



SunExpress

MANAGEMENT POLICY Nr. 2 SECURITY POLICY

SunExpress is committed to continuously improving its culture that has security as a fundamental operational priority. Complying with all applicable national and international civil aviation security legislation and regulations' requirements, meeting all their standards, continuously adapting to industry best practices for security management and providing appropriate resources at all levels of the organization ensures the security interests of our employees, customers, shareholders, assets, brand and external service providers.

Proactive and systematic management of security is regarded as a responsibility throughout all levels of management. Starting with the Accountable Manager, all Directors, Nominated Persons, Senior Managers and Managers are responsible for enforcing and maintaining the highest level of security performance. The responsibility to act accordingly rests with all SunExpress employees and external service providers.

This is enabled through;

- the fostering an effective security culture protecting the safety and security interests of our employees, customers, shareholders, assets, brand and external service providers,
- maintaining the ability to adapt to changing demands,
- the provision of adequate resources,
- management of security and safety risks to aircraft operations,
- the promotion of security awareness,
- highly developed threat assessment and risk management processes,
- continual management review and improvement of the SeMS (Security Management System) and security culture and encouraging adoption by SunExpress's external service providers,
- regular analysis of undesirable security operational results,
- follow-up of corrective actions and their effectiveness in improving operational performance,
- ensuring that throughout the organization SeMS principles are understood and adhered to,
- developing security objectives for the measurement of security performance, and
- writing imperatives for including operational security in the description of duties and responsibilities of senior and frontline management;

We intend to maintain and, where deemed necessary, improve security levels and to minimize the risk of an occurrence or an incident as low as reasonably practicable. The purpose of security reporting and internal investigations is to improve and enhance security, not to assign individual blame. SunExpress's reporting system supports a just security culture environment.

SunExpress encourages its employees to provide or report essential information and does not take any disciplinary action against any of its employees who disclose a security concern through the reporting system unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of legislation or our procedures.

SunExpress Security Management controls yearly established security KPIs (Key Performance Indicator). Our security performance is established and measured via the KPIs/Set Targets established annually and then the KPIs are reviewed to allocate resources to achieve such security objectives. Strategic goals of the SeMS are also expressed as corporate security objectives.

The Security Policy is communicated by ensuring a free flow of information via all available tools and with visible endorsement throughout SunExpress and reviewed annually according to CIM (Corporate Identity Manual) to ensure it remains relevant, up-to-date and appropriate to our organization.

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Marcus Schnabel
CEO


Tuncay Eminoğlu
Deputy CEO