Media Port

Code of Ethics

Media Port

MESSAGE FROM OUR BOARD OF DIRECTORS

Dear colleagues and business partners,

Starting its journey in 2018, Media Port is a leading Istanbul-based airport advertising brand, backed by a quarter-century of experience from the Square Group.

As Media Port, our primary goals are to adhere to the principles of responsibility and sustainability in every area we operate and to connect the brands we collaborate with to our passengers through our leading and innovative approach in airport advertising.

With the addition of Riga Airport (RIX) to our portfolio in 2022, we made our first international investment, and in the first quarter of 2024, we strengthened our position in the industry by establishing our presence at Çukurova Airport (Adana-Mersin), leaving a lasting impression on airport passengers.

While taking all these successful steps, we acted with the awareness of the responsibility we carry towards all our stakeholders, from our employees to our customers, and from our suppliers to national and international authorities.

As an expression of this responsibility, we have prepared the "Ethical Code and Compliance Management Procedure" to establish our company's ethical standards and strengthen the understanding of ethics wherever our organization reaches. This procedure and code contain policies that embody our company's ethical understanding and ensure that all our stakeholders act in accordance with these principles.

In addition, to raise general awareness on issues related to combating bribery and corruption and ethical trade, we have implemented mandatory training programs for all our employees. The relevant training is designed to reinforce our organization's commitment to quality and integrity principles.

Our "Ethical Code and Compliance Management Procedure" serves as a guide that defines our way of doing business and reflects our management's commitments. We kindly ask you, our valued stakeholders, to carefully review this guide and apply it in your daily business processes.

We appreciate your strong commitment to our company's ethical values and thank you for your support in this regard.

Sincerely,

Media Port

1. Our Ethical Principles

As Media Port, we make a clear distinction between right and wrong to uphold and elevate our ethical standards, prioritize our moral values in every decision, and consistently promote fair and ethical behavior. These principles guide our decisions and actions, directing us in our relationships with all our stakeholders both within and outside the company.

- Perfectionism
- Sustainability
- Environmental Awareness
- Innovation
- Quality
- Transparency
- Innovativeness
- Continuous Improvement
- Social Contribution
- Integrity
- Fairness
- Responsibility
- Equality & Diversity

2. Our Behavioral Principles

• **Integrity:** We adhere to the principle of integrity in all our business and professional activities. We provide clear and accurate information without distorting the truth.
• **Transparency**: We are transparent in our decision-making processes and business relationships. We strive to be open and understandable when sharing information.
• **Fairness**: We treat all employees, customers, suppliers, and other stakeholders fairly and equally. We do not discriminate and treat everyone with respect.
• **Confidentiality:** We protect the confidentiality of company and customer information. We do not leak information to unauthorized individuals and comply with privacy principles.
• **Legal Compliance**: We act in accordance with all applicable laws, regulations, and industry standards in our business activities.
• **Conflict of Interest**: We do not allow our personal interests to conflict with the interests of the company. We disclose and manage conflicts of interest openly.
• **Professionalism**: We exhibit professional behavior and attitudes in the workplace and in our business relationships. We take care to maintain the company's reputation.
• **Responsibility**: We take responsibility for the decisions we make and the actions we take. We acknowledge our mistakes and take action to correct them.
• **Sustainability and Environmental Awareness**: We act responsibly towards the environment and support sustainable business practices.
• **Equal Opportunities**: We provide equal opportunities in hiring and promotion processes. We reject discrimination based on factors such as gender, race, religion, age, or sexual orientation.
• **Occupational Health and Safety**: We take necessary measures to protect the health and safety of our employees and provide a safe working environment.
• **Reporting and Notification of Violations**: We follow a clear policy for reporting ethical violations and suspicious behaviors. We provide mechanisms for employees to report violations safely.

• **Disciplinary Action**: In the event of violations of our ethical and behavioral principles, we apply sanctions fairly and consistently.

2.1. Purpose and Scope of Ethical and Behavioral Principles

Our Ethical and Behavioral Principles define the rules that Media Port employees and the individuals and institutions they establish professional relationships with must adhere to in all circumstances. Additionally, this document outlines the reporting procedures to be followed in the event of non-compliance with these standards.

2.2. Scope and Distribution of the Ethical Code

Our Code of Ethics is the moral compass of our organization and the cornerstone of how we conduct business. This document is communicated to every new colleague who joins us and is considered an integral part of employment contracts. The Ethical Code also applies to our relationships with suppliers, customers, shareholders, and all other third parties.

Therefore, our Code of Ethics is presented as part of agreements and contracts made with third parties in our business relationships, and these parties are expected to adopt and implement the principles and standards outlined in this document at every stage of our collaboration. The behavior of third parties in accordance with our company's ethical values and standards is fundamental to maintaining healthy and sustainable business relationships.

Our company takes the implementation of our Code of Ethics seriously and monitors it closely by all our stakeholders, taking necessary actions in the event of violations of this code. This commitment is not only to comply with legal regulations but also to adhere to the highest ethical standards, aiming to create a fair, respectful, and ethical work environment for all our stakeholders.

2.3. Rules and Regulations

Our company's global organization requires our employees to interact with a diverse range of cultural, social, and legal stakeholders. These interactions may be subject to the complex legal systems of different countries, making it essential for our employees to comply with both our internal ethical principles and local laws and regulations.

In the event of a conflict between our Code of Conduct and applicable national laws, national laws take precedence. However, the priority of laws does not mean compromising our company's ethical standards. On the contrary, it aims to ensure full compliance with legal requirements while maintaining the highest ethical standards.

In any situation of uncertainty or conflict, it is strongly advised that our employees consult our company's "Compliance Officer" before proceeding with any processes to minimize potential risks and find an appropriate solution.

This approach not only helps maintain our company's reputation as a law-abiding institution but also allows our employees to feel secure amidst legal complexities.

As a company, we are aware of our ethical and legal responsibilities, and we are committed to standing by our employees in fulfilling these responsibilities.

3. Combating Bribery and Corruption

Our company adopts a zero-tolerance policy towards bribery and corruption.

In this context, all our employees, managers, and business partners are obligated to uphold the highest ethical standards in our business relationships. This obligation includes full compliance with all applicable laws and regulations regarding the fight against bribery and corruption at both local and international levels.

These laws include the U.S. Foreign Corrupt Practices Act (FCPA), the UK's Bribery Act, the European Union's Anti-Corruption Directive, and similar regulations from the European Anti-Fraud Office (OLAF).

Additionally, Media Port is committed to compliance with the United Nations Convention Against Corruption (UNCAC), the Council of Europe's Criminal Law Convention on Corruption, the Council of Europe's Civil Law Convention on Corruption, the Anti-Money Laundering Directive (AMLD), the Public Procurement Directive, the European Public Prosecutor’s Office (EPPO), the EU Whistleblower Protection Directive, the Directive on the Protection of the EU's Financial Interests (PIF Directive), the EU Anti-Corruption Directive, and the policies and legal regulations of the European Anti-Fraud Office (OLAF).

By strictly adhering to these legal requirements, our company prioritizes transparency, integrity, and fairness in our business practices. We recognize that involvement in any bribery or corruption activities can harm our company's reputation and ability to conduct business. Therefore, we encourage all our employees and business partners to avoid such activities and provide necessary training on this matter.

In case of any suspicion related to bribery or corruption, our employees are expected to report immediately through the company's relevant mechanisms. This policy strengthens our company's position as a law-abiding, ethical, and responsible business and contributes to creating a safe and fair work environment for all our stakeholders.

3.1. Prohibition of Corruption and Influence Peddling

As Media Port, we take great care in every step we take to uphold our ethical values. In this context, **combating corruption is a critical priority for Media Port, and involvement in or association with any corrupt activities will result in serious sanctions for the parties involved.**

Corruption or influence peddling can damage the company's reputation and lead to severe penalties, such as bans from local authorities or imprisonment. Therefore, the use of consultants and intermediaries should only occur in exchange for genuine and legitimate services and under strict oversight and monitoring.

Particularly in tender processes, the acceptance of gifts and donations is strictly prohibited, as such actions can lead to professional and ethical dilemmas in the decision-making process and are absolutely unacceptable according to our company policy.

Regarding funding political parties, our company's general policy is to avoid such contributions to prevent potential conflicts of interest.

All these principles reflect our determination as Media Port to fulfill our ethical and legal responsibilities.

3.2. Compliance with Free Competition Rules

As Media Port, we are strictly committed to competition rules in all the geographic advertising markets we operate in. We embrace universal principles that prohibit anti-competitive agreements and the abuse of dominant positions.

We avoid any agreements or behaviors that hinder free competition among competitors, suppliers, or customers. We are aware of the financial and legal sanctions that may arise from violations of competition law, and therefore, we provide the necessary training and guidance to ensure that all our employees act in accordance with competition-related laws. (In Europe, these rules are defined by Articles 101 and 102 of the EU Treaty and have been integrated into the laws of all member countries.)

In case of any uncertainty or doubt, we encourage our employees to consult the "Compliance Officer." Maintaining a competitive environment and upholding ethical business practices are fundamental elements of Media Port.

3.3. Compliance with Financial Regulations and Accounting Standards

Media Port is committed to ensuring the accuracy and transparency of its financial information, fully complying with legal regulations regarding communication and confidentiality, and treating our shareholders equally and fairly.

We guarantee that our legal financial reports are in full compliance with national accounting standards. Protecting confidential information and preventing the leakage of trade secrets are fundamental principles that our employees must adhere to. In the event of any suspicion or evidence of financial misconduct, our employees are expected to consult the Compliance Officer.

4. International Sanctions Policy

International sanctions are of critical importance to Media Port. In this context, we periodically monitor the sanctions lists from the United Nations, the European Union, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), and other relevant sanction lists, avoiding collaboration with individuals and entities listed therein.

Our international sanctions policy requires full compliance with international rules in all our business relationships and commercial transactions.

To ensure the implementation of this policy, our company conducts a comprehensive due diligence process before establishing business relationships with new customers, suppliers, and partners. This process is designed to assess whether the relevant parties are on international sanctions lists and to evaluate potential risks.

We recognize that sanctions can change continuously, and therefore, we engage in ongoing monitoring and updating of sanctions lists and related legal regulations. When any sanction violation is detected, we act swiftly and effectively, taking the necessary corrective actions. This diligent approach confirms that our company operates in accordance with international legal obligations and maintains its position as a reliable partner in global trade.

5. Anti-Money Laundering Policy

Media Port takes all necessary preventive actions to prevent illegal activities such as money laundering and the financing of terrorism in all its operations.

In this context, our company is committed to full compliance with anti-money laundering laws, regulations, and standards that are applicable at both national and international levels. As part of this commitment, we implement a comprehensive internal control and compliance program that includes customer identification procedures, monitoring and reporting of suspicious transactions, and regular training for our employees on these matters.

We conduct all necessary efforts to ensure the transparency and legality of financial transactions in our relationships with our customers and business partners. Additionally, our company continuously reviews and updates best practices and procedures in the fight against money laundering, ensuring that our compliance program always incorporates the most current and effective methods.

Our policies not only protect our reputation as a law-abiding and ethical company but also support the integrity and security of our financial system. The implementation of this policy is closely monitored, and in the event of any detected violations in this area, necessary legal and corrective actions are taken swiftly. This approach ensures that our company and all our stakeholders are protected against the risks of money laundering and contributes to maintaining a reliable business environment.

6. Management of Relationships with Customers, Suppliers, and Third Parties

As Media Port, we prioritize the principles of transparency, integrity, and mutual respect in managing our relationships with customers, suppliers, and other third parties.

In our relationships with customers, suppliers, and other business partners, we promote fair trade practices, mutual benefit, and ethical business standards. In all these relationships, we implement appropriate due diligence processes and take necessary steps to ensure legal and ethical compliance. Agreements with third parties are aligned with our company's ethical codes and policies, ensuring that all parties operate at the same high standards.

This approach lays the foundation for long-term and sustainable business relationships, aiming to create value for all our stakeholders while preserving our company's reputation.

7. Rights and Responsibilities of Media Port Employees

Media Port takes its commitments to employees seriously, aiming to provide a safe and healthy working environment without discrimination.

The company is diligent in protecting confidential information and establishes clear rules to ensure that this information is not shared with unauthorized individuals. Employees are expected to use information systems solely for professional purposes, and access to these systems by unauthorized individuals and entities is prohibited.

Media Port employees are required to avoid personal activities that could damage the company's reputation and not to use company resources for personal gain. In case of any legal uncertainty, employees are encouraged to contact the Compliance Officer.

8. Sustainability

At Media Port, we place sustainability principles at the core of our business practices.

We aim to continuously improve occupational health and safety standards, reduce our environmental footprint, and lead in waste management while complying with a wide range of national and international regulations, from health and safety to environmental protection, equality and diversity, and human rights, while also considering the well-being of our employees and the community.

Supporting equality and diversity at every level is among our priorities, ensuring that every individual works in a fair and respectful work environment. Additionally, we strive to maintain respect for human rights in all our activities, working towards an ethical and fair business world.

We aim to meet the requirements of ISO 50001 Energy Management System, ISO 14001 Environmental Management System, and OHSAS 18001 Occupational Health and Safety Management System. We ensure a safe and healthy working environment by complying with local laws and regulations at all the airports where we operate.

Furthermore, we aim to comply with the maintenance and repair requirements established at the airports where our operations are located, as well as with health and safety regulations, environmental and sustainability policies at every stage of all our projects.

9. Ethics Hotline

Media Port Ethics Hotline is a corporate communication mechanism that allows Media Port employees and other relevant parties to report unethical behaviors such as corruption, bribery, misconduct, unfair practices, and violations of laws and policies. It is part of Media Port's efforts to uphold ethical standards and maintain a strong culture of business ethics.
When you feel you may be facing an ethical violation, evaluate the situation by asking yourself the following questions:

- Do you feel that a task assigned to you or a decision you have made or are considering contradicts our ethical principles and behavioral standards, or are you uncertain about its appropriateness?
- Do you think you are encountering a situation that is contrary to our company's procedures, guidelines, or regulations?
- Do you have doubts about whether the decision you are about to make complies with our internal procedures or legal regulations?
- Do you believe that an activity you have witnessed could harm our company's reputation?
- Do you think that a behavior you have observed could have negative effects on our company or our business partners?

If your answer to any of these questions is "Yes," first stop that behavior or activity immediately. If you witness such unethical behavior, report the situation to Media Port Ethics Hotline.

Reports are forwarded to the Compliance Officer and are reviewed solely by the compliance officer. In accordance with the EU Whistleblower Directive, the confidentiality of the reporting individuals is ensured, and whistleblowers are protected from any retaliation.

Media Port Ethics Hotline can be accessed via the link at **ethics@mediaport.com.tr**.