

TURK HAVA YOLLARI ANONIM ORTAKLIGI

Modern Slavery Statement (Canada, UK and Australia)

Reporting Year: 12 months ending 31 December 2025

1 Introduction

- 1.1 At TURK HAVA YOLLARI ANONIM ORTAKLIGI (“**THY**”), operating as **Turkish Airlines**, we are committed to acting ethically and with integrity in all of our business dealings and relationships, and to promote compliance with applicable laws and protect the dignity and rights of all people connected to our business.
- 1.2 This is THY’s modern slavery statement pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2024, c. 9), UK’s *Modern Slavery Act 2015* (s. 54) and Australia’s *Modern Slavery Act 2018* (Cth). Our reporting outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chains.

2 Our organisational structure, business operations and supply chains

- 2.1 THY is incorporated in Türkiye and listed on the Borsa Istanbul (Istanbul Stock Exchange). Its largest shareholder is Türkiye Wealth Fund (49.12% as at 31 December 2025). Detailed information regarding our organisational structure, business operations and supply chains is available on our Investor Relations website, including in our 2025 Integrated Annual Report which is available at:
- https://investor.turkishairlines.com/documents/thy_frae_2025_uyg_uyg38_yuksek-1.pdf
- 2.2 THY operates in the air transportation sector and is the flag air carrier of the Republic of Türkiye, headquartered in Istanbul, Türkiye. Its primary business is the provision of air transportation services for both passengers and cargo and associated goods and services.
- 2.3 Relevant information relating to its business operations from the 2025 Integrated Annual Report include:
- (a) 100,111 employees;
 - (b) owner and operator of 516 aircraft;
 - (c) operates flights across 356 destinations globally; and
 - (d) served 92.6 million passengers in 2025.
- 2.4 THY is not primarily involved in the production (manufacturing, extracting, growing, or processing) or selling of goods as part of its core business operations.
- 2.5 As part of our supply chain, we engage various suppliers such as fuel suppliers, aircraft manufacturers, caterers, baggage handlers and maintenance service providers. During the reporting period, we engaged a number of suppliers the majority of which were locally based, as disclosed in the 2025 Integrated Annual Report. The largest supplier expenditures were for aircraft fleet and parts, aviation fuel, aircraft maintenance, ground-handling and in-flight catering and retail.

- 2.6 To learn more about our organization, including our corporate structure, please visit:
<https://investor.turkishairlines.com/en/>

3 **Forced or child labour risks and steps taken by THY to assess and manage these risks**

- 3.1 Operations and supply chains within THY's business which present higher risks of modern slavery include:

- (a) **Goods and Services** – THY procures various goods and services to operate its business. Depending on the industry and the jurisdiction of origin, the manufacture or delivery of such products and services could present increased risk of involving practices which constitute modern slavery. This includes industries which rely heavily on low-skilled or migrant labour (for example, cleaning and maintenance services), are highly competitive with low barriers to entry (for example, textile production or electronics manufacture), or are based in countries with low labour protections, poor governance or low socioeconomic status.
- (b) **Contracted labour** – THY uses contracted manpower in some parts of its business (for example, ground handling and cabin cleaning) which could present a risk of exposure to hidden labour exploitation, including debt bondage via third parties including recruitment agents.
- (c) **Fuel** – there is a risk that suppliers or sub-suppliers of fuel and other fuel-related products used by THY (eg oils and lubricants) use exploited labour in the production of fuel, construction or maintenance of fuel production facilities, transportation of fuel or other components of the supply chain.
- (d) **Food and beverage** – the harvesting of raw ingredients and processing of food products and beverages for meals served in THY flights or lounges, carries heightened risk of involving exploited labour.
- (e) **Commercial flights** - there is a risk that the services provided by an international airline such as THY could be used by human traffickers to transport vulnerable victims for the purposes of providing forced labour or other forms of exploitation.

- 3.2 At this time, THY has not identified forced labour or child labour risks in its activities and supply chains. However, building on the policies and procedures we currently have in place, THY has adopted corporate policies and developed and implemented strategies to assess and manage forced labour and child labour risks.

- 3.3 THY undertakes to respect human rights and to operate in compliance with the international principles, standards specified in the Universal Declaration of Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the United Nations Women's Empowerment Principles (WEPs), the Worst Forms of Child Labor Convention (ILO/No.182), and applicable local legislation in all its operations, particularly in the scheduled, unscheduled commercial passenger and cargo air transportation services on domestic and international lines, and training services.

- 3.4 THY workers are employed in accordance with fair and responsible employment practices in place to protect and promote workers' rights. THY has implemented a Human Rights and Employee Rights Policy ("**Policy**"):

<https://www.turkishairlines.com/en-ca/press-room/about-us/our-policy/>

- 3.5 In accordance with the Policy, under the roof of THY, no one may be forced to work without their own consent and by preventing them from exercising their legal rights. THY is against any practices in violation of human rights such as illegal employment of immigrants, employment of foreign national employees without work permits, indentured servitude, and forced labour including any kind of human trafficking.
- 3.6 THY is aware of the importance of ensuring the intellectual, physical, and psychological health of children. THY acts in compliance with the national and international laws and other requirements, the International Labor Organization (ILO) Minimum Age Convention dated 1973 in particular, on the use of child labour, and child labour is never used in any one of its activities.
- 3.7 THY also collaborates with various industry initiatives and organizations dedicated to combating forced labour and child labour. This cooperation helps Turkish Airlines stay informed about best practices and emerging risks, and it provides a platform for sharing knowledge and resources.

4 Due diligence processes

- 4.1 As part of its due diligence practices, THY has embedded responsible business conduct into policies and management systems, as set out in the Policy referred to above.
- 4.2 For ongoing suppliers, THY applies a risk-based monitoring and due diligence approach in relation to human rights, child labour, forced labour and ethical business principles. This may include supplier questionnaires and Know Your Customer processes, general KPI reviews, general compliance reviews, and targeted audits or inspections in higher-risk areas or where concerns or complaints are identified. Where non-compliances are identified, THY works together with suppliers to take remedial steps.
- 4.3 THY also requires potential business partners to complete a 'Know Your Customer Form' to assess their internal policies in areas including human rights and ethics, before any decision to collaborate or conduct business with the business partner.

5 Supplier adherence to our values

- 5.1 THY has implemented a Supplier Code of Conduct (the “**Code**”) that outlines its expectations regarding ethical behaviour, including respect for human rights and the prohibition of forced labour and child labour.
- 5.2 Under the Code, suppliers are expected to adhere to international labour standards and take action against instances of modern slavery, human trafficking, forced labour and involuntary servitude. The Code is also used as a benchmark by THY when reviewing its purchasing practices with suppliers. The Code can be accessed here:

<https://investor.turkishairlines.com/documents/sustainability/supplier-code-of-conduct-policy.PDF>

- 5.3 In addition to new supplier screening and risk-based monitoring and due diligence measures in relation to ongoing suppliers, THY also promotes adherence by including provisions on human and employee rights and ethical standards in its supplier contracts or attaching THY policy documents to supplier contracts. Compliance with these provisions or documents may be subject to review or audit where deemed necessary based on risk assessments.

6 Human rights training

- 6.1 THY intends to organize future training program to raise awareness about modern slavery and human rights issues. This program will aim to educate cabin crew, on how to recognize and report any signs of unethical human rights practices. As a next step, the training is planned to be expanded across the THY and made available to a wider group of employees.

7 Remediation measures

- 7.1 During the reporting period, THY did not identify any instance of forced labour or child labour in its operations or supply chains that required remediation by THY.
- 7.2 Suppliers are required to report instances of modern slavery under the Code. In the event THY becomes aware of any modern slavery practices amongst suppliers (whether through supplier self-reporting, audits or other means), THY will take relevant steps to remediate, such as:
- (a) requiring suppliers to submit actions plans to improve compliance, which will be audited and verified;
 - (b) requiring suppliers to undertake development programmes to improve compliance; or
 - (c) reconsidering relationships with suppliers in accordance with the Code and any other contractual arrangements with the supplier.

8 Remediation measures relating to loss of income to vulnerable persons

- 8.1 We recognise that instances of modern slavery and human trafficking often impact the human rights of particularly vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women, or children. At this time, we have not been required to undertake remediation measures relating to loss of income to vulnerable persons.

9 Effectiveness in combatting modern slavery risks

- 9.1 THY is committed to conducting regular reviews of THY's policies relating to forced/child labour to assess their continued effectiveness, and to put in place measures where any issues are found.
- 9.2 As noted above, THY undertakes risk-based monitoring and due diligence activities in relation to suppliers, including audits where considered necessary- these measures enable THY to assess effectiveness of its measures against modern slavery within its supply chains. Supplier audits assess metrics including whether suppliers have policies dealing with labour and human rights and compliance with contractual obligations and legal requirements (including those relating to modern slavery and human rights).
- 9.3 Outside of supplier audits, THY also tracks the number of suppliers placed on development programmes to improve human rights compliance following an audit, and the number of suppliers who successfully complete the development programme.
- 9.4 Over subsequent reporting periods, THY aims to review and enhance the metrics it uses to assess the effectiveness of its actions, in line with continuous improvement.

10 Consultation with owned or controlled entities

- 10.1 During the reporting period, in accordance with its policy, Turkish Airlines consulted with its material subsidiaries and affiliates as part of its consolidated sustainability strategies (including in relation to modern slavery risks, child labour, forced labour and ethical business principles) by conducting general framework briefing meetings and assisting with group level sustainability training sessions designed to enhance the sustainability awareness of affiliates to meet the THY's standards. The sustainability training covers areas including best practice and new developments in line with the corporate governance reporting practices.

11 Approval of the Statement

- 11.1 This statement was approved by the board of directors of TURK HAVA YOLLARI ANONIM ORTAKLIGI on 12 June 2026 and is signed by Prof. Murat Şeker as director of TURK HAVA YOLLARI ANONIM ORTAKLIGI.
- 11.2 For the purposes only of section 54 of the UK *Modern Slavery Act 2015*, and the requirements of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (**Canadian Act**) and in particular section 11 thereof, and for no other purposes, I, in the capacity of Chairman of the Board of Directors and the Executive Committee, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Act and of the UK *Modern Slavery Act 2015*, for the reporting year listed within this report.

Signed

By: 

Prof. Murat ŞEKER

Chairman of the Board of Directors and the Executive Committee

Date: 12 June 2026

I have the authority to bind THY.