

BUSINESS CONTINUITY MANAGEMENT POLICY

1. Introduction

The impact of unplanned or unexpected disruptions to businesses can be immense. These range from financial losses, employee and our customer safety right through to reputational damage. The continuity of business operations in the event of adverse or unexpected incidents is important to SunExpress to meet business goals, including customer expectations. For this reason, Business Continuity Management is essential in ensuring that plans and preparations are made to provide for response and recovery from unexpected events or disruptions to our business.

2. Purpose

The purpose of the SunExpress Business Continuity Management policy is to ensure the continuity of critical business processes and flight operations in the event of a disruption, crisis, or disaster. This policy supplements and reinforces other SunExpress policies, practices and procedures connected to business operations, safety, and security. This policy also helps ensure that colleagues are aware of requirements to embed business continuity practices into their processes.

3. Scope

This policy applies to all SunExpress business units within the scope of Business Continuity Management and to relationships with critical third parties or suppliers of the company.

4. Objectives

- Ensure safety of employees, customers, stakeholders and interested parties in an emergency.
- Limit the effects of a potential business interruption within a defined time scale at acceptable levels.
- Enhance organizational resilience.
- Ensure the continuity of its services as laid down under BCM Manual Chapter 4.3 in line with current SunExpress' strategies.
- Continuous improvement on the Business Continuity Management System based on ISO 22301 Business Continuity Management System Standard as well as considering the legal obligations.
- Meet regulatory and other requirements in accordance with expectations of interested parties.

5. Management Statement

Management is committed to ensuring that SunExpress business obligations including contractual, legal, and regulatory requirements are always met. The continuity of critical business processes and functions is the responsibility of everybody including business partners and third parties. Business continuity shall be undertaken without compromise to corporate reputation or values, social responsibility obligations, with priority given to safety and the preservation of life and environmental considerations.

5.1 Management Intent

It is the intent of management that:

- Business units identify their critical processes and underlying dependencies.
- Arrangements are made by owners to ensure continuity of critical processes.
- Expected recovery periods which satisfy business requirements are defined.
- Business continuity plans are available, maintained and tested.

March 2026



Marcus Schnabel
CEO



Tuncay Eminoğlu
Deputy CEO