

CODE OF ETHICS AND BUSINESS CONDUCT (“CODE”)

1. Responsibilities and Reporting

Each of us is responsible for fulfilling our duties in accordance with the Rules set out in the, “Code”

It is the personal responsibility of every employee of Summa Turizm Yatırımcılığı A.Ş. and all group companies (Collectively “Summa” or “Summa Group Companies” or “Company”) to read and understand this Code and to undertake to protect ethical principles by complying with this Code. All employees are required to participate in periodic training as requested by Summa. If you are ever in doubt about any decision or course of action in the course of your duties, first ask yourself the following questions:

- Is this decision/behavior legal?
- Is this decision/behavior ethical?
- Is this decision/behavior consistent with our Code?
- Does this decision/behavior reflect our values and culture?

If you can confidently answer “yes” to all of the above questions, you can safely proceed. However, if you answer “no” to any of the above questions, DO NOT proceed as the decision and/or action may have serious consequences for Summa and for you. Seek advice from your supervisor where necessary.

If you have consulted with your supervisor and the matter still poses a risk to your department, or if you have observed another risk in the Company that is not related to your department but that you have witnessed, it is your responsibility to inform the Compliance Officer for advice on how to manage this risk.

All management levels must ensure that their teams understand our Code, lead by good example, encourage open and constructive communication, take appropriate corrective action and support our employees.

2. Protection of Confidential and Private information

We must protect the confidential information of agents, customers, suppliers and all others. Unless the law requires otherwise, we must only share it within the Company, during or after our employment, and only on a need-to-know basis.

We must not illegally or unethically accept confidential information about any person, including our competitors.

We must also fulfill our confidentiality obligations to our former employers or people with whom we have had a relationship in the past, or to our family, relatives and friends.

Private and confidential information includes, among other things, marketing plans, sales and marketing data, customer and employee records, research and technical data, production techniques, pricing information, strategies and information on new products and services, current, past and future business plans, customer and supplier information, financial and other operational and business information. Such information must be protected in accordance with the Company's procedures and used only in relation to the Company's activities and business; it must not be disclosed or disclosed unless authorized.

3. Confidentiality of Personal Data

Confidentiality applies not only to business related information but also to the personal data of the Company's employees, former employees, job applicants, consultants, clients, and other relevant individuals. We must protect and maintain the confidentiality of all such personal data owned by the Company by adhering to the following principles:

Personal data is collected, processed, stored, and transferred with appropriate measures taken to ensure confidentiality and is accessible only to individuals who have legitimate reasons to be informed about or access it.

We collect, process, and use personal data only to the extent necessary for legitimate and clearly defined purposes. The data and information we access may only be used as permitted. If necessary, individuals will be asked to provide consent for the collection, processing, transfer, and storage of their personal data. Summa is fully committed to complying with all applicable data protection laws.

4. Protection and Proper Use of Company Assets

We must all make efforts to protect the Company's assets, including intellectual property rights, and ensure their efficient use. We should take all reasonable measures to protect the Company's assets against loss, damage, misuse, or theft. These efforts may include, but are not limited to the following:

- You should be vigilant against situations that may lead to the loss, damage, misuse, or theft of the Company's assets and report any loss, damage, misuse, or theft you observe.
- Do not use, transfer, assign, misuse, lend, sell, or donate any of the Company's assets without the necessary and appropriate authorization.
- Take reasonable and appropriate steps to ensure that the Company obtains good value in return for the resources it expends.
- Do not use Company assets in a manner that would cause or facilitate a violation of the law.
- Use and protect assets entrusted to the Company's care by others with the same level of diligence as you would apply to Company assets.
- Negligence and waste directly impact the Company's profitability.
- Materials, goods, and equipment owned by the Company should not be used for purposes or activities outside of Company business.
- The theft and/or misuse of Company assets for any purpose will result in the termination of employment and/or a criminal investigation.

5. Compliance with Legal Regulations

Wherever you are in the world, you must comply with applicable laws and regulations. If you have any doubts about the correct interpretation of these laws and regulations or their consequences, seek advice from the Compliance Officer before taking any action.

6. Compliance with Contractual Obligations

By adhering to the contractual obligations we have undertaken, we gain the trust of our business partners. All employees shall honor the contractual obligations, which the company is bound.

7. Compliance with Corporate Policies and Procedures

Summa Managers and Employees must adhere to all corporate policies and procedures in every location where Summa operates.

8. Unfair Competition

Summa commits to acting fairly and legally in the Marketplace towards other companies and competitors who do business with or for us.

9. Human Rights and Dignity

Our employees are our most valuable asset and the driving force behind our success. Therefore, Summa has adopted a culture of respect and inclusion and maintains a zero-tolerance policy towards any decisions or actions that are contrary to human rights and dignity.

Being respected means being treated honestly and professionally, and treating others the way you would like to be treated.

Summa, in the countries where it operates, observes the provisions of the relevant legislation and the framework of the "Universal Declaration of Human Rights," the "United Nations (UN) Global Compact," the "UN Convention on the Rights of the Child," the "Fundamental ILO Conventions," the "OECD Guidelines for Multinational Enterprises," and the "UN Guiding Principles on Business and Human Rights." It ensures the regulation of labor relations and working life within these frameworks and is firmly against the employment of individuals under the legal working age, slavery, forced labor, discrimination, and all forms of violence and abuse.

Harassment or discrimination based on gender, age, race, national origin, religion, sect, language, political views, social class, union membership, pregnancy, marital status, sexual orientation, disability, or any class protected by law is strictly prohibited, and actions or attitudes to the contrary will result in disciplinary measures. Harassment can take many forms, including retaliatory or intimidating actions, aggressive language, or inappropriate jokes. Such behaviors can be destructive to the team environment we strive to develop. Each of us is responsible for providing an inclusive work environment where there is no discrimination, and every employee is treated fairly.

Summa employs, promotes, and compensates employees based on merit, regardless of age, gender, marital status, race or color, national origin, religion, sexual orientation, or any class or status protected by law.

Harassment, discrimination, and retaliation are prohibited, and just like our employees, our clients and business partners must also adhere to these rules. If you witness or experience any harassing or discriminatory behavior, report it to your manager and, if possible, simultaneously to the Compliance Officer. You have the power to be part of the solution. We must all work together to ensure a respectful and inclusive work environment.

10. Business Activities and Financial Records

Make sure that activity logs, inventory records, quality reports, expense accounts, ledgers, and all other records related to our business are prepared accurately and reliably. All information and documents should be archived along with the necessary supporting documents.

These records are the responsibility of all Summa employees and reflect the Company's reputation and reliability. They also ensure that our company meets its legal and regulatory obligations.

The integrity of our financial statements and other legal disclosures is critical to the successful operation of our activities and to maintaining the trust and confidence of our shareholders, customers, business partners, and other stakeholders. If you are involved in the financial reporting process, you have a special responsibility to ensure that our financial statements are accurate, complete, objective, relevant, and understandable. All financial information must be correct and complete, and in compliance with applicable accounting principles and legal requirements.

11. Occupational Health, Safety and Security

Summa employees play an important role in creating healthy, safe, and secure workplaces for our guests, visitors, and all colleagues.

You must act in accordance with the relevant occupational health and safety regulations and legislation at all Summa workplaces. You should demonstrate responsible behavior and never compromise on occupational health and safety by taking unnecessary risks anywhere.

12. Conflict of Interest

A conflict of interest is any situation or activity that involves or appears to involve a conflict between your personal, social, financial, or political interests and Summa's interests. A conflict of interest may arise as a result of an investment, interest, personal, or business relationship that prevents you from performing your duties or responsibilities in an impartial and effective manner in the best interest of the Company.

Conflicts of interest can also arise when you, a friend, or a family member gain improper personal benefits as a result of your position. You should be vigilant against situations that could lead to a conflict of interest and take appropriate measures, including disclosing any relationship that could be perceived as a conflict of interest. Any situations that may cause a conflict should be reported to the Compliance Officer.

Summa requires all Summa employees to report any relationships that may involve a potential conflict of interest, based on the information they have, using the Conflict of Interest Disclosure Form. All Summa employees are obligated to provide accurate information in this regard.

For more information, please refer to Summa's Conflict of Interest Prevention Procedure and Related Party Transactions Procedure.

13. Anti-Bribery and Corruption

It is never acceptable to make or offer a payment of material or immaterial value in order to gain an advantage, as this could expose you and Summa to potential criminal or other legal actions. As a condition for starting or continuing a business relationship with the company, no payments, credits, recruitment or hiring promises, investment opportunities, vacation trips, gifts, or entertainment, whether directly or indirectly, should be requested or accepted from any third party (e.g., agency, consultant, and supplier).

Due to the nature of our business, we frequently need to establish relationships with official institutions around the world. Relationships with officials in these institutions are subject to complex legal regulations. We are committed to complying with all anti-corruption laws, including those related to actions that could be considered bribery.

Summa may also be held accountable for improper payments made by third parties acting on our behalf. This prohibition applies to third parties, whether individuals or legal entities, such as contractors, business partners, consultants, travel agencies, regardless of their nationality.

Violation of anti-bribery laws can lead to fines and imprisonment. Summa absolutely prohibits bribery worldwide. Bribery is the offering, promising, giving, or accepting of anything of value, directly or indirectly, to influence or corrupt any person in the performance of their duties, even if for a legitimate purpose. Such value or advantage may include money, but also credits, gifts, entertainment, travel, or any other benefit. If you have any doubts about this matter, please consult your manager and the Compliance Officer.

For more information, please refer to Summa's Anti-Bribery and Corruption Policy ("ABC Policy").

14. Gifts, Hospitality, Donations, Sponsorship

To give or receive gifts, donations, sponsorships, event invitations, and entertainment tickets to or from our suppliers, customers, or others doing business with Summa, or the membership in any association or organization, if not properly managed or reasonably executed, may lead to negative perceptions about our decisions and business ethics, and can impact our brand and reputation.

Any Third Party with a business relationship with Summa may have a specific procedure that prohibits its employees from accepting any gifts or meal invitations, even if of minimal value. Summa employees must strictly comply with the procedures of these Third Party Companies.

Subject to the applicable rules, you may offer or accept gifts, donations, sponsorships, event invitations, and entertainment invitations.

For more information, please refer to Summa's Anti-Bribery and Corruption Policy ("ABC Policy"), the Gifts and Hospitality Procedure, and the Donations and Sponsorship Procedure.

15. Doing Business Fairly and Ethically

Each of us must act fairly, honestly, and ethically in our relationships with customers, suppliers, competitors, business partners, and others we interact with. We must not gain an unfair advantage over anyone through manipulation, concealment, misuse of confidential information, misrepresentation of material facts, or any other unethical practices. Our sales and marketing information and promotions must be honest and accurate and must never be misleading.

SUMMA

There are numerous laws that can impose severe criminal and legal penalties not only on the company but also on employees if we fail to act fairly, legally, and ethically.

16. Competition Laws

We must be careful not to share information with our competitors or cooperate with them in ways that would hinder free competition.

Summa complies fully with the relevant competition laws worldwide, ensuring fair competition and ethical trade practices. The rules governing this area are quite complex and vary from one country to another. Generally, these laws prohibit agreements or actions that unfairly restrict trade or reduce competition. The penalties for the company and its employees can be severe. If your work involves communication with competitors, you must be fully aware of the applicable procedures and ensure full compliance with the obligations.

17. International Trade Sanctions

Some countries have a variety of laws that restrict or prohibit doing business with specific countries and parties. Similarly, while most countries impose various restrictions on international trade, particularly on imports and exports, other countries may restrict or ban commercial activities related to certain products and technologies. We are responsible for international transactions; therefore, we should learn about these laws and how they are enforced and comply with them.

18. Prevention of Money Laundering

Money laundering is a process where criminals first conceal the origin of illicit funds and then integrate these funds into the system by converting them into seemingly legitimate income.

We should protect the reputation of our Company and improve the principle of honesty by cooperating with the authorities to reveal the possible money laundering activities.

19. Use of Company Computers and the Internet

If you use the company's electronic equipment for possible personal purposes, your personal privacy regarding information sent, received, or stored through the company's communication systems is not guaranteed.

In addition, all documents, including electronic correspondence, are the property of the Company and are subject to any review at any time without notice.

You may not use the company's computer resources or communication systems for communications that involve or promote any of the following: use of abusive or offensive language; sharing illegal, unethical, or obscene information; sending messages that may lead to the loss or damage of the recipient's business or systems; sending defamatory or libelous messages; any interference with an employee's or others' work; or making requests for any inappropriate or unauthorized purposes.

20. Environmental Protection

Summa reduces the harmful environmental impacts of its business operations, uses necessary resources in the most efficient way possible, and works towards the development and widespread adoption of environmentally friendly technologies.



21. Incident Reporting

Summa employees and Summa's third parties must report any concerns or suspicions regarding violations of the Code of Ethics to their respective managers, the Compliance Officer, or the relevant company officials at Summa. Such violation reports can also be made to Summa's Ethics Line at compliance@summa.com.tr.

For more information, please refer to Summa's Ethical Reporting Procedure.

22. Enforcement

The Code of Ethics comes into effect immediately after being approved by the Summa Board of Directors and shared with the company management and employees via email by the Compliance Officer; for third parties such as business partners, it comes into effect when published on the Summa website.

Violating the Code of Ethics may lead to disciplinary actions, including termination of employment or business partnerships, for Summa employees, officials, managers, and third parties.

Approvals (Names, Signatures, and Signature Dates):

23. Declaration and Commitment

I have read and understood the rules outlined in the Summa Code of Ethics, and I agree, declare, and commit to adhering to these rules.

(If you are an employee)

Name, surname, signature, and date

(If you are a third party)

Company name and stamp; name, surname, position, signature, and date of the legally authorized signatory