comply with Business Ethics and the Code of Conduct is never acceptable. As employees, each of us has to show the necessary common sense and effort, take into account the principles of profitability and efficiency, and avoid any action and behaviour that will harm MNG Airlines while performing our duties.

Within the scope of our duties and responsibilities we have to:

- behave in accordance with our company values,
- act in accordance with the documents published by MNG Airlines,
- be complied with all regulations issued by aviation authorities and other authorities,
- act for the benefit of our country and the world in accordance with the principles determined by the United Nations Global Compact signed by MNG Airlines,
- Complete and successfully pass the training activities required by MNG Airlines within the specified time,
- act within the framework of the OHS rules published by our company.

As MNG Airlines, we always act in accordance with legal regulations and international agreements in order to carry out responsible and ethical business practices. As a company, we comply with the laws and regulations in all regions and countries. Just like our company, we expect all employees of MNG Airlines to fully comply with all applicable laws, rules and regulations wherever our company's activities are carried out. Our employees may not use a contractor, consultant, agent or other third party to do anything they are prohibited from doing. Our employees must report any violation of law or regulation to a Manager, the Ethics Committee.

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4. CORPORATE MANAGEMENT PRINCIPLES

The core of all management functions and decision mechanisms of MNG Airlines is the Corporate Governance principles, which consist of corporate fairness, transparency, responsibility and accountability.

- As MNG Airlines, we show equal and fair behaviour to all parties (shareholders, stakeholders, employees, society, etc.) with whom we have a relationship, in accordance with the Corporate Fairness Principle.
- In accordance with the principle of corporate transparency, our company shares accurate and understandable information with all stakeholders. As MNG Airlines, we inform our stakeholders about all kinds of risks related to their future plans and business strategies. Our company is open and willing to provide clear and concise information to shareholders and other stakeholders.
- The Principle of Corporate Accountability expresses the obligation and responsibility of our company to explain or justify its business and transactions. In this context, our company ensures that the performance of the senior management is monitored independently by the Board of Directors and that the senior managers are accountable to the shareholders.
- As MNG Airlines, we carry out our activities in accordance with laws, regulations and other relevant issues and standards that reflect social values, while creating value for shareholders within the scope of corporate responsibility principle. Our Board of Directors has been authorized to act on behalf and account of our company.

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5. OUR CORPORATE RESPONSIBILITY PRINCIPLES

5.1. Human Rights

As MNG Airlines, we are committed to carry on our business in a way that respects the human rights and dignity of all people. As a company, we support studies that will contribute to economic and social development. In addition to our company's approach and policies regarding human rights, compliance with legal regulations and requirements must be ensured within the framework of the United Nations Global Compact, the Turkish Human Rights and Equality Institution Law and documents prepared by MNG Airlines.

We adopt responsible workplace practices and seek to conduct our business activities free from complicity in human rights violations. This applies to everyone we interact with, including our company, our employees, third-party representatives (eg, suppliers, subcontractors and employees).

If it becomes aware of a violation of the rules on human rights or an action to conceal this violation, it must be reported in accordance with established procedures.

5.1.1. Diversity and Inclusion

As MNG Airlines, we see our employees as our main strength. We encourage an inclusive work environment that values diversity, where everyone feels accepted and can do their best every day.

As MNG Airlines; We expressly reject any form of discrimination based on gender, ethnic or national origin, race, colour, religion, age, disability, sexual orientation and identity, or any other characteristic protected by law.

At MNG Airlines, we do not tolerate any form of violence, including but not limited to threatening and intimidating behaviour in workplace. We encourage all our employees to contribute to an atmosphere of respect that prevents any form of workplace harassment; including bullying, unwanted sexual advances, unwanted physical contact, inappropriate offers or a work environment tainted by derogatory jokes, words or derogatory comments.

5.1.2. Recruitment and Promotion

As MNG Airlines, skills and qualifications have been determined as the main criteria for employee recruitment and promotion. As MNG Airlines; In all aspects of employment, such as hiring, compensation and benefits, training, promotion, transfer and dismissal, we treat individuals in a fair and non-discriminatory manner on the basis of their ability to meet the requirements and standards of their role.

Employee candidates' job applications are based on confidentiality. Therefore, only the applicant is informed about his/her application.

It is acceptable for our company to have relatives (spouses, relatives, etc.) of the employee candidates with the people working in the company or to declare the relatives of our employees as candidates. The candidate can be accepted for the job provided that he/she meets the following qualifications;

- If the candidate complies with the required qualifications in the job description,
- Spouses, relatives etc. and current employee' business processes do not directly conflict (performer-controller, subordinate-superior, etc.)

Our managers who make the decision to recruit cannot hire their spouses, close relatives or relatives of these people without the knowledge and approval of the General Manager. They do not take part in the promotion or award decision process of their relative in MNG Airlines and cannot be effective.

5.1.3. Sustainable Employee Engagement

As MNG Airlines, we believe that the motivation and commitment of our employees is an important differentiating factor in our industry and makes a significant contribution to our business success. For this reason, mutual respect has been determined as a part of our common values. We engage constructively with fair and open discussions and divergent views to ensure we achieve our common goals reliably.

5.2. Occupational Health and Safety

Our company aims to prevent occupational accidents, eliminate or minimize risks and work with sufficient workforce through occupational health and safety practices.

All of our employees must comply with the safety and security rules determined inside and outside the company in order to use

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the personal protective equipment determined by our company and provided to the employees at a sufficient level and to prevent accidents while leaving or going to the workplace.

Each of our employees must report any situation that may carry risk to safety and security through the Incident Reporting System.

5.3. Environment

As MNG Airlines, we are committed to maintaining our activities in an environmentally and socially sensitive manner, and we support activities that will contribute to economic and social development and environmental protection. In order to manage risks related to the environment, it is always aimed to carry out reliable, comprehensive practices that comply with legal regulations and requirements.

As MNG Airlines, we try to minimize its activities that may have a negative impact on the environment, and we expect all our employees to take an active role in protecting the environment. Our company encourages activities related to the protection of the environment and climate, the correct use of natural resources and the development of environmental awareness.

If an employee becomes aware of a violation of environmental protection laws or an action to conceal this violation, they must report it in accordance with established procedures.

We must also fully fulfil our social and ecological responsibilities by developing a respectful attitude towards people and the environment.

Our employees must act in accordance with the MNG Airlines Environmental Policy, which was created together with the Environmental Management System practices carried out within this scope.

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6. OUR BUSINESS RELATIONSHIP PRINCIPLES

6.1. Misconduct

Our employees should not use the rights, responsibilities and authorities given according to the job description for their own benefit. In the performance of his duties, he/she must refrain from immoral, illegal acts or behaviour. We should be honest, fair and reliable and should pay attention to ethical values.

Our employees should not use their titles and authorizations to gain benefits on behalf of themselves, their relatives or third parties. Our employees should not use company information and resources to use any opportunity that may be of interest to the company for their personal benefit.

6.2. Accounting and Reporting

All information recorded or reported on behalf of our company, both for our purposes and to third parties, must be accurate.

All our company's financial records, including accounts and financial statements, must comply with applicable accounting standards, be kept in a timely manner with reasonable and appropriate details, and accurately and appropriately reflect our transactions. Falsifying records or keeping unrecorded funds and assets is never acceptable under any circumstances and may result in dismissal and/or prosecution. Once a payment is made, it can only be used for the purpose for which it was approved. Documents and reports must contain necessary information regarding all transactions and must be maintained in accordance with corporate guidelines and applicable laws and regulations.

6.3. Anti-Bribery and Anti-Corruption

As MNG Airlines, we do not tolerate bribery, corruption or any form of improper payment in business dealings anywhere in the world. Engaging in such behaviour exposes us as individuals and MNG Airlines as an organization to legal and/or criminal liability. It can also damage our corporate reputation and undermine the trust of our customers, shareholders and communities.

As MNG Airlines employees;

- We must not offer or accept any form of bribe, illegal commission payments or other improper payment, including facilitation payments, directly or indirectly through others.
- We must accurately reflect all payments and transactions made in the accounting records and books.
- If we become aware of or suspect a corruption violation, we must immediately report the situation to the ethics committee.

Our company stops the recruitment process of the candidate if it is revealed that the candidate has committed crimes such as bribery, corruption and fraud in the previous workplaces during the background check of a candidate during the recruitment process.

Other details regarding anti-bribery and anti-corruption are available in the DD-220 MNG Airlines Anti-Bribery and Anti-Corruption Policy Document.

6.4. Gifts, Corporate Hospitality and Other Benefits

Our company and its employees establish relationships based on trust, transparency and legal cooperation with the people or companies they do business with. Accepting or offering inappropriate gifts on special days between our employees and the people they do business with, participating in luxury invitations and travels may damage our company's reputation. As MNG Airlines employees; we should not accept gifts and invitations other than gifts of reasonable value, normal business lunches/dinners and entertainment activities. However, even such gifts of reasonable value, meals and entertainment should only be accepted if they are not given regularly or frequently.

It is obligatory that the costs and expenses to be incurred for gifts, meals and entertainment activities given to business persons are reasonable and recorded in the company's accounting records fully and accurately.

The general principles that our employees must comply with are listed as follows:

- While doing your work, care should be taken not to affect or affect your performance and objective decision making; profits or gifts of any kind must not be made.
- Gifts can be given/received if the following conditions apply;
 - If the gifts are in line with the company's business objectives,
 - Comply with applicable laws and regulations, and
 - If the gift will not cause a disgraceful situation for MNG Airlines if it is made public.
- As a result of participating in seminars and similar organizations on behalf of MNG Airlines, awards such as symbolic,

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non-monetary awards and plaques can be accepted on behalf of the company.

- Giving a gift should not create the perception of offering an improper payment or commission.
- Giving or receiving the gift must be based on reasonable grounds.
- Gifts can be given to third parties on behalf of the company in line with the principles determined by the Managing Director at New Year's Eve and on holidays.
- Should not solicit gifts from customers, subcontractors and suppliers, and should not even be hinted at.
- Gifts of cash or cash equivalents should not be accepted or borrowed from suppliers, consultants, competitors or customers.

In the conduct of business relations with the public administration, the relations determined by the legal regulations should not be exceeded, and in this context, issues such as making any payments, giving gifts or making offers should be avoided in order to gain an advantage contrary to the laws and regulations, and to influence the decision of individuals or institutions. Gifts to be given to public administration officials must be in accordance with the courtesy rules that can be accepted by public administration officials, especially the Public Ethics Legislation. In this context, the approval of the Managing Director must be obtained for all kinds of gifts to be given to public administration officials or public institutions.

Other details regarding gifts, corporate hospitality and other benefits are specified in the DD-220 MNG Airlines Anti-Bribery and Anti-Corruption Policy Document.

6.5. Conflicts of Interest

6.5.1. Disclosure of Conflict of Interest

Conflict of Interest; is the state of having any kind of benefit provided to them or the people they are in contact with, or having any material or personal interest related to them, which affects or seems to affect the impartial and objective fulfilment of their duties by the company employees. Conflicts of interest can occur in three types:

1. *Realized conflict of interest:* The employee is in a position to be influenced by his private interests in the performance of his duties;
2. *Perceived conflict of interest:* While performing his duty, the employee appears to be under the influence of his private interests by those around him. Perceived conflicts of interest refer to an opinion that has not actually occurred, but has occurred within the organization or in the public. Employees who realize that such perceptions may harm the reputation of the institution are expected to inform their managers or the Ethics Committee.
3. *Potential conflict of interest:* The employee is in a position to be influenced by their private interests while performing their duties in the future. Although potential conflicts of interest have not made an impact yet, they signals to positions that may turn into "realized conflicts of interest" in the future and action should be taken at the stage they are noticed.

While performing their duties, our employees should avoid situations and relationships that will involve real or potential conflicts between their interests, those of their contacts or their families, and the interests of the company.

As MNG Airlines employees, our responsibilities and the behaviours expected from us are as follows;

- If there is a potential conflict of interest that could affect our judgment and actions, this should be reported to the department manager. Even in the absence of malicious intent, the appearance of a conflict of interest can have adverse effects. For this reason, to take into account how our intention looks and when you hesitate, you should consult our manager. In cases where you cannot resolve with your manager, you should consult the Ethics Committee.
- A "conflict of interest" may arise when we put our personal, social or financial interests ahead of company interests. If there is any situation that you think may become a conflict of interest or that you learn later that it has created a conflict of interest; you should immediately share it with your manager. Giving such an impression may damage our or our company's reputation. We may also be required to disclose potential conflicts of interest, if any, when we are asked to demonstrate that we know and comply with the standards in this Business Ethics and the Code of Conduct.
- Any employee of our company; is in any position of a competitor, customer, supplier or any organization; should avoid this situation if his position in our company affects his financial partnership or business relations.

Additional information regarding conflicts of interest is available in DD-220 MNG Airlines Anti-Bribery and Anti-Corruption Policy Document.

6.5.2. Owning or Working in Other Companies

As the company, we do not accept any of our employees to work in any other job that may adversely affect their performance in their current job. If he/she does not neglect his responsibilities to our company due to the work he does for the company he works for or is entitled to, our employee can continue his business relationship by informing his managers and the Ethics Committee.

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Our company respects our right to managing our investments as you wish and does not want to interfere with our personal lives. However, we are also responsible for avoiding situations that may create a possible conflict between our own interests and the interests of the company, or that may create such an impression.

Our employees can work in political parties, non-governmental organizations with the knowledge of their managers and the Ethics Committee, without making a profit, in a way that will not affect their current job performance. As MNG Airlines employees, it is known that the top management must be informed and approved before joining political parties as a manager and/or running for elections to assume public office.

6.5.3. Financial Conflicts of Interest

Our employees never accept or pay bribes, including payments, to make things easier. Our employees should not make, solicit, or accept any personal payment in exchange for favourable treatment or for commercial gain. Our employees are obliged to immediately notify their managers of any unlawful behaviour, suspected bribery and corruption. In addition, the following situations should be avoided;

- Participation of our employees' relatives in the tenders opened by our company.
- Our employees have a financial relationship with their suppliers or customers.
- Our employees or their relatives have a property and interest relationship with competitor companies or with vendors and customers with whom they have business relations.

6.5.4. Resolution of Conflicts of Interest

If an employee is involved in a potential conflict of interest, information about the conflict should be reported to the Ethics Committee. The situation resulting in a potential conflict of interest should be known and resolved by the MNG Airlines Ethics Committee. Our employees should refrain from participating in matters of interest or in decisions taken.

6.6. Anti-Money Laundering and Terrorist Financing

At MNG Airlines, we are committed to full compliance with all applicable anti-money laundering and anti-terrorism financing laws and only accept funds from legitimate sources. In addition, our company only engages in business relationships with customers who engage in legitimate business activities.

In addition, our company refuses to do business in a way that helps or facilitates tax evasion by our suppliers, customers or other third parties.

6.7. Fair Competition

As MNG Airlines, we believe that fair competition is one of the most fundamental principles of a properly functioning market that contributes to development, improvement and the welfare of the society. Our company aims to meet the needs of our customers faster, better and more differently than our competitors. Therefore, as MNG Airlines, we carry out all our activities in line with the principles of strict and fair competition within the framework of competition laws, being aware of the fact that we compete with many companies. Actions that violate the competition law are not deemed appropriate by our company and all of our employees are requested to comply with this rule.

6.8. Sanctions and Compliance Policy

As MNG Airlines, we avoid all kinds of commercial transactions and activities that may give the impression of money laundering within the framework of national and international rules. Before entering into a business relationship with third parties as a company, it makes the necessary due diligence to get to know the relevant party; we do not establish business relations with third parties about whom we do not have sufficient information or about whom there is negative intelligence, who pose a risk or create suspicion for these and various other reasons.

As a globally operating company in the airline industry, we take the necessary measures to comply with regulations regarding economic sanctions and export controls. If our company does not establish a commercial relationship with the persons on the embargo and sanction lists, and if the obligation to establish direct or indirect contact has arisen, approval must be obtained from the Sanctions Compliance Department and the Legal Affairs Department before making contact. Other details on Sanction Compliance are available in the PR-105 Sanctions Compliance Policy and Procedure document.

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7. OUR ASSET MANAGEMENT PRINCIPLES

7.1. Company Assets

Our employees must protect and use company assets (e.g. computers, e-mail services, data, tools, equipment, materials, etc.) properly. The basic principle is that company assets are not used for direct personal gain or for the benefit of a person or institution other than the company. Theft and use of company assets outside of the limits specified herein may result in internal disciplinary actions, and criminal prosecution if defined by law. Assets belonging to other employees in the workplace are also considered as company assets in case of theft or unauthorized use. The direct or indirect use of company assets should not turn into personal financial income.

Our employees should preserve and operate the company asset properly (ex. computers, e-mail services, data, equipment, tools, etc.). The main principle is, to not to use the company asset on the advantage of oneself or any third party person-company. Theft of the company asset or usage of it beyond the defined limits, could require in-company discipline proceeding or if the occurrence is a defined crime, criminal proceeding can be needed. Theft or usage without permission of any personnel belongings are also valued as company asset. Direct or indirect usage of the company asset must not convert to personal earnings.

7.1.1. Business Hours

Business hours should be used to fulfil work-related responsibilities.

Engaging in personal activities during business hours should not result in impeding the job responsibilities or reducing the quality of work.

7.1.2. Company Materials, Equipment

Materials and equipment can be given for personal use of our employees for a use that complies with the following conditions, with the approval of our employee's manager and the manager responsible for materials/equipment.

- Material or equipment should not be consumed due to use, and should not require maintenance.
- The absence of materials or equipment should not hinder work.
- The use of material or equipment outside the company should not constitute a legal obstacle, and should not impose a legal or financial responsibility on the company for its use.
- Our employee who will use the material or equipment must have the ability to use it.
- Damage to material or equipment must be at a cost that is payable by the person.
- Materials or equipment should not be left for use or control by third parties.
- No direct financial benefit should be derived from external use of material or equipment.
- The use of materials and equipment should not be continuous.

7.1.3. Company Vehicles

Company vehicles include passenger vehicles allocated to executives with or without a driver for personal use, and vehicles used by company drivers for common use, meeting their work-related transportation needs.

Commercial profits cannot be obtained from the passenger vehicles allocated to our employees for personal use. These tools cannot be assigned to third parties. The tools can be used by 3rd parties if the person is with them in order to support the use of the person. Company vehicles can be used for MNG Airlines employees with the approval of their managers.

No personal commercial gain can be made with tools available for common use. These vehicles cannot be used without a driver. Vehicles bearing the MNG Airlines logo indirectly represent the corporate identity of our company. Consequently, in these vehicles, traffic rules must be followed and other vehicles and people in traffic should be treated with respect. All behaviour that could be considered negative, including smoking, by third parties must be avoided.

7.1.4. Computers, Software, Communication Tools, Copiers etc.

Computers, software and communication tools are used to carry out business processes in our company, to support these processes and to ensure communication. Therefore, their use should also be for business purposes. Personal use is possible within acceptable limits. Personal or business use must not be in a way that harms other company assets. Details and usage examples on this subject are given below.

Can I keep my private files on the computer?

Computers provided to our employees should be used to perform business processes in our company.

Is personal use of photocopiers possible?

Reasonable use is acceptable. For example, you can photocopy your child's birth certificate, but you should not copy the

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textbook.

What are the limits on the use of E-Mail?

The use of e-mail is provided by the resources owned by the company or used by contracts or under its control. In addition to having a financial reward for the use of these resources, their misuse may put the company under liability. The e-mail account provided by our company can be used in business-related matters.

Avoid using your mngairlines.com e-mail addresses for your private business, instead you should use other sources that offer e-mail service. Do not use your private e-mail addresses in business-related matters.

The e-mails you send must not contain illegal, pornographic, or topics that may hurt third parties due to differences such as religion, language, race, gender, political views, and may lead to intolerance or hatred.

7.1.5. Documents, Records, Data

Documents created, used and published within our company, as well as records and data belonging to the company and its employees are considered as company assets.

7.1.5.1. Employee Information

The privacy of our employees, employee candidates, personnel working for our suppliers and service providers, whose limits are determined by the relevant legal regulations or company procedures and related practices, is among the most important priorities of our company, and our company does its best to comply with all applicable legislation in this regard.

As MNG Airlines, we take the necessary administrative and technical measures to prevent unlawful processing of personal data, illegal access to personal data, and increase awareness to ensure the protection of personal data, provide our business units with the necessary training, set up the necessary follow-up systems, and provide consultants in case of need. We work with and follow the current legislation.

The following examples are given as examples of basic approaches to this issue.

- Example 1: If a person you don't know calls you by phone and asks for the contact information of an employee named, do not provide this information. You can say that this person can get the contact information and forward it to our employee so that he or she can contact him.
- Example 2: Avoid transferring information that may cause people working in the company to use their phone numbers, e-mails, and third parties and companies to use their products or services for marketing purposes.
- Example 3: Information about employees' salaries and other personal rights is confidential. If you access this information due to your position and function in the company, do not share it with other people. If you unintentionally, accidentally or exceptionally access this information, act similarly. Please forward the information security vulnerabilities you encounter to the persons responsible for protecting this information.

7.1.5.2. Company Information

Our employees may be in a position to obtain non-public information about our company or other companies. Care should be taken not to use non-public or "internal" information about our company or other companies outside of the normal performance of the employee's job, profession or position. This information includes, but is not limited to:

- Brands and other intellectual property of MNG Airlines, software or databases coded, found, developed by personnel, research results, advertisements, plans, business strategies, strategic partnerships, mergers and acquisitions, pending contracts and information on partnerships, financial information, earnings information, personnel information, customer lists, product creation process and product information, technical information, manuals, procedures, instructions, job descriptions, supporting documents, regulations, specifications, identity of potential or actual customers, information about suppliers, written, graphic or machine-readable information as well as bankruptcy and litigation.

Confidential information includes all information that the company has not made public. Confidential information includes product/service information, non-public financial information, business strategies, terms of agreement, employment and personnel information; information about our relationships with customers, suppliers or government agencies, and other information that gives the company a competitive advantage. We protect our confidential information as it is one of our most valuable assets for our company.

Confidential information should never be used for personal gain and should never be shared with others (including family members and friends) or anyone else at work who does not need to know. It should be noted that our responsibility to protect confidential information continues even after we are done.

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As MNG Airlines, we adopt the following principles regarding confidential information:

- All employees are obliged to keep confidential all non-public information that they learn about their job.
- Confidential information cannot be disclosed to anyone who does not work for MNG Airlines or has nothing to do with the business, without the necessary authorization.
- Confidential information cannot be changed, copied or destroyed. Necessary measures are taken to protect and preserve them. Changes made to the information are noted with their dates.
- Confidential files cannot be removed from MNG Airlines venues. For confidential documents that need to be removed from the office, the approval of the responsible person or senior management must be obtained.
- Passwords, user passwords and similar defining information used to access company information are kept confidential and not disclosed to anyone other than authorized users.
- Company's confidential information should not be discussed in restaurants, cafeterias, elevators, shuttles or similar public places.
- If company information is shared with third party persons and/or organizations in terms of company interests, a confidentiality agreement should be signed or a written confidentiality commitment should be obtained from the other party, in order to ensure that the parties are aware of their responsibilities in terms of security and protection of these assets before the confidential information is disclosed.
- Confidential information cannot be shared on social media.

7.2. Data Protection and Information Security

As MNG Airlines, we act in accordance with the legal regulations in the processing of personal data and take the necessary precautions. In this context, we act in accordance with the local and international legislation to which we are subject and the principles determined in the processing of personal data under all circumstances.

Our employees receive the necessary training on data security and know that failure to comply with regulations will affect not only the relevant employee or department, but the entire company. It is aware that acts that do not comply with the legislation may have many sanctions, including administrative fines, and that individuals may be held personally liable.

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8. RELATIONS WITH INSTITUTIONS, CUSTOMERS, SUPPLIERS AND SOCIETY

8.1. Representation of Company

The brand value and quality of our company also depend on the behaviour of our employees. For this reason, it should never be forgotten that the corporate identity of our company is carried in relations with other institutions. Since our employees are working at MNG Airlines, they must inform their managers and obtain approval before attending events such as meetings and meals to which they will be invited.

In addition, the approval of the managers should be obtained in order to attend conversations sessions in any organization, to participate in seminars and conferences as a speaker. No personal gain should be derived from such activities. Our employees receive symbolic awards, plaques, etc., given to them in memory of that day. However, each award given on behalf of the company is delivered to the company to be shared with other employees.

Our employees attend workshops, meetings, conferences, etc., for the purpose of informing or forming an opinion, organized by official institutions or associations. Before representing the company to the activities, he/she should get approval from his managers and inform other managers who may be related to the subject.

In private relations with institutions and competitors, care should be taken to act in accordance with company values and business principles, and not to disclose company secrets.

It should be known to all employees that correspondence, including e-mails sent on behalf of the company, or documents bearing the MNG Airlines logo will represent MNG Airlines. In these correspondences, attention should be paid to visuality and expression style, and there should be no issues that go beyond authority and responsibility in terms of content.

8.2. Media Relations

The relationship of all our employees with the media should be limited to giving information to the press and should be done through the persons and/or units responsible for communication as a way of protecting the image of our company.

On behalf of MNG Airlines, only persons authorized by the Managing Director and supported by the Corporate Communications Department can make statements or interview on behalf of our company in the media organization.

Our employees can only answer questions about their professional expertise in instant press encounters. Questions about controversial issues related to the sector's agenda should not be answered, and comments should not be made on these issues. Regarding private interviews, the Corporate Communications Department should be contacted first, and then questions should be asked from the members of the press and coordinated together.

Our employees, who are exposed to questions by phone or e-mail in case of an emergency or crisis, should say, “*You can talk to ... regarding the issue.*” and only provide guidance without any explanation.

8.3. Digital World and Social Media

Our company demands our employees to use social media and various communication tools responsibly and correctly. Our employees should use social media and communication tools in line with the Social Media User Guide published by our company.

As employees, we must also pay attention to what we share in our personal accounts, as it will not be possible for us to keep our personal accounts separate from the MNG Airlines employee identity. In this context, we must take great care to ensure that it complies with the regulations on intellectual property and copyrights on personal rights, freedom of expression, information security, privacy.

8.4. Relations with Suppliers

Due to the nature of our activities, we often need to interact with third parties. To ensure that we work with third parties that have zero tolerance for corruption and influence trading, we conduct robust, risk-based, due diligence before engaging with a third party. Further details on due diligence are available in the PR-106 MNG Airlines Know Your Customer (KYC) & Customer Due Diligence (CDD) Third-Party Due Diligence Policy. In addition, we monitor our third parties to ensure that they are working to the standards we set throughout the business relationship and to provide the value they commit to our company.

The basic principles that our company and our employees must comply with when working with suppliers are listed as follows:

- When choosing a supplier, the supplier's business commitments, responsibilities, and product/service quality should be evaluated in line with company procedures.
- We execute our company's product/service agreements with third parties in line with the laws and company procedures. In this context, no one should be influenced by the selection of companies to do business with. Care is taken to always

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conduct our relations with suppliers within the framework of transparency, mutual trust, professionalism and efficiency. In the selection of suppliers, besides the company procedures, it is necessary to work with people who are honest, professional and have a good reputation in the market. We should not use non-public information about the people we do business for other than the purpose required by the business and should not be shared with third parties without permission.

- A supplier should never be offered “provision” or offered to withdraw any work or service in the course of business.
- First of all, it should avoid real or perceived conflicts of interest that may arise during the purchasing process, and should notify the Ethics Committee in cases where it is unavoidable.
- Select suppliers on the basis of a clear competitive bidding scheme based on objective measures in evaluating performance and service quality, and ensure that all supplier bids are compared and considered fairly and without favouritism.
- Be transparent about the bidding process and give honest and sensitive feedback to unsuccessful bids.
- Provide support to suppliers in meeting MNG Airlines' expectations – but have the courage to end relationships with suppliers that do not consistently meet expectations.
- In the Tender and Procurement phase, an employee who is authorized to evaluate bids in the Purchasing function should not be in financial partnership with one of the potential suppliers. In this case, the Ethics Committee should be informed and advice should be expected.
- It is not enough for the employees to comply with the ethical rules; Suppliers must also comply with ethical rules.

8.5. Corporate Security and Crisis Management

As MNG Airlines, we provide a safe working environment for our employees and protection against security threats and risks for our financial interests and assets. In this context, we implement crime prevention methods, and we also constantly monitor the global security situation and review our travel security standards. In emergencies, we ensure business continuity thanks to our crisis management capabilities.

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9. ETHICS COMMITTEE AND COMPLIANCE WITH THE RULES

9.1. Purpose of the Ethics Committee

MNG Airlines Ethics Committee was established to resolve conflicts of interest within the scope of business ethics, to evaluate notifications of violations of ethical rules and to advise on the ways, methods and practices to be followed in violations of ethical rules, and to carry out awareness activities on ethical issues.

The decisions of the Ethics Committee are recommendations presented to the senior management. In addition, the company management bears the responsibilities specified in this document in cooperation with the Ethics Committee.

9.2. Duties and Responsibilities of the Ethics Committee

- To encourage the ethical values specified in Business Ethics and the Code of Conduct to be protected and to be protected by the relevant parties,
- To evaluate every issue and notification regarding Business Ethics and the Code of Conduct,
- To organize training and meetings so that all employees understand the rules thoroughly,
- To guarantee the confidentiality of complaints and notifications made within the framework of Business Ethics and the Code of Conduct and Ethical Rules,
- To guarantee that complaints and notifications are investigated in a timely, fair, consistent and sensitive manner and to take the necessary actions decisively as a result of violations,
- To evaluate and document Business Ethics and the Code of Conduct and all relevant policies and announcing them to the employees with the approval of the company's senior management.

9.3. Duties and Responsibilities of Ethics Committee Members

- To forward, follow up, investigate and resolve the notifications delivered to them to the Ethics Committee,
- To inform the employees about Business Ethics and the Code of Conduct, to provide training in certain periods in order to ensure the clarity of the policies and rules, and to answer the questions and problems of the employees regarding the ethical rules,
- To establish and develop the ethical culture at MNG Airlines,
- To review the rules of conduct and to forward the necessary updates to the board in line with the opinions and suggestions and information provided to them in order to protect the compliance of the rules with the company's needs and target.
- To report the informed / reviewed / concluded cases to the Ethics Committee.
- To ensure the protection of employees by ensuring the confidentiality of the information of employees who report situations contrary to Business Ethics and the Code of Conduct.
- Any department employee and/or department manager should attend the meeting if required by the Ethics Committee.

9.4. Application to the Ethics Committee

At MNG Airlines, we maintain a speak-up culture within our company and encourage reporting of suspected violations of anti-corruption, anti-bribery laws and ethical principles. Each of our employees, managers, shareholders, business partners, suppliers; ask questions about these issues, seek guidance, report suspected violations and raise concerns about compliance with these rules. In this context, our company has been established a reporting hotline via ethics@mngairlines.com, in order to facilitate fast, confidential and anonymous reporting on these matters, open to the use of our personnel and everyone else, without fear of retaliation. This hotline is also announced on our website.

All persons who want to report suspected violations of anti-corruption, anti-bribery laws and ethical principles, or who want to inform the Ethics Committee or the Ethics Committee Members, make suggestions, seek opinions or consult on a specific situation regarding compliance with ethical rules,

- Can make an application to any of the Ethics Committee members by meeting face to face or via e-mail, or
- Can make an application to the Ethics Committee via e-mail at ethics@mngairlines.com.

9.5. Protection of Information and Information Provider

None of the Managers or Employees under an employment contract; May not engage in hostile acts and behaviour or harass any person, customer, supplier, contractor or employee who makes a statement affecting an employee or other person who makes a request or report by making an Ethical Application.

Any act of revenge, harassment or discrimination will be considered a serious violation of the Code of Ethics; therefore, the Employee's employment contract may be finally terminated after appropriate administrative process.

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No legal action will be taken against persons who report facts or irregularities in good faith and are subsequently rejected by investigation and verification.

With the exception of legal exceptions, no member of the Ethics Committee, Managers or Employees, who are aware of complaints or allegations while performing their duties, may not reveal them partially or completely.

9.6. Noncompliance Sanctions

Violation of the rules by executives (except members of the board of directors) and employees bound by an employment contract is considered a breach of contractual obligations.

Violations of the rules by suppliers and contractors are evaluated by the company and, if appropriate, sanctioned according to the terms of the contracts committed.