

Demir Export

Whistleblowing Policy

CONTENTS

- 1. PURPOSE AND SCOPE 3
- 2. DEFINITIONS 3
- 3. GENERAL PRINCIPLES 4
- 4. APPLICATION OF THE POLICY 4
 - 4.1. Disclosable Matters 4
 - 4.2. Notification Methods 5
 - 4.3. Global Incident Dashboard 5
 - 4.4. Confidentiality, Anonymity and Integrity 6
 - 4.5. Zero Tolerance to Retaliation 7
 - 4.6. Investigation Process 7
 - 4.7. Expectations from the Whistleblowers 8
- 5. AUTHORITY AND RESPONSIBILITIES 9
- 6. REVISION HISTORY 9

1. PURPOSE AND SCOPE

The purpose of this Whistleblowing Policy (“the **Policy**”) is to encourage employees and all stakeholders of Demir Export, to report any activity considered or suspected to be illegal or a misconduct, which therefore constitutes a violation of the applicable legislation and/or Demir Export Code of Ethics and relevant policies. It also aims to clearly and explicitly state how the employees who in good faith made a notification are protected against any retaliation.

All employees and directors of Demir Export shall comply with this Policy, which is an integral part of Demir Export Code of Ethics.

2. DEFINITIONS

“**Authorized Person(s)**” mean the terms defined in Article 4.3

“**Business Partners**” includes supplier, distributor, authorized service providers, all kinds of representatives, contractors and consultants acting for and on behalf of the Company

“**Dashboard**” means the term defined in Article 4.3.

“**Dashboard Users**” means the term defined in Article 4.3.

“**Demir Export**” means Demir Export A.Ş. and companies which are controlled directly or indirectly, jointly or individually by Demir Export A.Ş. and the joint venture companies of Demir Export A.Ş.

“**Disclosable Matter(s)**”, mean the term defined in Article 4.1.

“**Disciplinary Penalty**” refers to the type of punishment imposed for breach of employment contract, and/or a behavior that constitutes a violation of applicable legislation and/or a breach of Demir Export Code of Ethics, related policies, procedures, guidelines, circular notes, and all applicable regulations.¹

“**Field Worker**” refers to the persons working within Demir Export in jobs based on manual labor and physical strength for a determined daily wage.

“**HR**” means Demir Export Human Relations Directorate.

“**Investigation**” refers to the conduct of a scrutiny over ascertaining facts where detailed or attentive examination is performed for related actions and behaviors to ascertain the accuracy.

“**Line Manager**” means the primary manager with whom the employee is directly affiliated.

“**Notification**” means sharing observations and concerns about actions which are suspected to violate laws, internal arrangements such as Demir Export of Ethics, relevant internal policies, procedures, and regulations according to this Policy.

“**Retaliation**” means any negative action against the employee based on his/her notification, including but not limited to demotion, disciplinary action, firing, salary reduction, job or shift reassignment as a punishment.

¹ See Demir Export Disciplinary Policies for details.

“**Whistleblower**” means the person who reports notification. This definition covers persons who are or have been employed at Demir Export, Demir Export clients, subcontractors, Business Partners and all other stakeholders.

3. GENERAL PRINCIPLES

Demir Export attributes great importance to be fully compliant with applicable legislation, performs its activities with integrity and according to the highest ethical standards, and supports “open communication” and “accountability” culture to prevent unethical or illegal actions.

Therefore, Demir Export encourages its employees who witnesses an illegal or unethical activity performed by Demir Export, another employee or a Business Partner directly or indirectly, or who gain information about such a situation through legal channels, or who suspect such a situation to express their concerns, and encourages their stakeholders to act in this manner.

Demir Export carefully assesses all reported notifications, and aims to investigate alleged violations as explained below. In this regard, all investigations are conducted as soon as possible after the notification is received by considering the results of the pre-assessment.

4. APPLICATION OF THE POLICY

4.1. Disclosable Matters

Any illegal or unethical behavior or activity which are listed under the headings below (including but not limited to them), and which occurred in the past, may be occurring at the time of notification or is expected to occur in the future may be the subject of Whistleblowing.

Unfair practices against employees Demir Export provides a safe, peaceful and professional working environment for its employees. Therefore, any action against Demir Export employees which contradict with the regulations, Demir Export Code of Ethics or relevant policies and safe and peaceful work environment, is not tolerated.

Acts against the interest of the Company While performing their duties, all Demir Export employees act according to our fundamental values and Code of Ethics, and avoid behaviors and activities that may cause material and/or moral harm to Demir Export. This can only be achieved when all employees internalize and maintain integrity, honesty, responsibility, trust and respect, which are Demir Export’s fundamental values. Therefore, any action by Demir Export employees that violates our fundamental values shall not be tolerated, regardless of the employee’s seniority or roles.

i. Noncompliant actions of Business Partners

Demir Export monitors and evaluates the risks associated with its Business Partners in order to ensure compliance with the principles outlined Demir Export Code of Ethics and related policies, in particular Demir Export Supply Chain Compliance Policy. We do not tolerate any behavior by our Business Partners that violate our Code of Ethics and related policies.

Regulatory breaches *Demir Export complies with the regulations in every country where it operates, and in cases where such regulations are unclear, encourages to consult experts to collect information, and expects its employees to act according to the Demir Export Code of Ethics. The violation of local and or international laws including but not limited to sanctions and export controls, anti-bribery and corruption activities, prevention of laundering proceeds of crime and financing terrorism, protection of competition and personal data, and Capital Market law is not tolerated.*

Each of the matters explained in paragraphs (i), (ii), (iii) and (iv) above shall be referred to as “Disclosable Matter” alone and as “Disclosable Matters” together.

4.2. Notification Methods

Ethics Hotline, operated by independent service providers 7 days a week and 24 hours a day, is the main reporting method to report a Disclosable Matter.

Ethics Hotline can be reached by:

- Calling a national and free telephone number;²
- A web-based reporting system via koc.com.tr/ihbarbildirim.

In addition to the channels above, Whistleblowers can use the alternative methods below to raise their concerns:

- He/She may reach out to his/her Line Manager or supervisor if he/she is an employee of Demir Export at the time complaint.
- He/She may communicate his/her concern to the Risk Management and Audit Department or the officer or Legal and Compliance Department in Demir Export.³

If an employee, manager, coordinator or director (including the members of the Board of Directors) becomes aware of a Disclosable Matters directly, and/or if someone else informs him/her about a Disclosable Matter , he/she is expected to report the situation to Demir Export Risk Management and Audit Department or to Demir Export Legal and Compliance Department in case of Private Law violations to ensure that the report is processed according to this Policy, and all information is consolidated as soon as possible.

4.3. Global Incident Dashboard

Regardless of the Notification method used, all Reports are consolidated at the Global Incident Dashboard (“**Dashboard**”) by the Dashboard Users (defined below). The data in the Global Report Tracking System reported by whistleblower cannot be changed or deleted by the users. Dashboard Users can study, arrange and/or monitor these reports. Moreover, the Dashboard automatically consolidates the reports by using the information below, and prepares it for pre-assessment:

- Notification date and time,

² Please refer to “koc.com.tr/hotline” for telephone numbers, covered countries and service languages.

³ If a Report is sent to the internal audit department or officer or department in charge of compliance in Demir Export, it must be ensured that the notifications are recorded in Global Incident Dashboard

- Whistleblower information (*if available*),
- Demir Export A.Ş. or information of its related Company or Joint Venture, location, department and name of the employee,
- Incident date, time and area,
- Detailed explanation provided by the Whistleblower

To ensure confidentiality, and protect the Whistleblowers, access to the Dashboard is provided only to authorized personnel working at the risk management and audit function or the officers in charge of compliance in Demir Export ("Dashboard User"). Dashboard Users perform an independent duty, and the reports must be examined by persons who would not lead to conflict of interest.

Demir Export Legal and Compliance Department shall periodically analyze the data (e.g. the type and frequency of the incidents, the departments which are regularly reported, etc.) in the Dashboard and work with the relevant departments to ensure that necessary action is taken to address the relevant compliance risks and improve compliance deficiencies.

Demir Export Legal and Compliance Department reports the activities carried out within this scope, including the decisions of the transaction and disciplinary board, to the Board of Directors of Demir Export every six months.

4.4. Confidentiality, Anonymity and Integrity

Demir Export respects Whistleblower's preference to remain anonymous. In this scope, any information reported through Ethics Hotline and other alternative channels are kept confidential to the extent permitted by the laws.⁴

Accordingly, to the extent permitted by laws, the details of a Notification and all other information gathered during an Investigation shall be shared with persons who are authorized to (i) investigate, (ii) evaluate the subject, and (iii) take action if his/her name is not mentioned in the notification. For the avoidance of doubt, any person whose name is mentioned in a Notification, shall not be authorized to have access or be involved in the assessment or Investigation process.

Confidentiality of the investigation is essential, and the department conducting the investigation is not obligated to give information about the process and result of the investigation to the Whistleblowers.

All individuals who provide information during an Investigation also have an obligation to keep the information they provided or any information they may learn during the Investigation. Likewise, it is obliged to protect and respect the existence of the Investigation, its confidentiality, and individuals involved in the process.

A Whistleblower has the following options while reporting an incident:

- i. Not share his/her name and contact information to remain anonymous,
- ii. Share his/her name and contact information, and allow the notification of this information only to the authorized persons. In this case, the relevant authorized

⁴ See "4.2 Whistleblowing Methods" for alternative whistleblowing channels.

employees can contact the Whistleblower directly to request any information that is needed during an Investigation.

4.5. Zero Tolerance to Retaliation

Demir Export encourages individuals to easily report their concerns and supports them. It is crucial that an employee who submits a Notification should feel comfortable and safe and should not worry that their professional life will be adversely effected as long as he/she acts honestly and in good faith.

Therefore, the employment contract of an employee who reports an incident without remaining anonymous cannot be terminated with or without cause, he/she cannot be suspended, dismissed, forced to take paid or unpaid leave, or his position cannot be changed, or a similar action cannot be taken.

Demir Export does not tolerate any Retaliation to Whistleblower under any circumstances. Retaliations are considered an explicit violation of this Policy and are subject to Disciplinary Penalty.⁵

Demir Export protects the Whistleblowers even if accuracy of the incident could not be proved by an Investigation, so long as the Notification is made in good faith, with reasonable grounds and without an intent to victimize or create disadvantages to others or gain a personal advantage.

However, those who deliberately make false Notifications may be subject to Disciplinary Penalties. Therefore, it is extremely important that the Notifications are based on observations and can be proved, if possible.

4.6. Investigation Process

All reports communicated through the Hotline and other alternative channels are evaluated by the risk management and audit department of the relevant Demir Export companies and/or Dashboard Users comprised of compliance officers according to their subjects. The purpose of the evaluation is to verify the Notification's subject and determine whether the information provided is reliable.

If there is a need to conduct an investigation, then the investigation will be carried in line with Demir Export internal procedures. If the notification is related to an Demir Export Field Worker, the process will be carried out in accordance with the Demir Export Disciplinary Regulation. In this process, information which the Whistleblower has obtained through illegal methods, if any, shall not be taken into consideration during the Investigation.

Depending on the department that is responsible for conducting the Investigation about subjects within the jurisdiction of Demir Export, Risk Management and Audit Department or Legal and Compliance Department may (i) request the support/contribution of each other, and (ii) consult to other departments for professional expertise when necessary during the Investigation period. Demir Export HR provides line of sight to the Investigation process in particular when the

⁵ See Demir Export Disciplinary Policy for details.

relevant incident is allegedly an unfair practice against an employee and if the investigation is about a Field Worker.

A lawyer from the Legal and Compliance Department shall be responsible for providing line of sight where necessary, in particular when the relevant incident is allegedly a violation of applicable laws (criminal law, labor law etc.) He/she shall also take necessary action if the local authorities need to be notified as per applicable laws.

The units responsible for the Investigation in the first degree shall inform the other relevant department(s) before concluding the Investigation and issuing the final report and receives their recommendation (if any). The relevant department shall share its recommendations as soon as possible and in any event without causing any delay in the process.

If it is deemed necessary for the soundness and efficiency of the Investigation, the employees subject to the Notification may be suspended or dismissed from work temporarily. The approval of the General Manager is required for such a decision.

In Investigations conducted, if there are valid reasons that could affect neutrality and independent decision-making in case of the existence of a hierarchical or functional conflict of interest, and/or if the name of the authorized department is mentioned in the Notification, or if it is necessary to conduct a comprehensive examination, or if the investigation is carried out at a location different from the country where Demir Export headquarters are located (e.g need for fast and efficient investigations, special expertise, linguistic barriers etc.), the Investigations in Demir Export can be carried out by independent third party service providers. In such a circumstance, the decision to outsource the case to third parties is subject to the relevant approvals.

If there is a recommendation for a Disciplinary Penalty as a result of the Investigation, the relevant matter shall be brought to the attention of the HR and Industrial Relations Directorate at Demir Export or Ethics Committee or Discipline Committee of Demir Export depending on the nature of the incident and the person subject to the Investigation.

4.7.Expectations from the Whistleblowers

In order to ensure that “Disclosure Matter” is well understood clearly and can be evaluated properly and fairly, the Whistleblower is expected to provide sufficient and detailed information as possible. Therefore, Notification to be made by Whistleblowers must contain the answers to the questions below as much as possible:

- Names of the suspect(s),
- Detailed information about the subject;
 - o When/where/among whom did the incident take place?
 - o How many times did the incident take place? Is it recurring? When did it occur for the first time?
 - o If it has not occurred yet, when is it expected to occur?
 - o When did the Whistleblower become aware of the subject?
 - o Who else is aware of the issue? If the managers know the issue, have they taken any measures to prevent it?

- Did the Whistleblower directly witness the incident, or did he/she hear it from someone else?
- Did the Whistleblower inform his/her managers? If not, why?
- Is there any evidence about the notified concern?

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Demir Export are responsible for complying with this Policy, implementing and supporting Demir Export's procedures and controls in accordance with the requirements in this Policy. Demir Export takes necessary steps to ensure that all its Business Partners are informed about this Policy.

If there is a discrepancy between the local regulations, applicable in the countries where Demir Export operates, and this Policy, subject to such practice not being a violation of the relevant local regulations, the stricter of the two, supersede.

Demir Export employees may consult the Legal and Compliance Department in Demir Export for their questions related to this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

6. REVISION HISTORY

This Policy takes effect on 27.10.2022 as of the date approved by the Board of Directors and is maintained by Legal and Compliance Department.

Revision	Date	Comment