

COMPLIANCE

# WHISTLEBLOWING POLICY



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## 1. GENERAL PRINCIPLES AND SCOPE

Egebant adopts the principle of applying the highest ethical and legal standards in all its operations. In order to ensure that the Company's whistleblowing mechanism is managed at the highest possible level and maintained accordingly, employees who believe that the Code of Business Ethics has been violated in the workplace are required to report the situation to the Ethics Line as soon as possible within a logical framework.

The whistleblowing mechanism may be used to report unethical behavior including, but not limited to, the following situations:

- Violations of the Code of Business Ethics and related Policies,
- Illegal actions and instructions leading to legal violations, mismanagement, abuse of professional position, threats to public safety and health, and failure to comply with legal obligations in the countries where Egebant operates,
- Other activities that may harm the Company's operations.

This Policy covers all individuals who submit ethical reports to Egebant, whether in writing or verbally, including reports made directly to Egebant.

## 2. PRINCIPLES

### a. Definition of the Reporting Person

A reporting person may be any individual who reports actions or allegations that are not in compliance with the Code of Business Ethics and related Policies.

### b. Protection of the Reporting Person

No tolerance will be shown toward harassment or victimization of individuals who raise concerns, and the identity of reporting persons will not be disclosed unless they give consent otherwise. In addition, Egebant will not attempt to identify the identity of anonymous reporters.

Allegations and concerns reported anonymously will be considered fairly and appropriately by the Compliance Officer in accordance with the Code of Business Ethics and other relevant Policies.

The identity of the reporting person shall be protected by the Compliance Officer, except in the following cases:

- The reporting person has disclosed their identity,
- Disclosure of identity is required for competent law enforcement authorities to investigate the matter or for an effective response to the report,
- Disclosure of identity is required by law.

Egebant commits to protecting reporting persons and applies zero tolerance to any actions or negligence that may place them in an unfavorable position, including but not limited to:

- Recruitment processes,
- Training, education, or professional development,
- Promotion, performance evaluation, or title changes,
- Disciplinary measures and penalties,
- Working conditions,
- Termination of employment,
- Earnings and compensation,
- Bonus and retirement payments,
- Project changes and transfers,
- Failure to provide protection against harassment by others,
- Referral to mandatory medical examinations or examinations to assess work capability.

### c. Reporting Channels

Allegations and concerns may be reported confidentially through the Ethics Line. Ethics Line service providers notify only the relevant Compliance Officers in order to ensure appropriate evaluation of the matter.

Compliance Officers prepare reports of incoming notifications and submit them to senior management. Decisions taken by management are communicated to the reporting person (if the person has disclosed their identity), and the decisions are also implemented by the relevant departments.

A person submitting a report via the Ethics Line WhatsApp or the Ethics Reporting form on the website may:

- Prefer not to share their name and contact details in order to remain anonymous,
- Prefer to share their name and contact details with the service provider and allow the information to be forwarded to Egebant. In this case, Egebant may contact the reporting person directly to request additional information needed during the investigation.

Reports can be submitted via:

Ethics Line WhatsApp  
or through the Ethics Reporting Form at:  
<https://www.egebant.com.tr/tr/kurumsal/etik-form>

## 3. APPROPRIATE USE OF THE ETHICS LINE

It should be noted that the Ethics Line is not an Emergency Service. This line should not be used to report incidents that pose an immediate threat to life or property. Immediate responses may not be provided to reports made through this service. In case of emergency, actions should be taken in accordance with the Emergency Response Matrix.

## 4. AUTHORITY AND RESPONSIBILITIES

The Whistleblowing Policy is part of Egebant's Management Responsibility process, and all employees are responsible for complying with this Policy. Violations of this Policy may result in various sanctions, including termination of employment.

Compliance Officers are company employees appointed by the Egebant Board of Directors, who are responsible for monitoring the Company's activities related to this Policy.

This Policy shall be periodically reviewed by Compliance Officers to ensure compliance with new or updated laws and regulations.