

	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. ENTRY</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM002</b>
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**Royal Stone Houses with a magnificent valley view - Göreme - offers all the quality comforts and details you need for a pleasant stay in Cappadocia. Located among the “fairy chimney” rock formations, Göreme is a town in Cappadocia, a historic region of Turkey. Situated in the province of Nevşehir in Central Anatolia, it was added to the UNESCO World Heritage List in 1985.**

**Aiming to provide the highest quality service in the comfort of your home, Royal Stone Houses - Göreme consists of four different blocks. The reception, restaurant, lounge, and offices are located in our first block, “Princess House.” Royal Stone Houses - Göreme's 26 carefully decorated rooms are located in the Prince House, King House, and Queen House blocks.**

#### **OUR VISION**

**To be a leading, innovative, and corporate brand in our sector, aiming for continuous improvement and progress with a sense of social responsibility and sensitivity towards the environment, while prioritizing guest satisfaction with a friendly and high-quality service approach.**

#### **OUR MISSION**

**To contribute to national tourism by providing high-quality services with a universal approach, while ensuring guest satisfaction.**

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The tourism sector depends on natural, historical and cultural resources. For this reason, it has been our main principle to protect natural, cultural and historical resources and to work for the benefit of our employees and local people. Based on the concepts of Sustainable Tourism, Sustainable Development and Environmental Protection, in all processes in our Royal Stone Houses Göreme hotel;

- To comply with international legal regulations, environmental laws/legislation and other obligations approved by the Official Authorities,
- To contribute to continuous improvement through action plans by establishing environmental risks and targets,
- Communicate with all relevant parties and share information when necessary,
- Supporting and participating in environmental activities of public and private organizations,
- Protect natural resources and use them in the most efficient way,
- Preventing the factors that cause pollution of nature and reducing the carbon footprint,
- To keep potential environmental impacts under control from the design phase to the end of the life cycle; to reduce damages,
- Reducing or controlling and recovering wastes at source as much as possible in order to prevent pollution,

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- Using environmentally friendly products by adopting the concept of life cycle,
- To make efforts to ensure sustainability in the supply chain and to be able to implement fair trade practices,
- Prefer regional and local suppliers and partners,
- Minimizing the CO2 emissions of delivery vehicles by selecting as close as possible in the procurement process and reducing the emissions to be released to nature,
- Support the conservation of local or international biodiversity,
- To ensure that all kinds of waste generated at the end of the activities carried out in our hotel are separated at the source according to their characteristics, collection, temporary storage, recovery, transportation, disposal and control after disposal,
- To ensure all kinds of monitoring, measurement, analysis and control in order to minimize the environmental impacts resulting from our activities and to prevent environmental pollution,
- To act in accordance with the Regulation on the Assessment and Management of Environmental Noise,
- To reduce the energy consumed as much as possible by using energy efficient machinery and equipment,
- To increase the environmental responsibility awareness of all our employees and suppliers by providing visual and practical trainings on the environment to all our employees in our facility,
- To organize trainings with all our employees in order to continuously increase our personal development, skills, experience and knowledge,
- To fully comply with all laws regulating human rights and labor,
- Paying utmost attention to ensuring equal opportunities in recruitment processes, improving working standards, and following a fair and transparent recruitment policy,
- To ensure the employment of all individuals who have the education, experience and competencies required by the position they will work in, as well as personality traits compatible with our corporate culture and values, in all positions, including management, without discrimination due to age, race, gender, religion, disability, socio-economic status, etc,
- To provide equal, standardized and safe working conditions for all our employees,
- To create a healthy and safe working and living environment for all our employees, subcontractors and guests,

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- To identify the hazards and risks that our employees may be exposed to in advance and to prevent possible occupational accidents and occupational diseases,
- Collecting feedback from employees to improve their well-being in the workplace,
- To support all kinds of initiatives that can be beneficial for the development of our region,
- To ensure that our personnel establish a harmonious relationship with the local people,
- To support foundations, associations and unions established for regional development and to cooperate in all possible processes; to support the wishes and work of Civil Society Organizations,
- To take care to take part in Social Responsibility Projects,
- To develop social projects that will contribute to the social and economic development of the community and local stakeholders and local employment, and to create opportunities for cooperation,
- Protect and respect the historical and cultural differences in the geography in which we operate,
- To endeavor to strengthen and carry cultural heritage to future generations,
- Enabling the use and development of innovative technologies that will contribute to sustainable development,
- Adapting the right digital transformation processes to the business by analyzing environmentally friendly results in order to expand sustainable, flexible, transparent, fast business processes and increase efficiency,
- Encourage our guests to discover the destination's history, culture, traditions and local products and services offered by our local community,
- Provide guidance on how to behave responsibly with regard to local people, flora and fauna outside the facility,
- To support stakeholder participation in decision-making processes by taking into account the wishes and expectations of stakeholders,
- To make the sustainability perspective a corporate culture and to raise awareness in this area among both employees and stakeholders,
- Measuring and evaluating the economic, environmental and social impacts of all activities and taking improvement actions to mitigate negative impacts,
- We aim and we are committed.

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. WASTE MANAGEMENT POLICY</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM003</b>
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**Our ROYAL STONE HOUSES hotel has a Zero Waste Certificate as part of the Zero Waste Project. In our processes, we apply policies to reduce, separate, and reuse waste generated within our facility, taking into account the product life cycle.**

**Our facility generates both industrial hazardous and non-hazardous waste. Hazardous waste is collected in a temporary storage area authorized by the Provincial Directorate of Environment, Urbanization, and Climate Change, and transported to licensed facilities using licensed vehicles and drivers via the MOTAT (Mobile Waste Tracking) system.**

**Non-hazardous waste is also collected in the non-hazardous waste temporary storage area and transported to licensed facilities. These processes are managed by our facility's authorized personnel.**

**Nearly 100% of the hazardous and non-hazardous waste generated at our facility is recycled by licensed facilities as plastic, wood, metal, batteries, oil, etc. Food waste from kitchens and restaurants is sent to feeding points for street animals to prevent waste.**

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	<b>ROYAL BALON AND AVIATION OPERATIONS TOURISM TRADE INC. DIVERSITY POLICY</b>	<b>Publication Date: 01.06.2023</b>
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Throughout its history, Royal Stone Houses hotel has demonstrated a strong commitment to people and our values.

By leveraging the creativity and innovation of people with diverse experiences, perspectives, and cultures, we believe that a diverse workforce helps our company and employees realize their true potential. It also enables us to better understand and respond to our diverse and changing global guest base and respond to social change.

## **PURPOSE**

The purpose of this policy is to create and maintain a working environment where employees are treated with dignity and respect, and where there is no discrimination.

Royal Stone Houses hotel does not discriminate against any employee or job applicant on the basis of gender, age, race, ethnic origin, religion, marital status, sexual orientation, socioeconomic status, physical abilities, or political beliefs. Furthermore, Royal Stone Houses adheres to the principles of non-discrimination and equal opportunity in all environments where it conducts its activities.

Royal Stone Houses supports talents with different knowledge, skills, and educational backgrounds that are appropriate for the requirements of the job. In this regard, Royal Stone Houses plans the necessary roadmaps to attract, develop, and retain talents.

## **SCOPE**

This policy aims to be binding on all Royal Stone Houses hotel employees, as well as all stakeholders and local communities with any commercial and/or sectoral ties to Royal Stone Houses.

Within the scope of the above Purpose and Scope, Royal Stone Houses hotel conducts activities related to training and guiding individuals within the framework of diversity and equal opportunity, which are among the hotel's values. The Board of Directors commits to fulfilling the requirements specified in this policy and expects Royal Stone Houses hotel employees to fulfill the same commitments.

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### **Diversity and Inclusion in Practice**

- In accordance with Royal Stone Houses Values, every employee and leader at our Royal Stone Houses hotel is expected to:
- Promote and create a participatory environment,
- Treat all employees fairly, equitably, and respectfully,
- Attract, develop, and retain people with diverse talents and backgrounds to Royal Stone Houses. This enriches our company and culture by:
- Creating a highly productive, diverse, and participatory work environment by enhancing our reputation as an employer of choice for top talent.
- Deepening our understanding of customers and markets to deliver superior products and services in a rapidly changing market.
- Maximizing innovation opportunities by leveraging the diverse perspectives, skills, and experiences of our employees and stakeholders.
- Adapting and responding with agility to a global society driven by constant change.
- Create sustainable growth and value for our shareholders.

### **Key Focus Areas**

- **Recruitment:** We focus on different skills in job applicants. We encourage and facilitate the recruitment of a diverse workforce.
- **Compensation:** We ensure gender-based pay equality and inclusive benefit policies that guarantee fairness and respect for each individual.
- **Performance Management and Development:** We ensure that all employees have equal opportunities for career, personal, and professional development.
- **Policies, processes, talent, and rewards strategy:** We align with our Diversity Policy and update it as needed.
- **Education:** We raise awareness about the importance of diversity and inclusion by providing training to avoid unconscious biases within our organization and in our business relationships.

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### **Royal Stone Houses Hotel Foundations:**

Ethical rules and policies, including Royal Stone House Foundations, are essential for ongoing employment processes at Royal Stone Houses Hotel.

### **Ownership**

The HR Manager is responsible for implementing the principles and practices of this policy.

### **Complaints Policy**

Employees who believe that the commitments set out in this policy have not been fulfilled, who wish to ask a question about this policy, or who wish to discuss a possible violation, can contact Royal Stone Houses hotel at the email address [info@royalstonehouses.com](mailto:info@royalstonehouses.com) .

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. ENVIRONMENTAL POLICY</b>	<b>Publication Date: 01.06.2023</b>
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## **OBJECTIVE**

**As Royal Stone Houses hotel and its employees, we aim to become a leader in environmental issues on a national and international scale and to continuously improve and maximize our environmental performance by adopting sustainable development strategies in the 3-star hotel sector in line with the United Nations sustainable development goals and circular economy principles.**

## **SCOPE**

**This policy covers**

**Royal Stone Houses Hotel,**

**all employees of Royal Stone Houses Hotel,**

**and personnel included in contracts with suppliers, contractors, subcontractors, and other organizations.**

**The Board of Directors is committed to fulfilling the requirements outlined in this policy and expects its employees to do the same.**

**To achieve our goals;**

**We will continuously review and improve our environmental management by complying with relevant national and international requirements beyond the applicable environmental legislation, report our environmental impacts annually in our sustainability reports,**

- Defining all environmental dimensions using a life cycle approach and assessing their impacts, eliminating and improving environmental risks, reducing them to acceptable levels, preventing pollution in order to achieve the established goals and objectives, and protecting the environment and natural resources targets.**
- Conducting the necessary work on the efficient use of natural resources, reduction of carbon dioxide emissions and intensity within the scope of combating climate change, setting and monitoring the relevant objectives and targets, reviewing changes, and increasing efforts on the use of renewable energy sources and energy efficiency in this direction**

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- **Adopting sustainable, efficient, and economical use of resources such as water, energy, raw materials, chemicals, etc., during our activities to reduce consumption, and preventing and reducing waste generation from our activities within the framework of the circular economy, as well as minimizing all emissions, greenhouse gas emissions, and environmental impacts. adopting clean production technologies and best available techniques that will prevent or reduce the formation of any kind of emissions, greenhouse gas emissions, and minimize their impact on the environment,**
- **In all our processes, we ensure the procurement of products and services that are highly energy efficient, have minimal environmental impact, and are sustainable, support designs that focus on energy performance, and strive for continuous improvement.**
- **We respectfully approach our employees, guests, government agencies, suppliers, shareholders, stakeholders, and the community in matters related to environmental protection, and we fulfill our environmental responsibilities in line with the needs and expectations of all our employees and stakeholders. To this end, we prepare and transparently share our environmental reports on a regular basis, monitoring and continuously improving our environmental performance, and engaging in necessary information sharing, training, and other activities to raise awareness and improve understanding of environmental issues by facilitating communication and collaboration with all relevant parties.**

**We commit to this.**

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**Royal Stone Houses 3 Star Hotel aims to continuously improve energy efficiency. In this context, our sustainability committee is directly responsible for energy management. The committee has been established. Our energy consumption is monitored and reviewed on a daily, monthly, and yearly basis. Every month, Royal Stone Houses Göreme Hotel energy reports are updated to identify key energy usage points. Measures are taken to reduce consumption, and related investments are made.**

**In addition to these efforts, new investments are evaluated in terms of energy efficiency, and the goal is to reduce the specific energy intensity of new services to be produced.**

**In addition to efforts to increase energy efficiency, we are continuing our feasibility studies on the use of renewable energy with the aim of reducing our carbon footprint in line with sustainable development goals and the European Green Deal.**

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## **OUR BUSINESS ETHICS RULES**

### **Honesty**

**Honesty and integrity are our top priorities in all our business processes and relationships. We act with honesty and integrity in our relationships with our employees and all our stakeholders.**

### **Confidentiality**

**Confidential and proprietary information includes information that could put Royal Stone Houses Boutique Hotel (the Company) at a competitive disadvantage, trade secrets, financial and other information that has not yet been made public, information relating to employee rights, and information covered by “confidentiality agreements” entered into with third parties. As employees of Royal Stone Houses, we take care to protect the privacy and confidential information of our customers, employees, and other relevant individuals and organizations we work with. We protect confidential information related to the Company's activities, use this information only for the Company's purposes, and share this information only with authorized individuals within the scope of their authority.**

**For us, any commercial gain (insider trading), including the purchase or sale of shares on stock exchanges, through the disclosure of any confidential information belonging to the Company is absolutely unacceptable. When leaving the Company, we do not take any confidential information or documents, projects, regulations, etc. that we have access to due to our duties outside the Company.**

### **Protection of Personal Data**

**Employees shall not share, transfer, disclose, misuse, or otherwise exploit for personal gain, either verbally or visually, any personal data of a private or general nature belonging to the employer or employer's representatives, employees, subcontractor employees, customers, suppliers, third parties, guests, job applicants, interns, or any other individuals related to company activities, without the written consent of the data subject and the employer. verbally, or visually in an electronic environment without the written consent of the data owner and the employer, and may not misuse such data or use it to gain personal benefit.**

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### **Conflict of Interest**

As employees of Royal Stone Houses, we aim to avoid conflicts of interest. We do not seek personal gain from individuals or organizations with whom we have business dealings, either personally, through our family, or through our close associates, by taking advantage of our current position. We do not engage in any additional financial gain-based business activities outside of the company. We refrain from using the name and power of our Royal Stone Houses hotel, as well as the corporate identity of our Royal Stone Houses Boutique Hotel, for personal gain.

In cases of potential conflicts of interest, we apply methods that we believe will safely protect the interests of all parties involved through legal and ethical means. In cases of doubt, we consult with our manager, Human Resources, or the Company Ethics Committee Advisor.

### **Royal Stone Houses Boutique Hotel BUSINESS ETHICS RULES AND POLICIES OUR**

#### **RESPONSIBILITIES**

In addition to our legal responsibilities, we strive to fulfill the following responsibilities to our customers, employees, shareholders, suppliers and business partners, competitors, society, humanity, and on behalf of Royal Stone Houses Boutique Hotel.

#### **Our Legal Responsibilities**

We conduct all our domestic and international activities and transactions in accordance with Turkish laws and international law, and provide accurate, complete, and understandable information to legal regulatory institutions and organizations in a timely manner.

In conducting all our activities and transactions, we maintain an equal distance from all public institutions and organizations, administrative bodies, civil society organizations, and political parties without any expectation of benefit, and we fulfill our obligations with this sense of responsibility.

#### **Our Responsibilities to Our Customers**

We work with a proactive approach focused on customer satisfaction, responding to our customers' needs and requests in the shortest possible time and in the most accurate manner. We deliver our services on time and under the

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conditions we have promised; we treat our customers with respect, honor, justice, equality, and courtesy.

#### **Our Responsibilities to Our Employees**

We ensure that employees' personal rights are fully and correctly exercised. We treat employees with honesty and fairness, and commit to providing a non-discriminatory, safe, and healthy working environment. We make every effort to support the individual development of our employees, encourage them to participate in appropriate social and community activities with a sense of social responsibility, and strive to maintain a balance between their professional and personal lives.

#### **Our Responsibilities to Suppliers/Business Partners**

We act fairly and respectfully, as expected of a good customer, and take the necessary care to fulfill our obligations on time. We carefully protect the confidential information of the individuals and organizations we do business with and our business partners.

#### **Our Responsibilities to Our Competitors**

We compete effectively only in areas that are legal and ethical, and we avoid unfair competition. We support efforts to establish a competitive structure within society.

#### **Our Responsibilities to Society and Humanity**

The protection of democracy, human rights, and the environment; education and charity work; and the elimination of crime and corruption are very important to us. With the awareness of being a good citizen, we act responsibly as a pioneer in social issues; we strive to play a role in civil society organizations, public services, and appropriate activities in these areas. We are sensitive to the traditions and cultures of Turkey and the countries where we carry out international projects. We do not give or accept bribes or gifts, etc., that exceed the intended value.

#### **Our Responsibilities on Behalf of Royal Stone Houses**

Our business partners, customers, and other stakeholders trust us because of our professional competence and integrity. We strive to maintain this reputation at the highest level.

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We provide our services in accordance with company policies, professional standards, our commitments, and ethical rules, and we demonstrate the necessary dedication to fulfill our obligations.

We take care to provide services in areas where we believe we are and will be professionally competent, and we aim to work with customers, business partners, and employees who meet the criteria of accuracy and legitimacy. We do not work with those who violate public morality or harm the environment and public health.

When speaking on behalf of the Company in public or in areas where listeners perceive us to be representing the Company, we express only the Company's views, not our own opinions.

When faced with complex situations that could put the Company at risk, we first consult with the appropriate personnel, following the appropriate technical and administrative consultation procedures.

## **POLICIES SUPPORTING BUSINESS ETHICS RULES**

### **Conflict of Interest Policy**

It is essential that company employees avoid situations that may create a conflict of interest. It is the most important responsibility of all employees to refrain from using company resources, name, identity, and power for personal gain, and to avoid situations that may negatively affect the company's name and image. The following guidelines outline the situations that may give rise to conflicts of interest in the course of employees' duties or personal lives due to business relationships, as well as the principles that must be applied in such situations.

### **Application Principles**

#### **Activities That May Create Conflicts of Interest**

Company employees must fully comply with the situations listed below as activities that may create conflicts of interest and the principles specified. The company undertakes the necessary measures to encourage its employees to comply with these principles.

#### **Engaging in Activities That May Create a Conflict of Interest**

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**Employees shall not, under any circumstances, enter into a business relationship with family members, friends, or other third parties with whom they have a relationship that provides mutual or unilateral benefits. For example, an employee with purchasing authority should avoid doing business with a supplier where a family member works. Exceptions are subject to the knowledge and approval of the Company's Board of Directors. Similarly, Company employees should be mindful of potential conflicts of interest arising from close family members working for the Company's competitors.**

**Employees may not obtain any commercial benefit, including the purchase or sale of shares on the stock exchange, by leaking any information belonging to the Company from within, nor may they facilitate others in obtaining such benefits.**

**Employees must not engage in any work that would classify them as a “trader” or “merchant,” either directly or indirectly, and must not work for another person and/or institution in exchange for wages or similar benefits, whether during or outside of working hours, under any name whatsoever. However, employees may work for another person (family member, friend, other third parties) and/or institution outside of working hours in exchange for wages or similar benefits;**

- **Not creating a conflict of interest with the duties they perform at the Company,**
- **Not creating incompatibility with other business ethics rules and policies that support these rules,**
- **Not negatively affecting their duties at the Company,**
- **Possible with the written approval of management.**

**Approval is given by the Company's Board of Directors for the General Manager, and by the Company's Ethics Committee Advisor, with the opinion of HR, for other employees.**

**Employees may not serve on the board of directors or as auditors of other companies without the approval of the Company's Board of Directors; they may not take on roles in competing companies or companies with which the Company has business relationships. In non-profit organizations and universities, they may engage in social**

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responsibility and charitable roles with the written approval of management, provided that such roles do not interfere with their duties within the Company.

Managers who are in a position to make hiring decisions may not hire their spouses, close relatives, or close relatives of these individuals.

Employees may speak and write professionally on topics that are not related to the company and its activities and do not conflict with its policies. In order to use the company name in these activities, approval must be obtained from the Deputy General Managers.

Employees may actively participate in any political party on an individual and voluntary basis. Managers may not ask employees to engage in political activities or join a political party. Employees may hold office in any political party under the conditions specified below and with the written approval of management.

- Employees must not engage in any political activity that creates a conflict of interest with their duties at the company.
- Employees may not engage in any political activity during working hours and may not take up their colleagues' time for such activities.
- Employees may not use the company name, their position at the company, their title, or company resources during political activities.

Approval for employees wishing to participate in political activities is granted by the Company Management Board for Deputy General Managers and by the Company Ethics Committee Advisor, with the opinion of HR, for other employees.

Employees may personally provide financial or moral assistance and/or donations to third parties outside the Company and may participate in charitable organizations.

#### **Misuse of Authority**

It is unacceptable for employees to use their authority for their own benefit and/or that of their relatives and to cause damage to the Company by failing to exercise the due care expected of them.

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**Employees may not derive any direct or indirect personal gain from the Company's purchasing and sales activities or from any transactions or contracts to which the Company is a party.**

**Employees may not engage in acts or behaviors that are contrary to ethics, the law, or Company discipline.**

#### **Use of Resources**

**When using resources on behalf of the Company, the Company's interests shall be taken into account. Without the Company's interest, Company assets, facilities, and employees may not be used outside the Company, regardless of the name under which and for whose benefit they are used. The principle of “economy in all matters” shall be applied by all employees.**

**The proper use of resources for the benefit of the Company also requires the proper use of time. During working hours, employees use their time wisely and do not devote time to personal matters. Managers may not assign employees to perform personal tasks.**

**As a general rule, private visitors are not accepted during working hours. Employees must complete meetings with mandatory visitors in a reasonable amount of time, in connection with the subject of the visit and without disrupting the workflow.**

#### **Relationships with Other Individuals and/or Organizations with Whom the Company Has Commercial Relations**

**The Company may not enter into special business relationships with its customers, subcontractors, or suppliers, or with other individuals and/or organizations with which the Company has commercial relations. The Company may not borrow money and/or purchase goods/services for personal purposes, nor may it lend money and/or provide goods/services to other individuals and/or organizations with which the Company has commercial relations.**

**The following considerations apply to relationships with customers: no transaction may be conducted without the customer's knowledge, even if it is in the customer's favor; no advantage may be taken of customer weaknesses, even if it is in the Company's favor; and no profit may be sought by providing incomplete or incorrect information to the customer.**

<b>PREPARED BY</b>	<b>APPROVED BY</b>
<b>HİLAL YILMAN</b>	<b>MEHMET DİNLER</b>

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**Employees may not request or hint at gifts from other individuals and/or organizations with which the Company has commercial relations; they may not accept any gifts, money, checks, property, free vacations, special discounts, etc. that would place the Company under any obligation. No personal assistance or donations may be accepted from any individual or organization with which the Company has a business relationship. The Gift Acceptance and Giving Policy applies to this matter.**

#### **Media Relations**

**In relations with the media, the Company Communication Policy shall be followed. Giving statements to any media outlet, conducting interviews, participating as a speaker at seminars, conferences, etc. is subject to the approval of the Deputy General Managers. No personal gain may be derived from these activities.**

#### **Representing the Company**

**Any fees incurred as a result of duties performed on behalf of the Company in any association, employer union, or similar civil society organization shall be donated to the relevant institution or the channels designated by the relevant institution.**

**Payments made by third parties to Company employees for seminar speaker fees or similar services shall also be donated to the relevant institution or the channels designated by the institution in a similar manner. These individuals may receive awards, plaques, or similar gifts of symbolic value as a memento of the day, in addition to monetary compensation.**

#### **Gift Acceptance and Giving Policy**

**Employees shall not accept gifts or benefits that could influence their impartiality, decisions, or behavior, nor shall they attempt to provide gifts or benefits to third parties and organizations that could create such influences. The guidelines outlined below regulate gift exchanges between employees and third parties or organizations with whom they have a business relationship and establish the principles to be applied in this regard.**

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### **Application Principles**

**1. Employees are prohibited from accepting any benefits or gifts, whether of economic value or not, that may influence or have the potential to influence their impartiality, performance, or decision-making while performing their duties.**

**2. Employees may accept and/or give gifts that are:**

- **Consistent with the institution's business objectives,**
- **In compliance with applicable laws and regulations, and**
- **The disclosure of the gift to the public will not place the Company in a difficult position.**

**3. Subject to the conditions specified in Article 2;**

- **Employees may give and receive entertainment, hospitality, and meals in accordance with generally accepted standards in the business world, provided that they comply with the principles set forth in the relevant documents regulating the Company's authorities.**
- **Gifts such as awards, plaques, etc., which have symbolic value and are given as a memento of the day, may be accepted at seminars and similar events attended on behalf of the Company, provided that they are not monetary in nature.**

**4. In the situations mentioned above and for other gifts, benefits, vacations, discounts, etc. other than money, if the total value of the gifts received in each calendar year and from each individual/institution giving the gift is less than 250 TL, approval is not required, provided that the conditions listed in Article 2 are met.**

**5. Accepting gifts or benefits that are implicitly or explicitly linked to a quid pro quo is prohibited.**

**6. Accepting, giving, or offering bribes and/or commissions is unacceptable under any circumstances.**

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**7. Employees are prohibited from accepting money, travel expenses, event expenses, or similar payments from subcontractors, suppliers, consultants, competitors, or customers without compensation or on loan.**

**8. The types of gifts and promotional materials that may be given by the Company to customers, dealers, and other third parties with whom it has business relationships are determined with the approval of the Deputy General Managers. No additional permission is required for the distribution of approved gifts and promotional materials.**

**9. Provided that they comply with the conditions listed in Article 2, the Company may accept appropriate products and services as gifts, and products or services that are appropriate to the recipient's culture and ethical values may be given as gifts with the knowledge and approval of the Deputy General Managers.**

**10. In exceptional cases where local cultural values require the exchange of gifts beyond the values established in Company policy, such gifts may only be accepted on behalf of the Company and with the approval of the Deputy General Managers. In any case, the exchange of gifts must be conducted in a manner consistent with local culture.**

#### **Confidential Information Protection Policy**

**Information is one of the most important assets that the Company will use to achieve its vision. In this regard, the effective use of information, its proper sharing, and ensuring the confidentiality, integrity, and accessibility of information during this process are the shared responsibility of all our companies and employees. It is important for the Company to obtain maximum benefit from the management systems and processes established for the management and confidentiality of information in our Company to be in harmony with each other. Details of the relevant applications are included in the Royal Stone Houses Information Security Policy and related documents. The following application principles define confidential information for the Company and regulate the principles that employees must comply with regarding confidential information.**

#### **Application Principles**

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**Confidential Information includes, but is not limited to, the Company's trademarks and other intellectual property rights, any innovations, including databases, printed communication materials, processes, advertisements, product packaging and labels, and plans (marketing, product, technical) created, discovered, developed, produced, or implemented by employees, business strategies, strategic partnerships and information related to partners, financial information, personnel information, customer lists, product designs, know-how, specifications, the identity of potential and actual customers, information related to suppliers, etc., in any form, including written, graphic, or machine-readable information.**

**The principles that must be followed regarding confidential information are listed below:**

- 1. This information cannot be disclosed to third parties unless its disclosure is required by Official Authorities and Legislation.**
- 2. This information cannot be altered, copied, or destroyed. Necessary measures are taken to ensure that the information is carefully maintained, stored, and not disclosed. Any changes made to the information are recorded along with their history.**
- 3. Confidential files cannot be taken outside the institution. For confidential information that must be taken outside the institution, approval must be obtained from the person responsible for the information or senior management.**
- 4. Passwords, user codes, and similar identifying information used to access company information are kept confidential and are not disclosed to anyone other than authorized users.**
- 5. Company confidential information is not discussed in dining rooms, cafeterias, elevators, service vehicles, and similar public places.**
- 6. Confidential information is classified according to its confidentiality level, which is clearly stated in the content of the information. Employees are aware of the confidentiality levels of the information they obtain in the course of their duties and act in accordance with this confidentiality. In case of any doubt regarding the confidentiality level, the higher**

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confidentiality level is applied, and the opinion of the relevant manager is sought when necessary.

**7. If information needs to be shared with third parties and/or organizations for the benefit of the Company, a confidentiality agreement is first signed or a written confidentiality commitment is obtained from the other party to ensure that these parties understand their responsibilities regarding the security and protection of the shared information.**

**8. False statements and/or rumors about individuals or organizations cannot be made.**

**9. Information regarding salaries, benefits, and other personnel matters that reflects Company policy and is specific to individuals is confidential and may not be disclosed to anyone other than authorized personnel. Information regarding employees is sent to them individually. Employees are strictly prohibited from disclosing this information to others or pressuring other employees to disclose it.**

#### **Policy on Creating and Maintaining a Fair Working Environment**

The Company considers creating and maintaining a fair working environment for its employees to be one of its top priorities. The aim is to create a working environment that is compliant with all relevant laws and regulations, fair, respectful of employees, healthy, and safe, thereby increasing employee success, development, and loyalty. The following implementation principles establish the fundamental principles for creating and maintaining a fair working environment at the Company.

#### **Implementation Principles**

**1. Company practices are in compliance with all applicable laws and regulations related to employment and working life. Company employees also comply with all legal requirements within the scope of their activities and act in accordance with legal regulations.**

**2. Royal Stone Houses' human resources policies and practices ensure that all other practices, including hiring, promotion, transfer, rotation, compensation, rewards, social rights, etc., are fair.**

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**3. Discrimination among employees based on language, race, color, gender, political opinion, belief, religion, sect, age, physical disability, or similar reasons is unacceptable within the organization.**

**4. A cooperative, positive, and harmonious work environment is created within the company, and conflict situations are prevented to ensure that people with different beliefs, thoughts, and opinions can work together harmoniously.**

**5. Respect for employees' private lives and personal space.**

- **Communications between individuals may not be violated by third parties.**

- **Even if recorded in accordance with the law, the unlawful disclosure/dissemination/interception of personal data to others is prohibited.**

- **Personnel information that is necessary for the nature of the employment relationship and its continuation shall not be used for purposes other than those intended and shall not be shared with third parties without the consent of the individuals concerned.**

- **The private and family lives of all employees are respected.**

**6. In addition to all forms of inviolability, the physical, sexual, and emotional inviolability of employees is also protected.**

- **Any violation of employees' physical, sexual, and/or emotional inviolability through physical, sexual, and/or emotional harassment at the workplace or any other location related to work is contrary to the law and ethical rules, and the Company does not tolerate such violations in any way. The purpose of this policy is to ensure that employees work in a workplace where their physical, sexual, and emotional inviolability is protected.**

- **The violation of a person's physical integrity through sexual behavior and/or the harassment of a person for sexual purposes without physical contact is defined as sexual harassment. Accordingly, any behavior that could be considered within this definition is prohibited.**

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- Additionally, no tolerance is shown toward those who exhibit negative attitudes or behaviors toward individuals who report or assist in investigations of harassment.

**7. No employee may request preferential treatment based on gender, religion, language, or race, nor may anyone be given preferential treatment or be subject to special treatment. It is unacceptable to grant or receive concessions based on differences such as gender, religion, language, or race.**

**8. The physical working environment and conditions at the workplace shall be healthy and safe for all employees.**

### **Anti-Bribery and Anti-Corruption Policy**

**For Royal Stone Houses;**

**Corruption is the misuse of authority, whether directly or indirectly, for the purpose of obtaining any kind of gain due to one's position.**

**Bribery is the direct or indirect provision, offer, or promise of benefits, or the request or acceptance thereof, through intermediaries or otherwise, to induce a person to perform, cause to be performed, refrain from performing, expedite, or delay an act related to the performance of their duties, thereby acting contrary to the requirements of their position. or delaying a task related to the performance of their duties, either directly or through intermediaries, by offering, promising, or accepting benefits; requesting or accepting such benefits; or acting as an intermediary in such transactions, thereby acting contrary to the requirements of their position. Bribery and corruption can take many different forms. These include:**

- Cash payments,
- Political or other donations,
- Commissions,
- Social benefits,
- Gifts, hospitality,

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• **Other benefits.**

Facilitation payments, on the other hand, are informal, inappropriate, small payments made to a lower-level official to ensure or expedite the completion of a routine or necessary procedure that the paying party is legally entitled to. Such irregular payments are tracked through reports made to Royal Stone Houses.

Individuals and organizations covered by this Policy shall not offer facilitation payments to government agencies to secure or expedite a routine procedure or process (obtaining permits and licenses, obtaining documents, etc.).

In line with our commitment to transparency and accountability, we take all necessary measures to prevent any form of bribery, corruption, or facilitation payments.

If any Royal Stone Houses employee or stakeholder witnesses any action or practice related to bribery and corruption, reports this situation to the HR department, or if the relevant situation is detected ex officio by the authorized units;

A Disciplinary Committee is convened for Royal Stone Houses employees, and if it is determined that the employee attempted or committed an act of bribery or corruption, the necessary sanctions are immediately applied, taking into account the principle of proportionality, after the employee's written defense is received or the period granted for the employee to submit a written defense has expired. Sanctions such as warnings, reprimands, or salary deductions may be imposed, and the employment contract may be terminated in accordance with the principle that termination is a last resort.

In the event that any attempt or act by a partner, customer, supplier, and/or any party with a commercial or sectoral connection to Royal Stone Houses that may be related to bribery and/or corruption is detected, the necessary notifications shall be made to the legal authorities without delay.

**APPLICABLE LAWS**

Due to the fact that the Company operates in international markets, its operations may be subject to the laws and regulations of different

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countries. When there are questions regarding business ethics in different countries, the regulations established in the country where the business is conducted should be followed first. If following the regulations of the country or countries where the business is conducted could lead to undesirable results in terms of the ethical values adopted by the Company, we should seek solutions within the framework of our ethical rules and procedures.

## **EMPLOYEES' RESPONSIBILITIES**

Royal Stone Houses Boutique Hotel's Ethics and related policies and procedures detail the ethical rules governing how we should behave and conduct our business. Compliance with these rules is the primary responsibility of all employees. In this regard, Company employees must:

- Act in accordance with laws and regulations under all circumstances,
- Read the Royal Stone Houses Boutique Hotel - Ethical Rules, understand, internalize, and act in accordance with the rules, principles, and values contained therein,
- Learn the general and specific policies and procedures applicable to the Company and its operations,
- Consult with their manager and human resources regarding potential violations involving themselves or others,
- Promptly reporting potential violations by oneself or others; communicating such reports to one's manager and human resources in writing or verbally, either anonymously or by name,
- Following the “Procedures and Methods to Be Followed When Making Ethical Decisions” defined to assist in acting in accordance with the rules and resolving issues,
  - Cooperating with the Company Ethics Committee Advisor in ethical investigations and maintaining confidentiality regarding investigation-related information.

### **A. Procedures and Methods to Follow When Making Ethical Decisions**

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**When deciding on a course of action, you should follow the steps below and ask yourself the following questions:**

**1. Identify the Incident, Decision, or Problem**

- Have you been asked to do something that you believe may be wrong?
- Are you aware of a situation in your company or among your business partners that may be potentially illegal or unethical?
- Are you trying to make a decision and have doubts about how to act in accordance with business ethics?

**2. Think Before Making a Decision**

- Try to clearly identify and summarize the problem or question
- Ask yourself why it is a dilemma
- Consider the options and their consequences
- Consider who might be affected
- Consult with others

**3. Decide on a Course of Action**

- Identify your responsibilities
- Review all relevant facts and information
- Refer to applicable company policies, procedures, and professional standards
- Assess the risks and consider how you can mitigate them.
- Try to develop the best action plan.
- Consult with others.

**4. Test Your Decision**

- Review the ethical questions that need to be asked.
- Review your decisions in light of the company's core values.

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- Make sure you have taken company policies, laws, and professional standards into account.

- Consult others and evaluate their opinions within the action plan you have developed.

#### **5. Proceed with Confidence**

- Share your decision with relevant parties along with your rationale

- Share what you have learned

- Share your success story with others

### **B. Four Key Questions to Consider**

#### **1. Is this activity/behavior in line with laws, rules, and traditions? (Standards)**

- Is it in line with professional standards?

- Is it in line with the law?

#### **2. Is this activity/behavior balanced and fair? Would we be upset if a competitor (someone else) did it? (Sense of justice)**

- Do you think it is right?

#### **3. Would our company and stakeholders be upset if all the details of this activity were made public? (Emotions and ethical values)**

- If others knew you had engaged in this behavior, would you be in a difficult situation or feel embarrassed? • Could it have negative consequences for you or your company?

- Who else could be affected by this (other employees within the company, you, shareholders, etc.)?

#### **4. To what extent does the “perceived truth” align with the “objective truth”?**

- How would it be reflected in the media or on social media?

- What would a reasonable person think under the same circumstances?

### **MANAGERS' RESPONSIBILITIES**

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**In addition to the responsibilities defined for employees, managers at Royal Stone Houses Boutique Hotel also have additional responsibilities within the framework of our Ethics Policy. Accordingly, managers are responsible for:**

- **Ensuring the creation and maintenance of a corporate culture and working environment that supports ethical rules,**
- **Setting an example through their behavior in applying ethical rules and training employees on ethical rules,**
- **Supporting employees in communicating questions, complaints, and reports related to ethical rules,**
- **Providing guidance on what needs to be done when consulted, taking all reports into consideration, and forwarding them to the Ethics Committee Advisor as soon as possible when deemed necessary,**
- **Ensuring that the business processes under their responsibility are structured to minimize ethical risks and implementing the necessary methods and approaches to ensure compliance with ethical rules.**

#### **OTHER RESPONSIBILITIES**

- **Company Senior Management; Royal Stone Houses Boutique Hotel - They are responsible for the effective implementation of the Ethical Rules and the creation of a culture that supports this.**
- **The Royal Stone Houses Boutique Hotel - Ethical Rules and all related policies are reviewed, revised, and documented by HR, approved by the Deputy General Managers, and communicated to the Companies.**
- **HR;**
  - **Ensures that employees are informed about the Code of Ethics, provides training at regular intervals to ensure that policies and rules are understood, and maintains constant communication with employees on this subject,**
  - **Ensures that new employees read the Code of Ethics, are informed about it, and sign the Employee Declaration,**

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- Ensuring that all white-collar employees print out the **Business Ethics Compliance Form** available electronically at the beginning of each year, sign it, and renew their declarations.
- **Company Management**, in collaboration with the **Ethics Committee Advisor**;
- Ensuring the confidentiality of complaints and reports made within the framework of ethical rules and protecting individuals after they make reports,
- Ensure the job security of employees who make reports,
- Ensure that complaints and reports are investigated in a timely, fair, consistent, and sensitive manner, and take decisive action in response to violations.

They are responsible for these tasks.

#### **RESOLUTION OF ETHICAL VIOLATIONS**

Those who violate the **Code of Business Ethics** or **Company policies** and procedures will be subject to various disciplinary measures, which may include termination of employment. Disciplinary measures will also be applied to individuals who approve, direct, or are aware of inappropriate behavior and actions that violate the rules and fail to report them appropriately.

#### **A. Ethics Committee**

In the event of an ethical rule violation requiring investigation, the **Company's Ethics Committee Advisor** convenes a three-member **Ethics Committee** consisting of himself, the **IKEI Manager**, and the **Audit Manager**. The **Ethics Committee Advisor** chairs the **Committee**. The **Committee** meets with at least one member of the **Chair** and members. The **Committee** makes its decisions by unanimous vote.

If any member of the **Ethics Committee** is involved in an ethics rule investigation, that member may not attend meetings related to the investigation.

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**The Ethics Committee operates under the Board of Directors. However, when deemed necessary, it reports to the Royal Stone Houses Boutique Hotel Board of Directors.**

**The Ethics Committee is responsible for investigating and resolving complaints and reports of violations of ethical rules within the scope of Royal Stone Houses Boutique Hotel - Ethics.**

## **B. Ethics Committee Working Principles**

**The Ethics Committee conducts its work in accordance with the following principles:**

- **It keeps the identity of those who make reports or complaints confidential.**
- **It conducts investigations as confidentially as possible.**
- **It has the authority to request information, documents, and evidence related to the investigation directly from the relevant unit. It may only review any information and documents obtained in connection with the subject of the investigation.**
- **The investigation process is documented in writing from the outset. Information, evidence, and documents are attached to the record. • The record is signed by the chairperson and members.**
- **The investigation is handled expeditiously, and a conclusion is reached as quickly as possible.**
- **The decisions made by the Committee are implemented immediately.**
- **Relevant departments and authorities are informed of the outcome.**
- **The chairperson and members of the committee act independently and without influence from their department managers and the hierarchy within the organization when performing their duties in this matter. They cannot be pressured or persuaded regarding the matter.**
- **The committee may consult experts if it deems necessary and may utilize experts during the investigation by taking measures that do not violate confidentiality principles.**

**For questions and reports, you may use the email and postal addresses below or contact the Ethics Committee Advisor directly.**

## **Royal Stone Houses Boutique Hotel Ethics Committee**

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**Name and Surname İsa Okan**

**Email info@royalstonehouses.com**


**Phone +90 384 333 15 55**

**Postal Address Royal Stone Houses: Avcılar Neighborhood, Dutlu Street  
No:11 Göreme/Nevşehir 50180, Turkey**

**(Working hours: 08:00-16.00 , 16:00-24:00 , 24:00-08:00 , 20:00-04:00 ,  
13:00-21:00 , 04:00-12:00 , 12:00-20:00)**

**The Board of Directors commits to fulfilling the requirements outlined in this  
policy and expects Royal Stone Houses employees to do the same.**

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**Royal Stone Houses hotel is a boutique accommodation facility operating in the tourism sector. Our priority is to ensure food production and consumption that is compliant with food safety requirements and reliable.**

## **OBJECTIVE**

**Royal Stone Houses hotel aims to carry out activities that meet guest requests and ensure guest satisfaction in line with national and international food safety standards and legal requirements related to food production business unit processes.**

## **SCOPE**

**This policy covers**

- **The F&B unit that produces food and beverages and its auxiliary departments,**
- **All employees of the aforementioned departments,**
- **All employees listed in supplier and other third-party company contracts, as well as temporary Royal Stone Houses hotel staff.**

## **POLICY STATEMENT**

**As Royal Stone Houses Hotel, we are aware that achieving the expected goals in food safety practices requires determination, continuous improvement, and investment in resources. Accordingly;**

- **We undertake to comply with national and international food safety legislation obligations,**
- **As an accommodation facility, we will meet our guests' food safety requirements and ensure their continued satisfaction,**
- **We will invest in human resources, technology, and other necessary resources to ensure the continuity of food safety compliance,**
- **We will create and promote food safety awareness among all relevant departments and suppliers,**

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	<b>ROYAL BALON AND AVIATION OPERATIONS TOURISM TRADE INC. FOOD SAFETY POLICIES</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM008</b>
		<b>Revision Date: -</b>
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- To establish, monitor, and periodically review food safety objectives and targets,
- To implement HACCP, GMP, and other relevant process control management programs, we commit.

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. HUMAN RESOURCES POLICIES</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM009</b>
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**Royal Stone House 3-star Hotel invests in people. It believes that long-term relationships with all team members (company employees, contract staff, subcontractors, contractors, etc.), company culture, knowledge base, and core company values are fundamental to success.**

## **PURPOSE**

**The purpose of this policy is to establish the fundamental principles that will serve as the basis for all our human resources and industry-specific practices, including recruitment, performance, training, development, orientation, talent management, labor relations, payroll, time tracking, and other related areas.**

**By applying these principles, the aim is to achieve sustainable success in strategy and objectives, employee loyalty, low employee turnover, and a competitive advantage through organizational structure.**

**Royal Stone House expects all team members (company employees, contract staff, subcontractors, etc.) to think and act as partners of the company and to continuously demonstrate their ability to create economic value for shareholders and all other stakeholders.**

## **SCOPE**

**This policy is intended to be binding on all Royal Stone House employees, all job applicants, contractor employees, and all stakeholders and local communities with any commercial and/or sectoral ties to Royal Stone House. Within the scope of the above Purpose and Scope, the fundamental principles of our Human Resources Policy are as follows. Royal Stone House and all stakeholders intended to be bound by this policy accept and commit to the following principles.**

- Under no circumstances will discrimination be made against employees or job applicants on the basis of race, color, belief, ethnic and national origin, religion, gender, marital status, age, physical disability, or similar reasons.**
- The organization's human resources systems and processes will be continuously reviewed and structured in line with needs.**
- Qualified workforce that will carry the company into the future is recruited to the organization, and during this process, actions are taken in accordance with**

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the principles of equal opportunity and fair treatment, and cultural diversity is also supported in this direction.

- At any stage of product production, individuals are not forced to work against their will, and children and young workers under the age of 18 are not hired or employed.
- Personal and professional development activities are organized to ensure the continuous development of employees' competencies, knowledge, and skills related to their positions and to enable them to realize their potential. Form No.
- An effective performance evaluation system is implemented in which managers regularly monitor employee performance in an open communication environment and take responsibility for development, in a manner that supports corporate and individual development goals.
- It is aimed to create a common company culture by developing practices and approaches that will increase corporate loyalty, in a safe, healthy, participatory, and open to change working environment where employees can demonstrate their potential and where the Royal Stone House Hotel's Business Ethics Values are upheld.
- As Royal Stone House Hotel, our fundamental principles in managing the compensation policies for all our employees are transparency, fairness, and a policy that encourages sustainable success (rewarding and competitive) and is aligned with long-term goals.
- The Human Resources department holds weekly meetings with white-collar employees, especially new hires, to gather feedback on conditions at Royal Stone House Hotel, areas for improvement, and best practices. The managers of new hires provide feedback on career plans at least once a month. The relevant managers regularly report their opinions about the individuals to the General Manager.
- In accordance with legal regulations, the working hours of our white-collar and blue-collar employees at Royal Stone House are as follows:

**Day shift employees: They work a maximum of 45 hours per week over six days.**

**They take one day off per week as a weekly holiday.**

**Shift workers: They work a maximum of 45 hours per week. Employees working under this schedule take one day off after working six days.**

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Overtime work is conducted in accordance with the Labor Law No. 4857. The Labor Law No. 4857 stipulates that an employee may work a maximum of 11 hours per day. Therefore, an employee with a regular daily working hour of 7.5 hours may work a maximum of 3.5 hours of overtime per day.

As Royal Stone House, we adhere to the International Labor Standards regarding working hours—the ILO (International Labor Organization) Working Hours (Industry) Convention, 1919 (No. 1) and (Commercial and Office) Convention, 1930 (No. 30).

- Royal Stone House hotel employees can submit all requests related to their wishes and complaints via email. All requests are submitted to the Board of Directors for evaluation without being opened or preliminarily reviewed, along with the prepared follow-up record.

## **EMPLOYMENT POLICY**

### **PURPOSE**

The purpose of this policy is to define the principles governing the selection, placement, and retention processes for personnel to be hired for existing and/or newly opened positions within the organizational structure of the Royal Stone House hotel.

### **SCOPE**

This policy covers all personnel working within the Company and all job applicants. Within the scope of the above Purpose and Scope, the basic principles and guidelines for the Recruitment, Placement, and Retention processes are as follows:

- In line with the vision of Royal Stone House Hotel, we prioritize talent management in recruitment processes, creating an environment where candidates and employees can showcase their talents throughout the entire application evaluation, interview, placement, and retention processes.
- Based on interviews conducted during the recruitment process for white-collar candidates, positive/negative feedback is provided to support our candidates' self-talent management processes. This feedback explains to candidates the areas in which they can develop and in which they are competent.
- In order to reveal the emotional, cognitive, and technical skills of Royal Stone House white-collar employees, new employees are included in a 2-month

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**orientation program. During this process, employees have the opportunity to develop their technical skills by observing processes in the workplace and also develop their communication skills by meeting with unit managers.**

**Personal and professional development training supports employees' skill acquisition processes. In organizing training, each employee's strengths and weaknesses are identified, and within this framework, employees are provided with training in areas where they can develop themselves.**

**All these activities aim to ensure employee loyalty and encourage them to work at Royal Stone House for many years.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. OCCUPATIONAL HEALTH AND SAFETY POLICIES</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM010</b>
		<b>Revision Date: -</b>
		<b>Revision No:</b>

## **OBJECTIVE;**

As Royal Stone House employees, we aim to become a leader in occupational health and safety at the national and international level, based on sustainable development strategies in the sector in which we operate, such as hotels and other accommodation facilities, and to continuously improve and maximize our occupational health and safety performance.

## **SCOPE;**

This policy covers

- **Royal Stone House Hotel,**
- **All employees of Royal Stone House Hotel**
- **Personnel included in contracts with suppliers, contractors, subcontractors, and other organizations. The Board of Directors is committed to fulfilling the requirements set forth in this policy and expects its employees to fulfill the same commitments.**

**To achieve our goals;**

- **We will comply with relevant national and international requirements beyond the applicable occupational health and safety legislation, and continuously review and improve our occupational health and safety management.**
- **Identify all occupational health and safety risks and near-miss incidents that may arise from our activities and affect the health and motivation of our employees, and proactively conduct and update risk assessments on an ongoing basis to prevent workplace accidents and occupational diseases,**
- **Eliminating hazards and minimizing occupational health and safety risks, preparing for emergencies (e.g., fire, flood, earthquake, explosion, etc.), ensuring preparedness, maintaining, protecting, and enhancing workplace safety, increasing awareness, and providing the necessary resources in accordance with best practices to enable rapid response in emergencies, and supporting continuous improvement through training,**

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- **Demonstrating a ‘proactive approach’ by identifying hazards and risks in advance and taking the necessary measures in a timely and comprehensive manner,**
- **Delivering up-to-date theoretical and practical knowledge to all our operations through ‘Planned Training’ and enhancing competence,**
- **Planning, implementing, evaluating performance, and improving our Occupational Health and Safety Management System in line with sustainability principles, continuously**
- **We commit to ensuring the participation, communication, and consultation of employees, employee representatives, and all our stakeholders in improvement and development activities.**

**We promise.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. CORPORATE COMMUNICATION / COMPLAINT / SUGGESTION POLICY</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM011</b>
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## **PURPOSE**

In order to achieve our Sustainable Strategic Development Goals, the positive and negative thoughts, suggestions, and feedback of all our employees and stakeholders regarding our company are decisive factors in our roadmap. The purpose of this Policy is to respond to the needs of Royal Stone House hotel employees, all subcontractor employees within the facility boundaries, and all parties covered by this policy, and to manage requests, complaints, and suggestions that may arise due to facility activities in order to increase the effectiveness and reliability of the Royal Stone House hotel internal control system and to develop a sense of belonging. Inappropriate situations, behaviors, etc., that are contrary to the company's business ethics rules, policies, and applicable laws, that are irregular, and that have the potential to harm the company's sustainable institutional mechanisms, business relationships, operations, employees, subcontractor employees, and parties covered by this policy In such cases, Royal Stone House hotel employees, subcontractor employees, and individuals covered by this policy are permitted to report inappropriate situations without obtaining approval from upper management or supervisors. The hotel also manages requests, complaints, and suggestions that may arise due to facility operations, takes necessary measures, and evaluates suggestions.

However, since the evaluation of requests, complaints, and suggestions specified in this policy is subject to a specific process, matters requiring urgent intervention and assistance are excluded from the scope of this policy. For urgent matters, it is necessary to use the company's helplines, which can provide assistance with the shortest possible response time, and to contact the relevant emergency teams.

## **SCOPE**

This policy covers

- **Royal Stone House Hotel**
- **All employees of Royal Stone House Hotel**
- **Personnel included in contracts with suppliers, contractors, subcontractors, and other organizations**

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## **METHOD AND REQUIREMENTS**

- All employees, suppliers, contractors, temporary staff, and all parties covered by this policy within the facility are provided with the opportunity to submit their requests, complaints, and suggestions in writing to the suggestion, complaint, and suggestion boxes placed at designated locations and facility entrances that are easily accessible to everyone within the facility boundaries.
- All parties other than the hotel employees specified in this policy are encouraged to submit their requests, complaints, and suggestions as described below. They can submit their requests, complaints, and suggestions via email to [info@royalstonehouses.com](mailto:info@royalstonehouses.com) or contact us by calling the contact number on our website.
- Requests submitted via email are recorded in a log and forwarded to the Board of Directors. The Board of Directors reviews these requests in accordance with the objectives of this policy, filtering them through the ethical principles and sustainable corporate standards of Royal Stone House Hotel. Feedback is provided, and necessary actions are taken promptly regarding matters of importance.
- The identity of the complainant is kept confidential unless they wish otherwise, and the complainant is protected.

The Board of Directors is committed to fulfilling the requirements outlined in this policy and expects Royal Stone House hotel employees to do the same.

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. SOCIAL RESPONSIBILITY POLICY</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM012</b>
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**Child labor:** Not employing workers under the age of 18 in order to ensure the healthy development of children and respect for their right to education, and acting in accordance with the procedures and principles for employing young workers.

**Hiring:** To ensure the continuity of the company's ethical criteria, the selection of personnel in the hiring process will be based not only on technical and professional knowledge but also on compliance with company rules and social suitability requirements, which are considered necessary and important criteria. The policies to prevent discrimination and harassment/abuse, as outlined below, will be in effect from the hiring stage onwards.

**Employee Awareness:** Believing that social compliance is based on employee awareness, employees will be informed about their personal rights, company rules, and working conditions during the recruitment phase and at certain intervals during their employment in order to raise their level of awareness.

**Working Hours:** In order to ensure productive work and respect for human rights, working hours and overtime shall comply with applicable laws and regulations.

**Wages and Payments:** We base our minimum wage on the minimum wage that covers employees' living expenses; we do not pay wages below the minimum wage, and we pay overtime wages with the additions stipulated by law.

**Compliance with Laws and Other Obligations:** We comply with applicable laws and regulations, as well as the rules of our customers' business partnership guidelines and international social responsibility organizations (ILO).

**Discrimination:** Based on the principle that all employees have equal rights, there shall be no discrimination or dismissal or retirement based on race, social class, religion, national origin, gender, or political affiliation in matters of hiring, compensation, access to education, or promotion.

**Freedom of Association and Collective Bargaining:** Respecting employees' right to join a union and negotiate collective agreements, and their right to be freely and democratically represented through employee representatives,

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. SOCIAL RESPONSIBILITY POLICY</b>	<b>Publication Date: 01.06.2023</b>
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**Communication:** Believing that success depends on healthy communication, maintaining constant contact between employees and managers, fostering good relations between employees and managers, and implementing practices to ensure the continuity of these relations,

**Communication of Requests and Complaints:** Establishing alternative methods for every employee to communicate their requests and complaints, evaluating them in a timely and effective manner and providing feedback to create an appropriate working environment, ensuring that no retaliation will be taken against employees who communicate their requests and complaints.

**Prevention of Harassment and Abuse:** To ensure a peaceful work environment and that employees can work happily by preventing verbal, physical, or psychological harassment or coercion,

**Bribery and Corruption:** Under no circumstances will bribery, corruption, and/or the offering, receiving, or suggesting of commissions be accepted, and all actions will be taken in accordance with the Royal Stone Houses Code of Business Ethics Regulations that have been established and published.

**Forced and Compulsory Labor:** Work cannot be contracted as compulsory or in exchange for debt, and work must be based on the principle of voluntariness.

**Supplier Management:** Believing that all suppliers have equal responsibility, we will evaluate the social compliance activities of supplier companies, follow up on the results with action plans, and control social compliance activities with management systems.

**Occupational Health and Safety:** Recognizing people as the most valuable asset in all activities, accepting the creation of a safer and healthier working environment and minimizing any possible losses as a priority goal, organizing training to ensure that all employees are aware of their individual responsibilities in this regard, providing the necessary equipment in terms of Occupational Health and Safety, complying with local laws, regulations, and Royal Stone Houses procedures, creating a communication environment where all employees can work in accordance with procedures and regulations, raising awareness about the work done in this regard, identifying risks related to occupational health and safety hazards that may arise from our institution's activities, and controlling these risks by reducing them to acceptable levels.

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**Training:** The educational level of employees determines the overall level of the company. With this in mind, we commit to organizing in-house or external training programs to enhance employees' awareness of occupational health and safety and support their professional and personal development, and to ensure the continuous development of the company through the development of employees through the training programs organized.

**We commit to this.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. WATER MANAGEMENT POLICY</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM013</b>
		<b>Revision Date: -</b>
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**Our facility treats municipal tap water as required and ensures that it is used in this manner. The quality parameters of the treated water are continuously measured and monitored to ensure that they remain within defined limits.**

**Projects are developed and implemented at our facilities to reduce water consumption. At the same time, the water consumption values of the facilities are regularly monitored on a monthly basis, and water leak checks are continuously performed, with prompt intervention ensured.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. SUPPLIER DIVERSITY POLICY</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM014</b>
		<b>Revision Date: -</b>
		<b>Revision No:</b>

## **PURPOSE AND SCOPE**

**Royal Stone Houses is committed to our core values of safety, integrity, sustainability, inclusion, loyalty, mutual respect and support. Our aim is to develop long-term and sustainable relationships with diverse suppliers who add value to our supply chain, are open to innovation and continuous improvements.**

**The primary objective of the Supplier Diversity Policy is to provide opportunities to diverse suppliers that meet and adhere to our procurement and contracting standards. In addition, we aim to support our suppliers in achieving their corporate diversity goals and to provide them with the tools and resources to do so.**

**This is politics,**

- Royal Stone Houses,**
- All employees of Royal Stone Houses**
- Includes personnel involved in contracts with suppliers, contractors, subcontractors and other organizations**

## **OUR PRINCIPLES**

**We advocate building and retaining a diverse portfolio of high quality suppliers. We support the following core principles:**

**Ensuring that business is conducted legally and honestly**

- Creating an environment of trust by reducing risks**
- Support policies and practices that promote justice and inclusion**
- Encourage various suppliers to obtain certification from a nationally or regionally recognized third-party body**
- Ensure that all employees are treated equally with respect and dignity**
- Ensure that terms of employment are freely agreed to and documented by employees**
- Ensure that all employees are of appropriate age and receive fair remuneration**

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- Ensuring that working hours are appropriate for all employees
- Ensuring the health and safety of employees in the workplace
- To embrace sustainability and reduce unwanted environmental impact
- To support the use of tools that minimize consumption of scarce resources, recognizing the importance of efficiency in their use.

**The Board of Directors commits to fulfilling the requirements outlined in this policy and expects its employees to do the same.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. SUPPLIER CODE OF CONDUCT POLICY</b>	<b>Publication Date: 29.11.2022</b>
		<b>Form No: SY-FRM015</b>
		<b>Revision Date: -</b>
		<b>Revision No:</b>

## **OBJECTIVE**

**At Royal Stone Houses - Göreme, we act in accordance with sustainable development goals that take into account both national and international standards in terms of people, the environment, and governance. We expect all our employees, stakeholders, and suppliers with whom we collaborate within the supply chain to adopt this approach and adhere to the supplier conduct rules we have established.**

**At the same time, we aim to support our suppliers in establishing and complying with their own corporate behavior rules and to provide them with all the necessary tools and resources in this regard.**

## **SCOPE**

**Our supplier code of conduct covers:**

- **Royal Stone Houses - Göreme Hotel,**
- **All our domestic and international suppliers, subcontractors, contractors, goods and service providers, and all our partners who collaborate with Royal Stone Houses - Göreme Hotel.**

## **OUR RULES**

**1- Acting in accordance with the procedures and principles of employing young workers, ensuring that individuals are not forced to work against their will, complying with national and international standards regarding the minimum working age, etc.**


**2- To comply with the matters specified in the Royal Stone Houses - Göreme Hotel Code of Business Ethics and Policy, such as honesty, confidentiality, protection of personal data, conflict of interest, etc., and the matters specified in other policies under this policy, as well as national legislation related to human rights and international standards adopted by Royal Stone Houses - Göreme Hotel**

**3- To comply with applicable environmental legislation and international standards adopted by Royal Stone Houses - Göreme Hotel, and to adopt an environmentally conscious approach in the reduction of environmental impacts such as waste reduction, pollution prevention, efficient use of natural resources, etc., in the supply of products and services and in operations, as well as in measurement and monitoring activities and other matters.**

	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. SUPPLIER CODE OF CONDUCT POLICY</b>	<b>Publication Date: 29.11.2022</b>
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**4- When carrying out activities such as product and service supply, etc., comply with the applicable Occupational Health and Safety legislation in matters such as taking precautions against occupational accidents and diseases, providing necessary training to employees, securing the necessary resources related to occupational health and safety, identifying risks, reducing them to an acceptable level, etc.**

**The Board of Directors commits to fulfilling the requirements outlined in this policy and expects its employees to do the same.**

	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. GREEN PURCHASING POLICY</b>	<b>Publication Date: 01.06.2023</b>
		<b>Form No: SY-FRM016</b>
		<b>Revision Date: -</b>
		<b>Revision No:</b>

## 1. OBJECTIVE

The purpose of this policy is to ensure that the Royal Stone Houses hotel purchases equipment, products and services with high energy efficiency and environmental sensitivity, which are expected to have a significant impact on energy performance and the environment. Implementation of this policy will result in reduced energy consumption and greenhouse gas emissions, increasing environmental and economic benefits.

Royal Stone Houses is committed to consider energy performance as a minimum in all procurement activities related to the hotel's significant energy use and to reduce greenhouse gas emissions by reducing energy use.


## 2. PRINCIPLES

In this context, our green purchasing principles are as follows:

- Minimize unnecessary purchasing
- Minimizing waste
- Minimizing toxicity
- Minimizing habitat destruction
- Minimizing soil degradation
- Minimize greenhouse gas emissions
- Maximizing energy efficiency
- Maximizing water efficiency
- Maximizing health and safety elements
- Ensure the purchase of Eco-Labeled/Eco-friendly products and services
- Planning trainings to raise awareness of sustainability opportunities in procurement processes
- Creating fair trade opportunities

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. GREEN PURCHASING POLICY</b>	<b>Publication Date: 01.06.2023</b>
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## **2. METHOD**

The Green Procurement Policy ensures that when Royal Stone Houses hotel is identified as a significant energy user, action is taken to assess the impact of procurement when purchasing equipment that may have a significant impact on energy performance. Purchasing energy efficient products and services that operate more efficiently than conventional ones can reduce Royal Stone Houses hotel energy costs. In addition to lowering energy costs, procurement of energy-efficient products can reduce maintenance costs, reduce greenhouse gas emissions and improve pollution prevention and resource conservation activities.

### **REQUIREMENTS**

#### **Scope:**

This policy covers all production and auxiliary facilities and production processes of Royal Stone Houses hotel, raw materials and energy consumption used in production, all offices and office equipment and materials, all employees and other stakeholders (suppliers, contractors, subcontractors and personnel involved in contracts with other organizations).

#### **Communication:**

When Royal Stone Houses supplies energy services, products and equipment that have or may have an impact on significant energy use, Royal Stone Houses will inform suppliers that the supply has been evaluated in part on the basis of energy performance.

#### **Evaluation :**

Energy use, consumption and efficiency will be assessed by the equipment owner or contract manager over its projected working life and this assessment may be based on information provided by the potential vendor or Royal Stone Houses hotel's own investigation. The results of the assessment will influence purchasing decisions.

#### **Agreements:**

Contract specifications, supplier service agreements and other similar documents will require the vendor to configure the equipment to be optimal for energy performance to the extent specified by the manufacturer. Vendor selection will give preference to potential vendors with ISO 14001, ISO 50001

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. GREEN PURCHASING POLICY</b>	<b>Publication Date: 01.06.2023</b>
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or equivalent certifications. The products must also meet user requirements in terms of quality, performance and durability. The vendor shall provide customer support with respect to power management features so that these features are properly activated and repaired should a failure occur.

**Application:**

**Royal Stone Houses hotel will provide training and awareness raising tools to all staff.**

**Royal Stone Houses hotel will actively encourage innovative improvement in suppliers' energy efficiency performance and evidence of this communication will be recorded.**

**Royal Stone Houses hotel will continuously improve its procurement policy and guidelines by regularly reviewing contracts and suppliers and benchmarking this strategy against others, monitoring performance indicators using procurement standards and environmental and energy performance.**

**The Board of Directors is committed to fulfilling the requirements set out in this policy and expects Royal Stone Houses' employees to fulfill the same commitments.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. KVKK EMPLOYEE INFORMATION NOTICE</b>	<b>Publication Date: 01.06.2023</b>
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**Your personal data is processed by Royal Balloon and Aviation Operations Tourism Inc. (hereinafter referred to as “the Company”) as the data controller in accordance with the Personal Data Protection Law No. 6698 (hereinafter referred to as “the Law”). Tic. A.Ş. (hereinafter referred to as the “Company”) as the data controller, in accordance with the Law No. 6698 on the Protection of Personal Data (hereinafter referred to as the “Law”), in order to inform employees about the procedures and principles regarding the processing of their personal data, the data controller or its authorized representative shall provide the following information to the relevant individuals during the collection of personal data:**

- **The identity of the data controller and, if applicable, its representative,**
- **The purpose for which the personal data will be processed,**
- **To whom and for what purpose the processed personal data may be transferred,**
- **The method and legal basis for collecting personal data,**
- **The other rights listed in Article 11.**

**Your personal data will be recorded, stored, retained, reorganized, shared with institutions authorized by law to request such personal data, and transferred, assigned, classified, and processed in other ways specified by the Law to third parties within or outside the country under the conditions stipulated by the Law. The Company attaches particular importance to the security of personal data and takes all necessary technical and administrative measures. During job applications to the Company, at the stage of signing the employment contract, and during the employment period, personal information is requested from our employees in order to provide them with better service, fulfill our legal obligations, improve communication with our employees, and understand their needs and interests.**

**Your personal data will be processed in accordance with the principles listed in Article 4 of the KVKK Law;**

- **In accordance with the law and rules of good faith,**
- **Accurately and, where necessary, up to date,**
- **For specific, clear, and legitimate purposes,**
- **In a manner that is relevant, limited, and proportionate to the purpose for which they are processed,**

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- For the period specified in the relevant legislation or necessary for the purpose for which they are processed.

According to the Law, any data that can be associated with a real person, stored electronically or in print, and listed under the heading “Your Processed Personal Data” below, is defined as “Personal Data.” Your personal data may be collected by our Company or by real or legal persons processing data on behalf of our Company for various legal reasons, through websites, e-mail, mobile communication, mobile applications, application and membership forms, various contracts, and by verbal, written, or electronic means, without limitation.

Personal data may be shared with relevant institutions and organizations when required by law and is processed in accordance with the law and the rules of good faith, accurately and, where necessary, in an up-to-date manner, for specific, clear, and legitimate purposes, and in accordance with the principles of relevance, limitation, and proportionality.

As a company, all personal data stored in the employee's personnel file or electronically is processed for the purposes of fulfilling our obligations to our employees, supporting recruitment research, proving work, determining working hours and the start and end times of daily working hours, monitoring absenteeism, auditing time records, recording salary and salary-related information, making necessary notifications to the Social Security Institution and other institutions, implementing occupational health and safety regulations, fulfilling obligations arising from laws, and determining working conditions.

Following the termination of the employment contract, personnel files will be retained for 15 years, with all necessary technical and administrative measures taken.

## **Your Processed Personal Data**

### **Identity Data:**

Name, surname, date of birth, nationality, place of birth, gender, marital status, nationality, Turkish ID card information (TCKN, serial number, wallet number, father's name, mother's name, place of birth, province, district, neighborhood, volume number, family sequence number, sequence number, household number, page number, registration number, place of issue, reason for issue, date of issue, previous surname), copy of identity card, passport (passport number), residence permit, driver's license, other documents containing identity information (lawyer's ID card, etc.)

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**Contact Data:**

Phone number, full address information, email address, internal company communication information (internal phone number, corporate email address)

**Financial Data:** Financial and salary details, pay slips, bonus entitlements, bonus amounts, file and debt information related to enforcement proceedings, bank account statement, IBAN number, minimum subsistence allowance information

**Special Category Personal Data:**

Criminal record/conviction status, disability status/definition/percentage, religious affiliation, health data, blood type, health reports, carrier report, temporary or permanent incapacity report, pre-employment health report, chest X-ray, hearing test, vision test, liver enzyme screening, hepatitis tests, employment and periodic examination forms signed by the workplace physician, drug test, pregnancy status, pregnancy report, health and maternity leave information, union, association/foundation memberships

**Education Data:**

Educational status, certificate and diploma information, foreign language skills, education and skills, resume, courses and seminars attended

**Visual and Audio Data:**

Photographs of the individual, audio recordings, camera recordings (such as birthday celebration videos)

**Employee Performance and Career Development Data:**

Education and skills, information on what training was received and when, signed participation form, monthly performance evaluation and target achievement status, activity information, probationary period evaluation form

**Family and Relatives Data:**

Marriage certificate, spouse and children's names, surnames, Turkish ID numbers, gender, date of birth, height, weight, job title, names, surnames, phone numbers, and addresses of relatives who can be contacted in case of emergency

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**Work Data:**

Personnel number, position title, department and unit, title, last date of employment, dates of employment, insurance registration/pension allocation number, social security number, flexible working hours status, travel status, monthly total working hours information, seniority compensation base date, additional days of seniority compensation

**Leave Data:**

Leave seniority base date, leave seniority additional days, leave group, departure/return date, number of days used, reason for leave, address/phone number during leave, information on leave of absence,

**Other:**

Military deferment, shoe size, clothing size, height, weight, vehicle license plate, vehicle mileage information, internship status, bus route, bus stop data, employee internet access logs, entry/exit logs, employee daily activity data, vehicle GPS tracking system records, personal protective equipment inventory data

**Human resources payroll and salary processes:**

Your personal data is used for the creation of your personnel file (all documents listed in the employment documents list), the execution of employment and termination processes, the calculation of wages, the fulfillment of legal obligations before institutions such as SGK, İŞKUR, the Police Department, and the Gendarmerie, the tracking of annual leave and sick leave, the execution of all human resources processes, monitoring legal processes such as lawsuits and enforcement proceedings, reporting workplace accidents, complying with occupational health and safety regulations, enforcing court decisions, and complying with other information storage, reporting, and notification obligations required by legislation, relevant regulatory agencies, and other authorities.

**PKS (Personnel Attendance Control System) for entry and exit tracking:**

The system works with facial recognition system registration. If the personnel facial recognition system does not perform facial recognition, the relevant personnel must write a report explaining the situation to the human resources department to ensure entry and exit tracking.

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Additionally, the backup of the facial recognition system is handled by the Information Technology Department. This system is used to ensure that entry and exit are managed from a single location and to identify who is inside the building during extraordinary emergencies such as fires.

To enable the implementation and tracking of the flexible time system and the balancing system, the Accounting Department maintains records showing the start and end times of work. Balancing and overtime calculations are based on shift start and end times, not on entry and exit times at the workplace.

(Wearing uniforms, shift preparation, meal, and rest periods are excluded from these calculations).

#### **Education and career planning:**

In order to identify career planning and education needs, personal information such as educational status, certifications held, and information about previous education is kept in your personnel file.

#### **Camera tracking system:**

Cameras are installed in various locations within the company (including employee dormitories). Cameras are used for the general safety of employees, prospective employees, and customers, and are monitored 24/7 via cameras to enable emergency response in the event of any accidents, etc., in terms of workplace, occupational health, and safety. Additional cameras may be used if necessary.

#### **Company phone and company line:**

If a company phone and company line are provided, a line delivery and phone delivery receipt will be issued. Upon termination of the employment contract, written messages may be viewed by us during the formatting process of the returned line and phone. In this context, written messages may be reviewed by us. Care should be taken not to use the company phone for personal, private, and confidential correspondence.

#### **Monitoring of the company mailbox, tracking of internet traffic, and retention of internet access logs during the term of the employment contract and upon its termination:**

Upon termination of the employment contract, the passwords of the electronic devices (computers, phones, etc.) used by the departing employee will be changed by the IT Department on the date the employment contract ends. To

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ensure that all parties involved in customer and business relationships are not adversely affected and that service delivery continues uninterrupted, the mailbox will remain active for two (2) months, and incoming emails will be monitored by the IT Department and the relevant department manager. Past emails, along with their attachments, may be opened for the purpose of conducting business.

Illegal copying, business operations, business research, unauthorized software installation and use, participation in online communities, chat rooms, and forums for entertainment purposes, bulk emailing, accessing music sites, identifying sites that may contain viruses, accessing sites with inappropriate content contrary to general morality, customs, and traditions, harassment, gambling, betting, etc. will be monitored by the Information Technology Department at all times, and necessary restrictions may be imposed at any time. Logs of websites accessed in accordance with company rules and relevant laws are kept by the Information Technology Department. To prevent server capacity from being exceeded due to unnecessary emails and to avoid virus threats, Company management may restrict access to websites deemed inappropriate.

In this context, personal, private, and confidential correspondence and documents should not be sent from Company computers.

#### **Birthdays, weddings, childbirth, etc.:**

In order to be there for our employees on happy occasions such as birthdays, weddings, childbirth, etc., as well as on sad occasions such as accidents and funerals, announcements are made within the Company by mail or on staff notice boards on the relevant days and occasions.

#### **Blood type sharing:**


In the event that our employees or their relatives require blood, the employee's name, surname, phone number, and blood type information are communicated to all Company employees via mail, text message, or Company bulletin boards to ensure that the blood is obtained quickly.

#### **Reference checks upon hiring and termination:**

During your job application and probationary period, the Company may communicate with the references you provided to obtain information about your professional ethics. This will be valid for a period of two (2) months. Similarly, upon the termination of your employment contract, if you apply for a new job

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and our Company is contacted for reference checks, we will exchange information with the person/persons requesting references about our former employees. If you do not consent to reference checks, you must inform us at the time of your departure.

**Use of employee images and audio recordings for hotel promotion:**

We use internal and external communication channels to promote our hotel and services. We promote our services for conferences, weddings, meetings, and other events. Video and photo recordings of these services are made. These visuals are used on our company's social media accounts and in training sessions. For the sole purpose of promoting our services, it may be necessary to use the voice or image of relevant staff members in these promotions.

**Vehicle Tracking System:**

Company vehicles are procured either through service purchase or ownership. Vehicle entry and exit information, vehicle license plate, vehicle mileage, and driver information are recorded, tracked, and reported at the security gate and personnel gate. The purpose here is not to obtain information related to employees' private lives, but rather to ensure vehicle safety by enabling emergency response in case of breakdowns, fuel tracking, and other such situations.

**Employee of the Month, raffles, and other such events:**

Our company selects the "Employee of the Month" from various departments, and the selected employees are announced on employee bulletin boards with their first and last names, department, and a photo of the actual person. Additionally, in events such as proposals, suggestions, and competitions, the first and last names, department, and a photo of the actual person of the winners may be announced.

**Sharing your personal data with third parties within the country:**

For the purposes of your security and the Company's compliance with its legal obligations, your personal data may be shared with third parties within the country in accordance with the provisions of the Labor Law, the Occupational Health and Safety Law, the Social Insurance and General Health Insurance Law, the Law on the Regulation of Publications Made in the Internet Environment and

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the Fight Against Crimes Committed Through Such Publications, the Turkish Commercial Code, the Personal Data Protection Law No. 6698, the Identity Reporting Law, and other relevant legislation, your personal data may be shared with relevant institutions or organizations, the Personal Data Protection Authority, the Ministry of Finance, the Ministry of Customs and Trade, the Ministry of Labor and Social Security, the Turkish Employment Agency (İş-Kur), and the Information and Communication Technologies Authority. For example, employees' personal data is shared with the Social Security Institution for the purpose of paying employee and employer contributions.

**Sharing your personal data with our business partners:**

We use the ETA Accounting Program Payroll Module and the “Personnel Monthly Payroll Schedule” to carry out human resources processes. In case of any need for support, the relevant company's support staff can connect to the programs on-site or remotely and intervene. In this context, your personal information in the payroll program may inevitably be viewed by the relevant support staff. We have a confidentiality agreement with the aforementioned company regarding the protection of your personal data.

**Sharing of personal and special category personal data in accordance with Occupational**

**Health and Safety Legislation:**

Your personal and special category personal data may be shared with our workplace physician during the hiring process and for periodic health checks.

**Sharing with company lawyers:**

If necessary following the continuation or termination of the employment contract, in cases such as lawsuits, etc., your personal data may be shared with our company lawyers, provided that it is limited to the purpose of the relevant lawsuit.

**Sharing of your personal data within the scope of information technology (IT) support and archiving:**

We do not use third-party companies for backup services. If, when necessary, backup and support services are obtained from third-party companies for information technology purposes, personal data stored electronically may be

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viewed by backup and support teams; however, confidentiality agreements will be made with the relevant companies.

**Sharing within the scope of information technology (IT) support services:**

From time to time, computer malfunctions may occur, and our Information Technology Department may need to intervene. It should be noted that personal files or Outlook communications may be viewed during such interventions. Therefore, we kindly request that you refrain from conducting personal, private, or confidential communications on company computers and avoid storing such files.

Additionally, in order to ensure that work can be carried out without interruption, we would like to note that our IT Department always performs backups in case of data loss, enabling the recovery of lost data.

**Sharing of personal data in organizations such as travel, training, meeting participation, etc.:**

During business trips organized by us, as well as in all business-related events such as training sessions and company meetings, your personal data may be shared with third parties to the extent necessary to achieve the purpose of the event. Example: Sharing information such as name, surname, phone number, and postal address with the printer during business card printing. Sharing information such as your Turkish ID number, name, surname, and phone number with the agency for domestic or international business travel booking services.

**Sharing your personal data with department managers:**

During and after the hiring process, your personnel file is shared with department managers solely for the purpose of getting to know the employee and obtaining information about their performance. After the process is completed, your personnel file is retrieved and stored in lockers.

**According to Article 11 of the Law, you have the following rights:**

1. To learn whether your personal data has been processed,
2. To request information about the processing of your personal data,
3. To learn the purpose of your personal data and whether it is being used for its intended purpose,
4. To know the third parties to whom your personal data has been transferred within or outside the country,

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**5. To request the correction of your personal data if it has been processed incorrectly or incompletely,**

**6. To request the deletion or destruction of your personal data, (Please request a form from the Accounting Department for your request.)**

**7. Requesting that the third parties to whom personal data has been transferred be notified of the actions taken in accordance with clauses (d) and (e)**

**8. Objecting to the analysis of processed data solely through automated systems resulting in a decision adverse to the individual,**

**9. Requesting compensation for any damage incurred as a result of the processing of personal data in violation of the Law,**

**Your requests in your application will be resolved free of charge within a maximum of thirty days, depending on the nature of the request. However, if the process entails additional costs for the Company, a fee may be charged in accordance with the tariff specified in the Communication on the Procedures and Principles for Applications to the Data Controller by the Personal Data Protection Board.**

**You must submit your application regarding the processing of your personal data to the Company by filling out the application form available on the Company's website, in writing, or by using your registered electronic mail (KEP) address, secure electronic signature, mobile signature, or the electronic mail address you previously provided to us and which is recorded in our records. Depending on the nature of your request and the method of application, the Company may request additional verifications (such as sending a message to your registered phone number or calling you) to determine whether the application belongs to you and thus protect your rights. For example, if you submit your request using the email address registered with the Company, we may contact you using another communication method registered with the Company and request confirmation that the request belongs to you.**

#### **CONTACT:**

**Royal Balloon and Aviation Enterprises Tourism Trade Inc.**

**Avcilar Neighborhood, Dutlu Street, No: 9, Göreme – Nevşehir / TURKEY**

**TEL: +90 (384) 333 15 55**

**[info@royalstonehouses.com](mailto:info@royalstonehouses.com)**

**İsa Okan**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. PERSONAL DATA STORAGE AND DESTRUCTION POLICY</b>	<b>Publication Date:01.06.2023</b>
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## **CHAPTER 1: NATURE AND PURPOSE OF THE EXTERMINATION POLICY**

### **1.1. INTRODUCTION**

This destruction policy is hereby adopted by Royal Balon ve Havacılık İşletmeleri Tur. Tic. A.Ş. briefly ("Company") has been prepared in order to determine the procedures and principles to be applied by the Company regarding the deletion, destruction or anonymization of personal data in accordance with the Personal Data Protection Law No. 6698 and other legislation.

In this context, the personal data of our employees, employee candidates, guests, visitors and suppliers, and all natural persons who have personal data with the Company for any reason, are managed in accordance with the laws within the framework of the Personal Data Processing and Protection Policy and this Personal Data Retention and Destruction Policy.

### **1.2. DEFINITIONS**

**Relevant person:** The natural person whose personal data is processed,

**Destruction:** Deletion, destruction or anonymization of personal data,

**Law:** Personal Data Protection Law No. 6698 published in the Official Gazette dated 07.04.2016 and numbered 29677,

**Regulation:** Regulation on Deletion, Destruction or Anonymization of Personal Data published in the Official Gazette dated 28.10.2017 and numbered 30224

**Board:** Personal Data Protection Board

**Recording medium:** Any medium containing personal data that is fully or partially automated or processed by non-automated means, provided that it is part of any data recording system,

**Personal Data Processing and Protection Policy:** The policy that can be accessed at [info@royalstonehouses.com](mailto:info@royalstonehouses.com), which determines the procedures and principles regarding the management of personal data held by the Company,

**Data recording system (Sispar):** Refers to the recording system where personal

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data is structured and processed according to certain criteria.

## **CHAPTER 2: ENVIRONMENTS AND SAFETY MEASURES**

### **2.1. MEDIA WHERE PERSONAL DATA ARE STORED**

Personal data stored by the Company are kept in a recording environment in accordance with the nature of the relevant data and our legal obligations.

The recording media used for the storage of personal data are generally listed below. However, some data may be kept in a different environment than the environments shown here due to their special qualities or our legal obligations. In any case, the Company acts in the capacity of data controller and processes and protects personal data in accordance with the Law, the Personal Data Processing and Protection Policy and this Personal Data Storage and Destruction Policy.

- a) Printed media:** Media where data is stored by printing it on paper.
- b) Local digital media:** Servers, fixed or portable disks, optical disks and other digital media within the Company.
- c) Cloud environments:** These are environments where the internet-based system encrypted with different methods can be used, although it is not located within the Company.

### **2.2. ENSURING THE SAFETY OF ENVIRONMENTS**

The Company takes all necessary technical and administrative measures in accordance with the nature of the relevant personal data and the environment in which it is kept in order to store personal data securely and to prevent unlawful processing and access.

These measures include, but are not limited to, the following administrative and technical measures to the extent appropriate to the nature of the personal data concerned and the environment in which it is kept.

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### **2.2.1. Technical Measures**

The Company takes the following technical measures in all environments where personal data is stored in accordance with the characteristics of the relevant data and the environment in which the data is stored:

Only up-to-date and secure systems in accordance with technological developments are used in the environments where personal data are kept.

Security systems are used for the environments where personal data are kept.

Security tests and researches are conducted to identify security vulnerabilities on information systems, and existing or potential risks identified as a result of the tests and researches are eliminated.

Access to the media where personal data is kept is restricted and only authorized persons are allowed to access this data limited to the purpose of processing personal data and all accesses are recorded.

The Company employs sufficient technical personnel to ensure the security of the environments where personal data are kept.

### **2.2.2. Administrative Measures**

The Company takes the following administrative measures in all environments where personal data is stored in accordance with the nature of the relevant data and the environment in which the data is stored:

Trainings are provided to all Company employees who have access to personal data to raise awareness and raise awareness on information security, personal data and privacy.

Legal and technical consultancy services are obtained in order to follow developments in the field of information security, privacy and protection of personal data and to take necessary actions.

In the event that personal data is transferred to third parties due to technical or

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legal requirements, protocols are signed with the relevant third parties for the protection of personal data, and all necessary care is taken to ensure that the relevant third parties comply with their obligations in these protocols.

### **2.2.3. Internal and External Audit**

Pursuant to Article 12 of the Law, the Company conducts internal and external audits regarding the implementation of the provisions of the Law and the provisions of this Personal Data Storage and Destruction Policy and Personal Data Processing and Protection Policy.

If deficiencies or defects regarding the implementation of these provisions are detected as a result of internal and external audits, these deficiencies or defects shall be corrected immediately.

In the event that it is understood that the personal data under the responsibility of the Company is obtained by others illegally during the audit or in any other way, the Company shall notify the relevant person and the Board as soon as possible.

## **SECTION 3: DESTRUCTION OF PERSONAL DATA**

### **3.1. REASONS FOR STORAGE AND DISPOSAL**

#### **3.1.1. Reasons for Retention**

Personal data kept within the Company are stored for the purposes and reasons specified herein in accordance with the Law and our Personal Data Policy (you can access the relevant policy at "info@royalstonehouses.com ").

#### **3.1.2. Reasons for Destruction**

Personal data within the Company shall be deleted, destroyed or anonymized ex officio in accordance with this destruction policy upon the request of the person concerned or in the event that the reasons listed in Articles 5 and 6 of the Law disappear.

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**The reasons listed in Articles 5 and 6 of the Law are the following:**

**Explicitly stipulated in the law.**

**It is mandatory for the protection of the life or physical integrity of the person who is unable to disclose his/her consent due to actual impossibility or whose consent is not legally valid.**

**Provided that it is directly related to the conclusion or performance of a contract, it is necessary to process personal data of the parties to the contract.**

**It is mandatory for the data controller to fulfill its legal obligation.**

**It has been made public by the person concerned.**

**Data processing is mandatory for the establishment, exercise or protection of a right.**

**Data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject.**

### **3.2. DESTRUCTION METHODS**

**The Company deletes, destroys or anonymizes the personal data that it stores in accordance with the Law and other legislation and the Policy on Processing and Protection of Personal Data, upon the request of the data subject or ex officio within the periods specified in this Personal Data Retention and Destruction Policy, if the reasons requiring the processing of the data disappear.**

**The most commonly used deletion, destruction and anonymization techniques used by the Company are listed below.**

#### **3.2.1.1.1 Deletion Methods**

##### **Deletion Methods for Personal Data Stored in Printed Media**

**Blackout Personal data in printed media are erased using the blackout method.**

**The blackout process is performed by cutting out the personal data on the relevant**

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document, where possible, and making it invisible by using fixed ink in a way that cannot be reversed and cannot be read with technological solutions.

#### **Deletion Methods for Personal Data Stored in Cloud and Local Digital Environment**

**Secure erasure from software:** Personal data stored in the cloud or on local digital media is deleted by digital command so that it cannot be recovered. Data deleted in this way cannot be accessed again.

### **3.2.1.2 Destruction Methods**

#### **Destruction Methods for Personal Data Stored in Printed Media**

**Physical destruction:** Documents kept in printed form are destroyed by document shredders in such a way that they cannot be reassembled.

#### **Destruction Methods for Personal Data Stored in Local Digital Media**

**Physical destruction:** The process of physically destroying optical and magnetic media containing personal data, such as melting, burning or pulverizing them. The data is rendered inaccessible by melting, burning, pulverizing or passing the optical or magnetic media through a metal grinder.

**Overwriting:** Random data consisting of 0s and 1s are written at least seven times on magnetic media and rewritable optical media, preventing old data from being read and recovered.

### **3.2.1.3. Anonymization Methods**

**Anonymization** is the process of making personal data impossible to associate with an identified or identifiable natural person under any circumstances, even by matching it with other data.

**Removing variables:** The removal of one or more of the direct identifiers contained in the personal data of the data subject that can be used to identify the data subject in any way.

This method can be used to anonymize personal data, as well as to delete personal

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data if there is information in the personal data that is not suitable for the purpose of data processing.

**Regional suppression:** It is the process of deleting information that may be distinctive for the data that is in an exceptional situation within the data table where personal data are collectively anonymized.

**Generalization:** The process of combining personal data belonging to many people and turning them into statistical data by removing their distinctive information.

**Data mixing and corruption:** Direct or indirect identifiers in personal data are mixed or distorted with other values so that their relationship with the data subject is severed and they lose their identifying characteristics.

### **3.3. STORAGE AND DISPOSAL PERIODS**

#### **3.3.1. Storage Periods**

##### **Employee**

Employee, recruitment documents and personal data based on the notifications made to the Social Security Institution regarding the duration of service and wages shall be kept for **20 (twenty) years** during the continuation and termination of the service contract.

Employee, recruitment documents and personal data other than the personal data based on the notifications made to the Social Security Institution regarding the duration of service and wages shall be kept for **10 (ten) years** from the beginning of the calendar year following the continuation and termination of the service contract.

The Data in the Employee, Workplace Personal Health File shall be kept for **15 (fifteen) years** from the continuation and termination of the service contract.

##### **Business Partner**

Identity information, contact information, financial information, voice recordings

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of phone calls, Business Partner/Solution Partner/Consultant employee data regarding the execution of the commercial relationship between the Business

#### **Partner and the Company**

The Business Partner shall be kept for 10 years during and after the termination of the business/commercial relationship with the Company in accordance with Article 146 of the Turkish Code of Obligations and Article 82 of the Turkish Commercial Code.

#### **Visitor**

The name, surname, T.R.K.N., vehicle license plate number and camera recordings of the Visitor taken at the entrance to the physical space of the Company, and voice recordings taken during phone calls are kept for 2 years.

#### **Website Visitor**

The name, surname, e-mail address, browsing movements information of the Website Visitor is stored for 2 years.

#### **Employee Candidate**

The information contained in the CV and job application form of the Employee Candidate is kept for a maximum of 2 years, for the period of time that the CV will lose its currency.

#### **Intern(student)**

The information contained in the internship file of the intern is kept for 10 (ten) years from the beginning of the calendar year following the continuation and completion of the internship relationship.

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### **Guest**

**Guest's name, surname, T.R.K.N., contact information, payment information and methods, location information, voice recordings of phone calls, service preferences, transaction history, special day information,**

**Each service purchased by the guest is retained for a period of 10 years from the date of delivery in accordance with Article 146 of the Turkish Code of Obligations and Article 82 of the Turkish Commercial Code.**

**Guest Camera footage is stored for 30 days and vehicle license plate information is stored for 10 years.**

### **Institutions/Companies in Cooperation with the Company (Supplier)**

**Identity information, contact information, financial information, voice recordings received during phone calls, data on the execution of the commercial relationship between the Company and the Institutions/Companies with which the Company is in cooperation, data on the employees of the Institutions/Companies with which the Company is in cooperation**

**The information of the Institutions/Companies with which the Company is in cooperation shall be kept for 10 years during and after the termination of the business/commercial relationship with the Company in accordance with Article 146 of the Turkish Code of Obligations and Article 82 of the Turkish Commercial Code.**

### **3.3.2. Destruction Periods**

**The Company deletes, destroys or anonymizes personal data in the first periodic destruction process following the date on which the obligation to delete, destroy or anonymize the personal data for which it is responsible in accordance with the Law, relevant legislation, Personal Data Processing and Protection Policy and this Personal Data Storage and Destruction Policy arises.**

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**When the relevant person applies to the Company pursuant to Article 13 of the Law and requests the deletion or destruction of his personal data;**

**If all the conditions for processing personal data have disappeared; The Company deletes, destroys or anonymizes the personal data subject to the request within 30 (thirty) days from the day it receives the request, explaining the reason for it, with the appropriate destruction method. In order for the Company to be deemed to have received the request, the person concerned must have made the request in accordance with the Personal Data Processing and Protection Policy. In any case, the Company shall inform the relevant person about the transaction.**

**If all the conditions for processing personal data have not disappeared, this request may be rejected by the Company by explaining the reason in accordance with the third paragraph of Article 13 of the Law and the rejection response shall be notified to the data subject in writing or electronically within thirty days at the latest.**

### **3.4. PERIODIC DESTRUCTION**

**In the event that all of the conditions for processing personal data specified in the Law disappear; The Company deletes, destroys or anonymizes the personal data whose processing conditions have disappeared through a process specified in this Personal Data Storage and Destruction Policy and to be carried out ex officio at recurring intervals.**

**Periodic destruction processes start for the first time on 28.12.2018 and repeat every 6 (six) months.**

### **3.5. SUPERVISION OF THE LEGALITY OF DESTRUCTION**

**The Company performs ex officio destruction operations both upon request and in periodic destruction processes in accordance with the Law, other legislation, the Personal Data Processing and Protection Policy and this Personal Data Storage**

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**and Destruction Policy.**

**The Company takes a number of administrative and technical measures to ensure that destruction operations are carried out in accordance with these regulations.**

### **3.5.1. Technical Measures**

**The Company maintains technical tools and equipment suitable for each destruction method in this policy.**

**The Company ensures the security of the place where the destruction operations are carried out.**

**The Company keeps access records of the persons who carry out the destruction.**

**The Company employs competent and experienced staff to carry out the destruction process or receives services from competent third parties when necessary.**

### **3.5.2. Administrative Measures**

**The Company provides trainings to raise awareness and raise awareness of its employees who will carry out the destruction process on information security, personal data and privacy.**

**The Company receives legal and technical consultancy services to follow developments in the field of information security, privacy, protection of personal data and secure destruction techniques and to take necessary actions.**

**In cases where the Company outsources the destruction process to third parties due to technical or legal requirements, the Company signs protocols with the relevant third parties for the protection of personal data and takes all necessary care to ensure that the relevant third parties comply with their obligations in these protocols.**

**The Company regularly audits whether the destruction operations are carried out in accordance with the law and the conditions and obligations specified in this**

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**Personal Data Storage and Destruction Policy, and takes the necessary actions.**

**The Company records all transactions regarding the deletion, destruction and anonymization of personal data and keeps such records for at least three years, excluding other legal obligations.**

#### **SECTION 4: PERSONAL DATA COMMITTEE**

**Establishes a Personal Data Committee within the Company. The Personal Data Committee is authorized and tasked with carrying out / having carried out the necessary actions and supervising the processes for the storage and processing of the data of the relevant persons in accordance with the law, the Personal Data Processing and Protection Policy and the Personal Data Storage and Destruction Policy.**

**The Personal Data Committee consists of three people: a manager, an administrative expert and a technical expert. The job descriptions of the company employees assigned to the Personal Data Committee are as follows:**

##### **Job Description**

##### **Personal Data Committee Manager :**

**It is obliged to direct all kinds of planning, analysis, research, risk identification studies in the projects carried out in the process of compliance with the Law; to manage the processes to be carried out in accordance with the Law, Personal Data Processing and Protection Policy and Personal Data Storage and Destruction Policy and to resolve the requests received by the relevant persons.**

**KVKK Specialist (Technical and Administrative) : Responsible for examining the requests of the data subjects and reporting them to the Personal Data Committee Manager for evaluation; carrying out the transactions regarding the requests of the data subjects evaluated and decided by the Personal Data Committee Manager in**

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accordance with the decision of the Personal Data Committee Manager; auditing the storage and destruction processes and reporting these audits to the Personal Data Committee Manager; carrying out the storage and destruction processes.

## **SECTION 5: UPDATE AND HARMONIZATION**

The Company reserves the right to make changes to the Personal Data Processing and Protection Policy or this Personal Data Storage and Destruction Policy due to amendments to the Law, in accordance with the decisions of the Authority or in line with developments in the sector or in the field of informatics.

Changes made to this Personal Data Storage and Destruction Policy are immediately incorporated into the text and explanations regarding the changes are explained at the end of the policy.

### **5.1 AMENDMENT NOTES**

**28.12.2018 : Personal Data Retention and Destruction Policy has been published.**

**\*There are no earlier amendments.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. CHILD ABUSE POLICY</b>	<b>Publication Date: 01.06.2023</b>
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**At Royal Stone Houses, we have taken education as the basis for our efforts to prevent child abuse. We have included training on protecting children from all forms of abuse under the heading of mandatory training in all our facilities, and we have specifically addressed this issue in our compliance programs.**

**In this context;**

- **Royal Stone Houses hotel does not tolerate any harassment or discrimination,**
- **Fulfills its responsibilities for the protection of children and provides the necessary resources to demonstrate leadership in this regard,**
- **Ensuring that our facility managers are informed and the necessary sanctions are applied in accordance with our rules when any child abuse is observed, and informing law enforcement authorities when necessary,**
- **Implementing high-level security measures in services and activity programs for children, and creating social environments where parents can safely entrust their children,**
- **We are fully aware of the critical importance of child welfare and protecting children from all forms of harm. We commit to preventing all forms of abuse and exploitation,**

**And hereby declare this as our Policy on the Protection of Children and Prevention of Abuse.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. EDUCATION AND CAREER MANAGEMENT POLICY</b>	<b>Publication Date: 01.06.2023</b>
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### **Education and Career Management;**

**All of our employees have equal access to education, and we offer numerous training opportunities in many areas that we believe will contribute to our employees and develop their personal profiles and competencies, including legal and professional training required by the hospitality industry, as well as personal development, awareness, leadership training, foreign language training, understanding and helping people with disabilities, and many other topics. Our group, which prioritizes investing in its employees, particularly in the field of education, also places importance on promoting employees from within the facility or the group. No discrimination is made in internal promotions; every employee who meets the requirements of a higher position has the opportunity to be promoted. Employees who meet the requirements of the position in terms of knowledge, skills, education, and competencies, and whose performance exceeds the expected level, are promoted to a higher position.**

**In parallel with the protocol signed between the Ministry of National Education (MEB) and the Ministry of Culture and Tourism, our group has also signed a separate protocol with the MEB, etc.**

### **Project Objective:**

**To ensure that teachers are trained to meet the tourism sector's need for qualified human resources and to contribute to improving their professional competence. In this context, one school in our group has been designated as a project school under the protocol signed between our group and the Ministry of National Education.**

### **Scope:**

- **Providing on-the-job and in-service training for administrators and subject teachers in the sector**
- **Providing foreign language training**
- **Providing scholarships for university education to students who are successful during their internships in our group and are monitored, provided they enroll in a field related to the sector.**

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- **Providing additional payments to intern students in addition to normal internship wages.**
- **Providing schools with the necessary materials and equipment support.**
- **Providing skill training to interns and teachers within our group**
- **Providing employment guarantees to students we have identified as successful during their internships within our group.**

#### **Rewards and Support;**

**We know that providing our employees with opportunities for development is one of our most important responsibilities, and we believe that when our employees develop themselves, they will make a difference in their work and become more successful. Within the scope of this responsibility;**

- **Language allowance; Employees who demonstrate proficiency in foreign languages other than their native language in exams are paid additional allowances at rates determined according to their level.**
- **Education: We encourage employees who have interrupted their education for any reason to complete their education.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. CHEMICAL USE POLICY</b>	<b>Publication Date: 01.06.2023</b>
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- We work with relevant companies to safely dispose of chemicals and track chemical waste.
- We train our employees on the use of chemicals and the measures to be taken in the event of a spill or release of hazardous chemicals.
- We monitor our chemical usage quantities and provide staff training to prevent unnecessary and improper chemical usage.
- We take the necessary precautions for hazardous chemical waste, leaks, etc., and provide staff training on how to respond to spills, exposure, and other incidents.
- Steam cleaners are used for detailed cleaning of all common areas and guest rooms that do not require chemical cleaning.

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. WATER MANAGEMENT POLICY</b>	<b>Publication Date: 01.06.2023</b>
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**We are aware that we will need more clean water sources in the future to live a better life.**

**Here are the details of how we save energy from the energy sources we use:**

- **The water flow rate in all room and common area sink faucets is set to not exceed 5 liters per minute, and 10 liters per minute in showers. Monthly monitoring is conducted to measure the flow rate in one faucet and one shower in each block, and this practice is regularly followed up on, with the flow rate of faucets and showers with high flow rates being reduced.**
- **We have a wastewater plan from the relevant municipality showing that all wastewater sources are treated and discharged safely without affecting the local community or the environment. Our wastewater is connected to the sewer system in accordance with the discharge regulations.**
- **Our pool staff are trained in backwashing procedures.**
- **All reservoirs are set to release no more than 6 liters of water per use.**
- **Stickers in the general area restrooms request guests and staff to use water sparingly and report any water leaks.**
- **Urinals use systems that automatically release water.**
- **Our staff are regularly trained on water conservation and reporting potential water leaks.**
- **LED fixtures are used in all hotel sinks.**
- **Guest rooms are equipped with dual-flush toilet buttons.**
- **Automatic sprinkler and drip systems are used for garden irrigation to reduce water consumption. The garden irrigation plan contributes to preventing water loss by irrigating after daylight hours.**
- **Water consumption is continuously monitored and recorded. The data obtained from these monitoring activities is recorded on a daily, monthly, quarterly, and annual basis, and if our target is exceeded on a monthly basis, the cause is investigated.**
- **We use our water risk analyses to monitor the areas where the most water is consumed and the measures to be taken in this regard based on scores.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. COMMUNITY PERFORMANCE POLICY</b>	<b>Publication Date: 01.06.2023</b>
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- We hire local people and provide transportation for them.
- We select our product and service suppliers from local companies.
- We prefer to use local products.
- We provide meeting rooms for environmental organizations.
- Our hotels offer internships to university and high school students.
- We offer employment opportunities to disabled and foreign citizens.
- We make donations in the form of equipment support as a result of cooperation with local schools.
- In cooperation with local mayors, we provide employment opportunities to the local community and offer social opportunities to those in need.
- Special discounted meal arrangements or donations are made in collaboration with public institutions and NGOs in the region.
- We organize cultural trips for our employees to raise awareness and historical consciousness.
- We have agreements with local dental clinics, hospitals, kindergartens, stationery stores, and gyms to offer our employees special discounted prices.
- We introduce our guests to natural and historical sites in the area, local markets, public transportation schedules, and sustainability initiatives at our facility through our Sustainability Board, info channel, and mobile app.

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. HAZARDOUS WASTE POLICY</b>	<b>Publication Date: 01.06.2023</b>
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**In order to dispose of hazardous waste generated in our hotels without harming the environment, we established a Hazardous Waste Procedure in 2023. We collect hazardous waste generated in our departments in our hazardous waste rooms under appropriate conditions, label it, and deliver it to licensed companies for disposal or evaluation in accordance with the law. To reduce the amount of hazardous waste, our printer toners are collected by the supplier company on a deposit basis.**

**We have waste battery boxes at various points within the hotel to prevent harm to nature. In 2023, waste batteries were handed over to TAP (Portable Waste Battery Manufacturers and Importers Association Economic Enterprise).**

**In 2023, hazardous waste from our hotels was delivered to licensed companies.**

**Our procedure for collecting waste and delivering it to licensed companies for disposal involves training our staff to raise awareness on this issue.**

**In 2023, waste oil is regularly collected by recovery companies and used in biodiesel production.**

**We are working to increase the amount of vegetable waste oil recycled each year. We ensure that the ratio of recycled oil to total oil exceeds 45% each year and continues to increase.**

**Every year, “Recycling and Waste Separation” and “Chemical Use Training” courses are given. These courses are given by experts in the field.**

**Our goal for 2024 is to collect all hazardous waste generated in our hotel in an appropriate manner without mixing it with other waste in the hazardous waste storage area and to deliver it to licensed companies, as well as to carry out activities that will minimize the amount of hazardous waste.**

**We monitor our hazardous waste quantities. We take care to ensure that the materials we use do not contain hazardous substances as much as possible, and that those that do contain them are disposed of appropriately. We have identified the hazardous materials we use in general areas and increased our monitoring of them. We have determined our net hazardous waste amount for 2023 and plan to take more measurable actions to minimize it in 2023.**

**In the industrial cold storage rooms used within our hotel, R404A gas is used instead of CFC (chlorofluorocarbon) gases, which are harmful to the ozone layer.**

**Recyclable materials are separated at our hotel. We are proud to share our recycling figures.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. WORKS PROTECTION POLICY</b>	<b>Publication Date: 01.06.2023</b>
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## 1. Purpose

This protocol sets out our company's commitment to the protection of historical and archaeological artifacts and the procedures that must be followed in this regard. Our company is responsible for ensuring that historical and cultural artifacts are preserved and exhibited in accordance with national and international laws and ethical standards.

## 2. Scope

This protocol applies to all departments, employees, and business partners of our company. All historical and archaeological artifacts located within the hotel premises, on display, or made available to guests in any way will be evaluated within the framework of this protocol.

## 3. Basic Principles

Our company acts in accordance with applicable local, national, and international laws.

Historical and archaeological artifacts cannot be taken, sold, or displayed without the permission of the relevant official authorities.

Our company strictly prohibits activities such as smuggling or illegal trade and reports such cases to the relevant authorities.

Our employees receive regular training on the protection of historical and archaeological artifacts.

Our company contributes to the protection and promotion of regional cultural heritage.

Customers are informed about the historical and archaeological values of the region.

## 4. Application Principles

If any historical or archaeological artifacts need to be displayed within our business, the necessary permits must be obtained from the relevant authorities (Ministry of Culture and Tourism, General Directorate of Museums, etc.).

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**Our company does not engage in the sale or trade of historical and archaeological artifacts in local or international markets in any way.**

**Our employees are obliged to immediately inform management and the relevant authorities if they encounter any suspicious circumstances.**

**Guests are encouraged to be sensitive to the preservation of cultural heritage, and awareness is raised through informational materials.**

**Our company supports projects aimed at preserving historical artifacts by collaborating with museums, academic institutions, and cultural organizations.**

## **5. Monitoring and Enforcement**

**Compliance with the protocol will be monitored through regular audits.**

**If any violation of the protocol is detected within the company, disciplinary procedures will be applied to those responsible.**

**If any illegal activity is detected, it will be reported to the relevant legal authorities.**

## **6. Enforcement**

**This protocol shall enter into force on the date it is approved by the company management and shall be binding on all employees. In cases where updates are required, the necessary revisions shall be made with the approval of the competent authorities and management.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. ACCESS POLICY FOR EVERYONE</b>	<b>Publication date:01.06.2023</b>
		<b>Form No: SY-FRM026</b>
		<b>Revision Date: -</b>
		<b>Revision No:</b>

## 1. Purpose

**This protocol demonstrates our company's commitment to accessibility and aims to ensure that individuals with special needs have equal access to our services. Our company aims to provide an inclusive accommodation experience for everyone by complying with accessibility standards.**

## 2. Scope

**This protocol covers all areas of our business, employees, and guests. Our business is committed to making the necessary arrangements, taking into account the needs of individuals with physical, cognitive, or sensory disabilities.**

## 3. Basic Principles

**Our company complies with current national and international accessibility legislation and standards.**

**Accessibility arrangements are made to ensure that individuals with special needs can fully enjoy the hotel, accommodation, restaurant, common areas, and other facilities.**

**Our employees are regularly trained to provide support to individuals with special needs.**

**Our business develops alternative methods of providing information for guests with visual, hearing, or other disabilities.**

**Feedback mechanisms are established to better understand the accessibility needs of our guests.**

## 4. Implementation Principles

**Physical arrangements such as ramps, wide doors, elevators, accessible toilets, and suitable seating areas are provided within the hotel.**

**Services such as audio information systems, materials prepared in Braille, and staff who know sign language are provided for individuals with hearing or visual impairments.**

**Online reservation and information platforms are organized in accordance with**

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**accessibility standards.**

**Staff are trained in sensitivity and awareness to ensure that individuals with special needs have full access to our services.**

**Emergency procedures are organized with special needs guests in mind, and additional support is provided when necessary.**

#### **5. Monitoring and Enforcement**

**Compliance with the Protocol will be monitored through regular audits.**

**When accessibility deficiencies are identified, the relevant corrections will be made as soon as possible.**

**If our employees fail to fulfill their obligations regarding accessibility, the necessary disciplinary procedures will be implemented.**

#### **6. Enforcement**

**This protocol enters into force on the date it is approved by management and is binding on all employees. It will be updated as necessary to comply with new accessibility standards.**

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	<b>ROYAL BALLOON AND AVIATION OPERATIONS TOURISM TRADE INC. WILDLIFE POLICY</b>	<b>PublicationDate:01.06.2023</b>
		<b>Form No: SY-FRM027</b>
		<b>Revision Date: -</b>
		<b>Revision No:</b>

### 1. Purpose

This protocol sets out our company's commitment to the protection of wildlife and establishes the principles that must be followed for the protection of wildlife species. Our company is committed to preventing the illegal hunting, trade, and use of wildlife species.

### 2. Scope

This protocol covers all employees, business partners, suppliers, and guests of our company. No wildlife species may be hunted, collected, consumed, displayed, sold, or used in any commercial activity in the course of our company's operations.

### 3. Basic Principles

Our company operates in accordance with local, national, and international legal regulations (including CITES - Convention on International Trade in Endangered Species).

Hunting and trade activities are not supported except for regulations approved by the competent authorities that guarantee the sustainable use of wildlife species.

Suspicious cases of poaching, illegal trade, and wildlife exploitation are reported to the competent authorities.

No products or by-products of wildlife species are used, sold, or displayed within the business.

Our employees receive regular training on wildlife conservation and participate in awareness programs.

Our guests are informed about wildlife conservation awareness and encouraged to practice responsible tourism.


### 4. Implementation Principles

Our business implements policies aimed at protecting endangered species in accordance with CITES and other relevant regulations.

All materials used in the supply chain are selected and monitored to ensure they do not harm wildlife.

No products derived from prohibited or endangered species are used in our restaurants or food and beverage services.

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		<b>Form No: SY-FRM027</b>
		<b>Revision Date: -</b>
		<b>Revision No:</b>

**Any activity or event that could lead to the exploitation of wildlife cannot be organized within our company.**

**Company employees are required to participate in training programs aimed at protecting wildlife species.**

#### **5. Monitoring and Enforcement**

**Compliance with the protocol will be monitored regularly.**

**If any violation of the protocol is detected within the company, the necessary disciplinary procedures will be applied to those responsible.**

**If any illegal activity is detected, it will be reported to the relevant authorities.**

#### **6. Enforcement**

**This protocol shall enter into force on the date of its approval by the company management and shall be binding on all employees. It shall be updated as necessary to comply with new legal regulations and sustainability standards.**

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