Media Port

Compliance Management Procedure

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1. PURPOSE

The Compliance Management Procedure prepared for Media Port Advertising Inc. ("Media Port" or "Company") aims to establish high ethical and behavioral standards by ensuring compliance with national and international legislation and regulations.
This procedure clearly defines ethical and behavioral principles, encouraging all employees, regardless of their employment categories and titles, to adhere strictly to these principles. Through the implementation of this procedure, Media Port aims to build a strong foundation to maintain its reputation in the business world and achieve its future corporate goals.

2. SCOPE

This procedure encompasses all employees within Media Port and Media Port stakeholders.

3. DEFINITIONS

Media Port Code of Ethics: This code outlines the principles and behaviors expected of employees and business partners that reflect the company's values, principles, and standards. It explains what ethical behavior entails and is communicated to new employees and potential business partners.

Media Port Employees: Refers to all employees at levels below the Board of Directors.

Media Port Ethical Principles and Behavioral Principles: These describe the principles that Media Port employees and the company must always adhere to in both individual and business relationships.

Third Party: Any individual, business, organization, or institution outside of Media Port that has a business relationship with the company.

High-Risk Third Parties: External organizations or individuals that may expose the company to legal, financial, or reputational risks if engaged in business.

Subcontractor: An independent firm or individual contracted to carry out a specific part or the entirety of a job or project on behalf of the primary contractor. Subcontractors provide the necessary labor, materials, and equipment to complete the work.

Intermediaries: Independent organizations or individuals appointed to facilitate business, conduct market research, manage customer relations, or provide similar services on behalf of Media Port.

Public Officials: Individuals acting on behalf of the government and providing public services.

Politically Exposed Persons: Individuals who hold prominent public positions at national or international levels, are associated with significant public functions, or are members of political parties.

Donations: Cash or in-kind payments made voluntarily and without expectation of return.

Sponsorships: Activities conducted by Media Port in areas such as sports, cultural activities, social issues, environmental initiatives, and aviation and advertising-related events, which may involve cash or in-kind contributions.

Membership: Participation by Media Port in any professional organization, association, or similar entity, either regularly or for a specific purpose.

Events: Various organizations including presentations, sports events, cultural activities, business conferences, meetings, professional conferences, congresses, sector development meetings, concerts, or entertainment such as New Year celebrations and festivals.
Social Investments: Initiatives financed by the company for third parties or public benefit that aim to generate social and/or financial returns. Support to charities involves direct payments to officially registered organizations for charitable, educational, scientific, or artistic purposes.

Misconduct: The misuse of company assets, resources, or authority, including fraud, theft, corruption, and other illegal or unethical behaviors.

Bribery: Offering, paying, promising, or authorizing any money or valuable item directly or indirectly to any person (foreign official or private individual) to influence any action or decision in that person's capacity.

Corruption: A moral decay or compromise in the decision-making process, where a decision-maker accepts or requests a deviation from the criteria that should guide their decision in exchange for a reward or promise of reward; such motivating factors are strictly rejected by this policy.

Money Laundering: The attempt by individuals or organizations to make illegal or illicit income appear legitimate or legal. This includes concealing the origins of money or other assets derived from criminal activities. It also involves the use of legitimate funds to support crime or terrorism.

Facilitation Payments: "Unofficial" small cash payments made directly or indirectly to government officials to facilitate, expedite, or ensure the proper performance of functions or services they are already obligated to perform.

Harassment: Unwanted behaviors that cause an employee to feel intimidated, offended, or belittled in the workplace.

Bullying (Mobbing): Systematic and continuous psychological harassment, humiliation, exclusion, or pressure exerted on an employee by one or more individuals.

Compliance Officer: The Media Port Board of Directors appoints a Compliance Officer to manage, oversee, and implement the Compliance Management Procedure. The Compliance Officer reports directly to the Board of Directors, prepares reports on the operation and need for updates of the procedure, and presents them to the Board.

The Compliance Officer plays a critical role in ensuring the company's full compliance with legal regulations and ethical standards. In this capacity, they guide employees and business partners regarding company policies and procedures, conduct regular training to enhance employees' knowledge and awareness, answer questions related to compliance and ethics, perform annual risk assessments, and continuously review the effectiveness of the anti-corruption program. In cases of any non-compliance or allegations of unethical behavior, they investigate these matters and carry out the necessary inquiries.

4. ETHICAL PRINCIPLES AND BEHAVIORAL RULES

Media Port expects all its employees and managers to act in accordance with the highest ethical standards, and it is mandatory for employees and the Board of Directors within Media Port to comply with the Ethical Principles and Behavioral Rules established by the company.

In the event of non-compliance with these principles, the Compliance Officer is to be informed. The Compliance Officer is responsible for investigating the incident and determining and implementing the necessary corrective and remedial measures.

- **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.

4.1. ETHICHS HOTLINE

Media Port Ethics Hotline is a channel through which Media Port employees and other relevant parties can report unethical behaviors such as corruption, bribery, misconduct, unfair practices, and violations of laws and policies via email. It is part of Media Port's efforts to uphold ethical standards and maintain a strong culture of business ethics.

Ethical violations may include the following:

- Bribery, corruption, and money laundering activities
- Misuse of company assets
- Falsification of company documents and data
- Theft or personal use of company property
- Acceptance or offering of inappropriate gifts
- Billing for illegal goods or services
- Preparation of misleading travel expense reports

- Engaging in conflicts of interest with customers or suppliers
- Engaging in anti-competitive behaviors
- Cybersecurity breaches
- Bullying (mobbing)
- Situations that may create conflicts of interest
- Deliberately providing false or misleading information in financial reports
- Discrimination or harassment based on gender, race, religion, age, sexual orientation, disability status, or other personal characteristics
- Fraud and deception
- Intellectual property theft
- Violation of health and safety standards
- Non-compliance with environmental regulations
- Behaviors contrary to business ethics
- Leakage of the company's confidential information to unauthorized individuals

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 principles, 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 and report the situation to **ethics@mediaport.com.tr**.

The use of the Media Port Ethics Hotline reflects the company's commitment to ethical principles and professional standards, helping to reinforce the trust of Media Port's employees, customers, and other stakeholders. The existence of the Media Port Ethics Hotline is part of Media Port's commitment to supporting a sustainable and responsible business structure. When a report is made through the Media Port Ethics Hotline, Media Port protects the whistleblower.

If you wish to notify the Media Port Compliance Officer of an ethical violation, you can send an email to **ethics@mediaport.com.tr** using your own email address or by creating an anonymous email address.

5. COMBATING MISCONDUCT

As Media Port, we implement strict measures to prevent and detect all forms of misconduct in our processes and activities. Our company adopts a zero-tolerance policy towards misconduct and is aware that such behaviors can harm the company's reputation, financial health, and the safety of employees.

To prevent misconduct, our company:

- Strengthens and regularly reviews internal control systems
- Conducts risk assessments and applies additional controls in high-risk areas
- Trains employees on signs of misconduct
- Provides transparent and accessible reporting channels

- Regularly audits financial transactions and records

Our company encourages the reporting of misconduct cases and expects employees to report any observed misconduct through the Media Port Ethics Hotline.

Misconduct reports will be handled in accordance with confidentiality and anonymity principles, and necessary review and investigation processes will be initiated promptly.

The misconduct prevention policy is part of our commitment to continuous improvement and adopting best practices, and all employees, managers, and other relevant parties are responsible for the implementation of this policy.

5.1. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Violating any anti-corruption laws can pose serious crimes and risks, potentially leading to heavy fines for companies and imprisonment for individuals. The "Media Port Anti-Bribery and Anti-Corruption Policy" outlines the principles that Media Port must adhere to while operating ethically, responsibly, and within legal boundaries in every region where it operates or plans to operate.

The regulations regarding bribery and corruption apply to Media Port itself, its subsidiaries, including senior management and the Board of Directors, employees, subcontractors and suppliers, business partners, customers, intermediaries, and any other individuals who may act on behalf of or in favor of Media Port, as well as those cooperating with Media Port in any way.

Media Port can be held responsible for bribery or other corrupt actions committed by third parties (such as subcontractors or suppliers) involved in contracts it enters into. Therefore, Media Port takes measures to mitigate such risks and includes anti-corruption and anti-bribery clauses in its contracts.

Even the suspicion or appearance of violating national or international anti-corruption laws can damage Media Port's reputation and put its employees at risk. Therefore, any such suspicious situation must be reported immediately to the Media Port Compliance Officer.

5.2. RELATIONS WITH OFFICIAL / PUBLIC INSTITUTIONS

Interactions with public officials are assessed with sensitivity, and care must be taken against bribery and corruption risks. Therefore, Media Port employees and stakeholders shall not offer or authorize gifts, promises, or any other advantages to public officials, either directly or indirectly, in cash or in any other form. Such payments, gifts, promises, or advantages, even if made through an intermediary or a close family member of the intermediary, may violate relevant anti-corruption legal regulations when made to benefit any public official, political party, or any third party.

Media Port is committed to compliance with the UK Bribery Act of 2010, the U.S. Foreign Corrupt Practices Act (FCPA), 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).

Additionally, Media Port aims to comply with legal regulations implementing the OECD's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the United Nations Convention Against Corruption, as well as the anti-corruption, anti-money laundering, or conflict of interest laws of the countries in which it operates.

The following principles should be observed in relations with public officials:

- All interactions with public officials must comply with local and international laws.
- All transactions and interactions with public officials must be open and transparent. Confidential agreements or misleading practices should be avoided.
- All financial transactions and interactions with public officials must be accurately and completely recorded in writing. These records should be open to audits and reviews when necessary.
- No actions involving bribery or corruption should be taken to provide an advantage or influence business decisions.
- Media Port employees are regularly trained and informed about the legal and ethical principles to be followed in interactions with public officials.
- Media Port has an Ethics Hotline where employees can report any unethical behavior or corruption related to public officials.
- Media Port should not make any gifts or payments to public officials or offer anything of value unless explicitly permitted in this procedure.

Adhering to these principles in relations with public officials ensures the protection of Media Port's reputation and the maintenance of public trust.

5.3. EMPLOYMENT OF POLITICALLY EXPOSED PERSONS

Employing politically exposed persons (PEPs) poses a high risk for organizations and therefore requires careful assessment and enhanced compliance scrutiny. It must always be considered that employing politically exposed persons could harm the company's reputation, legal standing, and other business relationships. To manage these potential risks, Media Port implements strict compliance protocols such as due diligence processes and continuous monitoring.

Media Port ensures full compliance with relevant legislation and all anti-corruption laws regarding the employment of politically exposed persons and adheres to the following standards:

- The Financial Action Task Force (FATF) recommendations suggest the implementation of enhanced due diligence (EDD) procedures when dealing with politically exposed persons.
- The EU Fourth Anti-Money Laundering Directive mandates extra caution and the application of EDD when conducting business with politically exposed persons.
- The Foreign Corrupt Practices Act (FCPA) prohibits U.S. companies from bribing foreign officials and includes situations that require special attention when dealing with politically exposed persons.
- Comprehensive legal regulations regarding anti-bribery are established in the UK, demanding high standards in relationships with politically exposed persons.

Media Port employees and stakeholders can report any doubts or concerns related to the employment of politically exposed persons to the Media Port Compliance Officer or the Media Port Ethics Hotline. This line allows employees and other parties to anonymously report potential violations, enhancing transparency and accountability within the company and playing a critical role in maintaining the company's legal compliance and reputation.

5.4. PRINCIPLES REGARDING TENDER PROCESSES

The tender processes play a critical role in achieving our company's growth and development goals. Our performance during bidding periods shapes not only the success of our current projects but also our long-term reputation and position in the market. Therefore, there are several important factors to consider during bidding periods, and all our employees are expected to act ethically in the procurement processes. Ethical behavior does not only mean fulfilling legal obligations; it also involves a strict adherence to the principles of

integrity, transparency, and fair competition. While engaged in the procurement process, our employees are expected to comply with the following principles:

Transparency and Integrity: Throughout the entire procurement process, transparency and honesty must be maintained, and the bidding documents should be clear and understandable.

Legal Compliance: Full compliance with all legal regulations and standards related to the procurement must be ensured.

Careful Review of Documents: Bidding documents, specifications, and draft contracts should be carefully reviewed, and all necessary information must be fully understood.

Time Management: Strict adherence to the procurement schedule and deadlines is required.

Risk Assessment: Before submitting a bid, potential risks related to the project should be assessed, and measures should be planned to address these risks.

Compliance with Ethical Principles: Avoidance of bribery, corruption, and any unethical behavior is essential.

Avoidance of Conflicts of Interest & Gift Hospitality Policy: There should be no conflicts of interest during the procurement process, and all forms of gift hospitality should be avoided.

Quality and Sustainability: The quality of the proposed products or services and their compliance with sustainability criteria should be taken into consideration.

Confidentiality: The confidentiality of information obtained during the procurement process must be respected, and care should be taken to ensure that this information is not shared with unauthorized individuals.

5.5. GIFT, HOSPITALITY, EVENT, AND REPRESENTATION PRINCIPLES

Media Port employees, their family members, or close relatives should not accept or offer any gifts or hospitality that aim to influence business decisions or have the potential to create such influence.
All employees should consult the company's ethical principles and policies, and if in doubt about whether gifts or hospitality can be accepted or given, they should contact the Media Port Compliance Officer when necessary.
Events and gifts may include:

- Events and gifts that represent or are consistent with local culture,
- Gifts for marketing or promotional purposes (e.g., calendars),
- Events that may include business conferences, meetings, professional conferences, congresses, sector development meetings, and entertainment (e.g., parties) or activities (e.g., boat tours),
- Gifts in the form of free or discounted tickets to sports, music, or cultural events,
- Necessary events and gifts for courtesy purposes, such as New Year celebrations and festivals.

Social events, meals, or entertainment can be offered and accepted for Media Port if there is a clear and fair business reason and if they do not exceed the specified limits. In such cases, a Media Port employee's travel, accommodation, and other expenses should always be covered by the company. Approval for gifts and hospitality must be discussed with the employee's manager. Even if prior approval is not required, it is advisable to inform the manager for transparency and compliance purposes.
In this context, only meetings held for business purposes at Media Port offices or at the offices of suppliers, customers, and business partners will be considered as events.
Before giving a gift or business courtesy, reference should be made to the dashboard regarding its nature, amount, and frequency, and the gift or hospitality should be given without expecting any action or decision in return. Additionally, the value of gifts offered to customers should not exceed the specified amounts and

should be sent to the workplace. Entertainment expenses should be allocated for professional or promotional meetings and should be in the form of collective invitations rather than individual ones.

Category	Examples	Amount	Frequency
Gift (Received)	New Year cards, wine or champagne, chocolates, flowers, art and sports invitations, clothing accessories, year-end food basket	*100 Euro	Maximum once per year for the same customer or supplier.
Gift (Given)	New Year cards, wine or champagne, chocolates, flowers, art and sports invitations, clothing accessories, year-end food basket	*100 Euro	Maximum once per year for the same customer or supplier.
Hospitality (Received)	Breakfast or dinner invitation	*100 Euro	Maximum three times per year for the same customer or supplier.
Hospitality (Given)	Breakfast or dinner invitation, transportation (taxi, chauffeur-driven vehicle), site/platform visits	*100 Euro	Maximum three times per year for the same customer or supplier.

Large or extravagant gifts, repeated gifts, and gifts that could be perceived as bribery or violations of the law are considered risky situations. Gifts that are accepted in exchange for something, especially during bidding, procurement, and contract renewal periods, should not be accepted. Gifts or hospitality given to third parties' friends, relatives, or family members during the bidding, procurement, and contract renewal periods are also prohibited. It should be ensured that business gifts are permitted by local legislation. Additionally, in relationships with suppliers, compliance with the laws and regulations of the country in which the business operates must be maintained.

5.6. SPONSORSHIP AND DONATION POLICIES

Sponsorships and donations are one of the ways our company fulfills its social responsibilities and increases brand awareness. Through these financial contributions, we support non-governmental organizations, education and health sectors, and arts and culture projects, while also strengthening our relationship with the community and creating a positive image. However, it is important that these contributions are managed effectively and transparently, aligning with the company's values and strategic goals. Therefore, our sponsorship and donation policy clearly defines our approach and commitments in this area, providing a clear and understandable framework for both internal and external stakeholders. Our policy includes criteria and processes that determine which types of projects and organizations will be supported, how these decisions will be made, and how the support provided will be evaluated. This ensures that our sponsorship and donation activities align with the company's overall mission and contribution goals to society.

While sponsorships and donations are generally accepted in both legal and international business environments, they must be carefully evaluated. Support for social investments and charities should never be made to influence an individual or organization, especially a public official, to act or refrain from acting in a manner directed by the company.

A preliminary review and assessment should always be conducted to determine whether a public official may benefit directly or indirectly from social assistance or donations to associations and foundations. However, donations made for natural disasters that have been decided by the Council of Ministers, as well as donations to charities that serve the public good, foundations recognized as tax-exempt by the Council of Ministers, institutions and organizations engaged in scientific research, provincial special administrations, municipalities,

and village legal entities, and donations to public administrations with general and special budgets are excluded from this scope.

All social investments and charity donations will be made through a written contract that clearly states Media Port's contribution, the contributions of other participating organizations, the purpose of the project, beneficiaries, timeline, and cost scale. This contract will include anti-corruption clauses approved by the Compliance Officer, and necessary audit rights will be applied in the contract.

Media Port employees, officials, branches, and subsidiaries, as well as subcontractors, suppliers, customers, and business partners, shall not make any donations to any political organization or support political parties or politicians on behalf of or in favor of Media Port.

The conditions under which donations and sponsorships would be inappropriate are as follows:

- They cannot relate to political support (to political parties, politicians, or related institutions).
- They cannot be made in a manner that could be interpreted as bribery.
- They cannot be made with the intention of obtaining or maintaining business from the recipient or influencing business decisions.
- They cannot be provided to individuals.
- They cannot be provided to organizations with negative environmental impacts.
- They cannot be provided for religious or military activities.
- It is prohibited to provide any donations or sponsorships directly or indirectly to government and/or public officials to obtain a public service or benefit, to influence their decisions in line with legitimate services, or to prevent others from providing public services.
- Donations and sponsorships with socially appropriate and reasonable values can be initiated as part of local culture or as generally accepted and/or known local industry practices, provided they do not influence the decision-making or operational processes of government and public officials or violate any laws and regulations.

5.7. ANTI-MONEY LAUNDERING POLICY

Media Port is opposed to the use of the company's tools and resources for money laundering purposes and will never approve, facilitate, or support money laundering.

Media Port takes all appropriate steps to define and assess the integrity of any third party with which it has or will have a business relationship.

Every employee, outsourced employees, subcontractors, suppliers, business partners, customers, intermediaries, and anyone who may act on behalf of or in conjunction with Media Port must be vigilant regarding the form of payments made in the relevant company operations to detect any irregularities, especially concerning partners or subcontractors or suppliers exhibiting suspicious behaviors. If there are any situations that appear inappropriate in a transaction or that may violate applicable laws, regulations, or the provisions of this procedure, employees must report this to their managers and/or directly to the Compliance Officer.

Without obtaining any written approval from a senior executive, the Board of Directors, and/or the Compliance Officer, Media Port employees must never:

- Make payments to an entity that is not a party to the transaction (e.g., a third party) or to an entity that is not legally authorized to receive payment.

- Accept payments from an entity that is not a party to the transaction (e.g., a third party) or from an entity that is not legally authorized to make payments.
- Accept cash payments outside of a secure banking system.
- Ship customer orders in a manner that violates standard procedures.
- Conduct foreign exchange transactions with unauthorized entities.

6. MANAGEMENT OF RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS, AND THIRD PARTIES

Third parties engaged in a business relationship with Media Port are expected to act in accordance with Media Port's ethical requirements. This is implemented by including a Business Partner Pledge [1]in the relevant contracts and requiring the potential third party to complete a Business Partner Identification Form [2]before entering into a business relationship.

Entering into a business relationship without the Third Party Commitment in the Business Partner Identification Form and relevant contracts is prohibited.

6.1. CONFLICT OF INTEREST

Media Port employees are expected to remain loyal to the company and act honestly in business relationships, avoiding any situations that could negatively influence their actions or decisions or give the impression of a real or perceived conflict of interest. They must not provide or facilitate inappropriate advantages to other companies, organizations, or individuals.

Conflicts of interest may not always be clear and often require case-specific examination. The best preventive measure is to avoid any direct or indirect business connections with competitors, customers, or suppliers outside of operations conducted on behalf of Media Port.

No Media Port employee should work on any matter in which they, their spouses, partners, close relatives (biological or adopted), children, grandchildren, parents, grandparents, siblings, or their children, or other household members or closely related individuals have a direct or indirect financial interest without prior written notification to the company, management, or Compliance Officer. Any employee who finds themselves in a conflict of interest situation must report it in writing to their manager, who will then inform the Compliance Officer. The employee's manager will decide how to address the conflict of interest with the Compliance Officer.

Media Port employees must not use information obtained through their roles for personal gain or to compete with Media Port.

Below are some situations where a conflict of interest may arise:

- An employee or their close family members working for a competitor or potential competitor, supplier, subcontractor, or business partner while employed by Media Port.
- Media Port employees holding board member or managerial positions in a competing organization.
- Having a stake or financial interest in competing companies, suppliers, customers, or subcontractors.
- Gaining personal, financial, or potential profit from any company operations.
- Awarding company business to a firm owned or controlled by the employee or their spouse, partner, biological or adopted children, grandchildren, parents, grandparents, siblings, or their children, or other household members.

[1] Business Partner Pledge
[2] Business Partner Identification Form

- Accepting or offering gifts, discounts, favors, or services from/to a customer/potential customer, competitor, or supplier unless permitted by this Compliance Management Procedure.
- Obtaining discounts and similar advantages from relevant third parties unless offered to all Media Port employees through company channels.
- Making personal/private side agreements with customers, suppliers, and other business partners.
- Establishing personal relationships with customers, suppliers, and other business partners that exceed the traditional and socially acceptable business framework.
- Participating in transactions or decisions that affect the employee, their family members, or other related individuals.
- Gaining personal advantage or providing an advantage to a third party by using data and information related to Media Port that is not publicly available.

If a Media Port employee cannot determine whether a business relationship creates a conflict of interest, they should consult their manager or the Compliance Officer.

6.2. DUE DILIGENCE PROCESS AND SUPPLY CHAIN COMPLIANCE POLICY

Media Port implements a comprehensive due diligence process and sanction controls to ensure that its business processes and activities are conducted in full compliance with laws, regulations, and internal policies.

The due diligence process applies to all business partners, customers, suppliers, and other relevant parties before establishing a business relationship and throughout the process. This process includes a detailed review and assessment to ensure that legal obligations and risk assessments are accurately conducted.

In the due diligence process, potential third parties are required to complete a Business Partner Identification Form. Initiating a business relationship without completing this form is prohibited.

Our contracts also include provisions in accordance with the directives of the Third Party Commitment document.

Media Port employees are obligated to report any suspicious situations or non-compliance immediately to the Compliance Officer. If non-compliant actions are detected, the business relationship may be suspended or terminated, relevant authorities may be notified, and/or legal action may be initiated.

Media Port employees receive regular training on the due diligence process and sanction controls, raising awareness of the importance and necessity of these processes.

6.3. INTERNATIONAL SANCTIONS POLICY

Sanctions are restrictive measures imposed by states or international organizations against a specific country, organization, or individual in international relations. They are typically used to deter or punish certain behaviors related to violations of international law or human rights, corruption, financing of terrorism, prevention of the proliferation of weapons, and other security threats. Sanctions can take various forms, including trade restrictions, barriers to financial transactions, travel bans, and the reduction of diplomatic relations.

Sanction controls are regularly conducted to ensure Media Port's compliance with sanction lists and other prohibited or restricted parties lists.

Media Port is committed to compliance with the UK Bribery Act of 2010, the U.S. Foreign Corrupt Practices Act (FCPA), 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).

Additionally, Media Port aims to comply with legal regulations implementing the OECD's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the United Nations Convention Against Corruption, as well as the anti-corruption, anti-money laundering, or conflict of interest laws of the countries in which it operates.

Media Port employees are obligated to report any suspicious situations or non-compliance immediately to the Compliance Officer. If non-compliant actions are detected, the business relationship may be suspended or terminated, relevant authorities may be notified, and/or legal action may be initiated.

Media Port employees receive regular training on the due diligence process and sanction controls, raising awareness of the importance and necessity of these processes.

6.4. RELATIONS WITH INTERMEDIARY INSTITUTIONS

Media Port engages intermediaries, including agents, consultants, and third-party representatives, in compliance with laws and regulations and solely for legitimate business purposes.

Before entering into a business relationship with intermediaries, a Business Partner Identification Form must be completed and reviewed to ensure that they act in accordance with Media Port's ethical behavior standards and integrity. Written agreements are made that clearly define the scope of work, duties and responsibilities, and payment terms. These agreements include provisions requiring intermediaries to comply with all relevant anti-corruption laws and Media Port's Anti-Corruption Policy.

No intermediary will be authorized to act on behalf of Media Port without the completion of the necessary review and approval processes and the explicit written approval of an authorized Media Port representative.

Media Port reserves the right to audit and monitor the activities of intermediaries to ensure compliance with the terms of the agreement and Media Port policies. Any unauthorized actions by intermediaries or violations of anti-corruption laws must be reported immediately to the Media Port Compliance Officer, Senior Management, or the Media Port Ethics Hotline.
If any intermediary is found to be acting contrary to Media Port's Compliance Management Procedure or applicable laws, Media Port reserves the right to terminate the agreement and/or initiate legal proceedings.

6.5. FACILITATION PAYMENTS

Media Port strictly prohibits any form of facilitation payments, bribery, or any illegal payment methods.

Every employee must immediately report any illegal payment offers or requests they encounter to senior management or the Media Port Ethics Hotline.

7. SUSTAINABILITY POLICY

Media Port aims to provide a safe and healthy working environment by complying with local laws and regulations in all locations where it operates. Additionally, it seeks to adhere to the established maintenance and repair requirements, health and safety regulations, and environmental and sustainability policies at the airports where its operations are located, throughout all facilities and at every stage of all projects.

7.1. HEALTH, SAFETY, AND ENVIRONMENTAL GOALS

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. Additionally, we strive to adhere to the established maintenance and repair requirements, health and safety regulations, and environmental and sustainability policies at every stage of all projects in the airports where our operations are located.

Media Port employees are expected to:

- Comply with all security policies, procedures, principles, and instructions of the company and the project.
- Use personal protective equipment when necessary or when instructed.
- Learn the emergency procedures at their workplace.
- Refrain from consuming alcohol or drugs (prescription, over-the-counter, or illegal) while at work, except for authorized activities.
- Immediately stop any work they believe to be unsafe.
- Promptly report unsafe working conditions, near hazards, accidents, injuries, or illnesses to their managers.

7.2. ENVIRONMENTAL PROTECTION AND WASTE MANAGEMENT POLICY

Media Port complies with the environmental laws and regulations applicable in the countries, regions, and projects where it operates to prevent and mitigate the negative impacts of its activities on the environment. Relevant local and international laws, regulations, and contracts are monitored by Media Port.

This commitment and the Media Port Sustainability Policy also extend to Media Port's subcontractors, suppliers, and business partners.

Employees are expected to:

- Be aware of and comply with environmental standards and regulations related to their work.
- Immediately report any incidents that may have harmful effects on the environment to their managers.
- Consider and minimize the environmental impact of operations within their areas of influence.
- Use company resources efficiently and sustainably.

Media Port places importance on waste management for a sustainable environment. In this context, we are developing effective strategies for waste reduction, reuse, and recycling. Our goal is to minimize waste production in all our business processes and manage the resulting waste responsibly without harming the environment.

In line with this, Media Port:

- Ensures that the equipment and materials used are durable, support low power consumption, and are easy to maintain. Equipment and materials should comply with relevant environmental standards, and efforts should be made to obtain ISO 14024 standards whenever possible.
- Whenever appropriate, recycled materials should be preferred, and recycling should be encouraged in the packaging and transportation of products.
- Limits or eliminates harmful substances in the materials and equipment used that could pose risks to health and the environment.

7.3. EQUALITY AND DIVERSITY

Media Port respects all individuals without discrimination. The company strives to create a positive working environment based on equality and diversity. The recruitment, training, and personal development of employees from diverse backgrounds are important to Media Port. By building teams that reflect the markets and communities in which it operates, Media Port recognizes and values these differences and is committed to providing equal job opportunities to all qualified employees and candidates. However, positive discrimination practices are reserved for situations where they are legal and appropriate to ensure equality and diversity.

Media Port employees must comply with all laws and regulations that prohibit discrimination based on age, race, gender, national origin, nationality, religion, health, disability, marital status, sexual orientation, political or philosophical beliefs, union membership, or any other characteristics protected by applicable laws and regulations.

Employees are encouraged to report any observed or experienced mistreatment to management.

7.4. HUMAN RIGHTS

Media Port is committed to a culture of respect and inclusivity for individuals and demonstrates zero tolerance for any decisions or actions that violate human rights and dignity.

Harassment and discrimination based on gender, age, race, national origin, religion, sect, sexual orientation, disability, or any legally protected class are strictly prohibited and will result in disciplinary action if detected.

When hiring, promoting, or offering salaries, Media Port acts based on a merit system and does not discriminate based on age, gender, disability, marital status, race, national origin, religion, sect, sexual orientation, or any legally protected class or status.

Our customers and business partners are also obligated to comply with our prohibitions against harassment, discrimination, and retaliation. All stakeholders of our company are responsible for ensuring an inclusive work environment free from discrimination, where every employee is treated fairly.

If employees witness or experience harassing or discriminatory behavior, they should report it to their manager, and also to the Compliance Officer or through the Media Port Ethics Hotline, if possible.

8. RISK ASSESSMENT PRACTICES

Media Port conducts routine risk assessments to manage and mitigate potential risks in its business processes and activities.

Routine risk assessments will be carried out at regular intervals for all business units, projects, and operations of the company, customized according to the nature, size, and complexity of the work.

The risk assessment process includes identifying existing and potential risks, classifying risks in terms of likelihood and impact, determining measures to be taken against risks, implementing risk mitigation strategies, and reviewing and reporting the assessment results.

The results of the risk assessments will be used to guide management decisions and strategic planning, contributing to the continuous improvement of risk management processes.

9. DATA PRIVACY POLICIES

Media Port is committed to protecting the privacy and security of personal data and ensuring that this data is processed only within a legal and ethical framework. Media Port complies with the requirements of the Personal Data Protection Law (KVKK), the General Data Protection Regulation (GDPR), and relevant data protection laws in the processes of collecting, using, storing, transferring, and disposing of personal data.

Media Port is dedicated to continuous improvement and compliance in data privacy and the protection of personal data, aiming to fully meet its legal obligations in this area.

10. TRAINING PROGRAM

Media Port conducts regular training programs to ensure that all employees are aware of and equipped with knowledge regarding the Anti-Bribery and Anti-Corruption Policy, gift, hospitality, event and representation principles, anti-money laundering policy, sponsorship and donation policies, sanction controls, sustainability policy, and supply chain compliance policy.

The training covers topics related to recognizing, preventing, and reporting risks that may be encountered in business relationships and is mandatory for all employees. New hires are expected to complete their training within six months of their start date. For existing employees, the training is repeated annually.

The training is conducted interactively and is designed to help employees learn about ethical behaviors and company values. At the end of each training session, participation rates are shared with senior management.