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**ÖZALTIN HOLDING A.Ş.**

**WHISTLEBLOWING POLICY**

**1. PURPOSE AND SCOPE**

The purpose of this Whistleblowing Policy (“Policy”) is to encourage Company employees and stakeholders to report to the Company any actions they suspect may violate the Code of Ethics, relevant policies, or applicable laws. Additionally, the Policy aims to clearly and explicitly state that Company employees who report in good faith are protected against any retaliatory actions they may face.

All Company employees and managers are required to act in accordance with this Policy, which is an integral part of the Company’s Code of Ethical Conduct.

**2. DEFINITIONS**

“**Immediate Supervisor**” refers to the employee’s first-line manager.

“**Disciplinary Action**” refers to sanctions imposed due to conduct that violates the employment contract and/or applicable laws and regulations and/or the Ethical Principles, relevant policies, procedures, regulations, circulars, etc., as well as other internal Company regulations<sup>1</sup>.

“**Code of Ethics**” refers to the set of rules and values encompassing the fundamental principles of conduct outlined in the Özaltın Holding A.Ş. Code of Ethical Conduct.

“**Reportable Matters**” refers to the term defined in Article 4.1.

“**Report**” refers to the sharing of observations and concerns regarding actions suspected of violating or potentially violating applicable laws, the Ethical Principles, relevant internal company policies, procedures, regulations, or other internal rules, in accordance with this Policy.

“**Whistleblower**” refers to the person making the report.

“**HR**” refers to the Human Resources Department.

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<sup>1</sup> For more information, please refer to the Özaltın Holding A.Ş. Disciplinary Policy.

**“Business Partners”** includes suppliers, customers, contractors, and any representatives, subcontractors, consultants, and other third parties with whom the Company has a business relationship, as well as the employees and representatives of such parties.

**“Retaliation”** means any adverse action taken against an employee for making a report, including but not limited to demotion, disciplinary action, termination, reduction in salary, or changes to their duties or shift schedule.

**“Özaltın Holding”** refers to Özaltın Holding A.Ş.

**“System”** refers to the term defined in Section 4.3.

**“System Users”** refers to the term defined in Article 4.3.

**“Investigation”** refers to detailed and careful examination efforts conducted to determine the facts regarding relevant actions and behaviors.

**“Company”** refers to Özaltın Holding Inc., Özaltın Construction, Trade, and Industry Inc., Özaltın Hotel Operations Inc., Özaltın Greenhouse and Trade Inc., Özaltın Energy Production and Construction Inc., Zenit Mining Industry and Trade Inc., Enova Wholesale Electricity Sales Inc., Enova Energy Production Inc., Özaltın Import Export and Construction Inc., Özaltın Mining Trade and Industry Inc., Özaltın 2 Energy Investments Inc., Özaltın 3 Energy Investments Inc., Nova Investment S.A., and Pontid Mining Industry and Trade Inc.

**“Authorized Person(s)”** refers to the term defined in Article 4.3.

### 3. GENERAL PRINCIPLES

The Company places great importance on compliance with applicable laws; it conducts its operations with the highest ethical standards and in good faith; and it supports a culture of “open communication” and “accountability” to prevent unethical or unlawful actions.

Therefore, the Company expects employees who have directly or indirectly witnessed any unlawful activity or unethical incident involving an employee or a Business Partner, who have obtained information about such a situation through legal channels, or who suspect such a situation, to voice their concerns, and encourages its stakeholders to do the same.

The Company carefully evaluates all reports submitted to it and aims to investigate the allegations as follows. In this regard, all investigations are conducted as soon as possible following the receipt of the report, taking into account the results of the preliminary assessment.

### 4. IMPLEMENTATION OF THE POLICY

#### 4.1. Reportable Matters

Any unlawful or unethical conduct or activity listed under the following headings (but not limited to them)—whether it occurred in the past, is ongoing at the time of the Report, or is expected to occur in the future—may be the subject of a Report.

**i. Actions Against Employees:** The Company provides a safe, respectful, and professional work environment for its employees. Therefore, the Company will not tolerate any action against employees that may violate applicable laws, the Code of Ethics, or relevant policies, or that may jeopardize the safety, professionalism, and respectful nature of the work environment.

**ii. Actions Against the Company:** All Company employees, while performing their duties, act in accordance with our core values and the Code of Ethics, and avoid behaviors and activities that could cause material and/or moral harm to the Company. This is only possible if the Company’s core values—integrity, honesty, responsibility, trust, and respect—are internalized and upheld by all employees. Therefore, no tolerance will be shown for behavior contrary to our core values, regardless of an employee’s seniority or role.

**iii. Violations by Business Partners:** The Company monitors and assesses risks associated with Business Partners to ensure compliance with the matters outlined in the Code of Ethics, including the Supply Chain Compliance Policy, and relevant policies. No tolerance is shown for any conduct by our Business Partners that violates our Code of Ethics, relevant policies, or applicable laws.

**iv. Violations of Specific Laws:** The Company complies with regulations in the countries where it operates and, in cases where regulations are unclear, encourages its employees to seek guidance from subject matter experts; in all cases, the Company expects its employees to act in accordance with the Code of Ethics. No tolerance is shown for violations of local or applicable international laws, including but not limited to sanctions and export controls, anti-bribery and anti-corruption, prevention of money laundering and terrorist financing, competition, protection of personal data, and Capital Markets legislation.

Each of the matters described in the subheadings numbered (i), (ii), (iii), and (iv) above shall be referred to individually as a “Reportable Matter” and collectively as “Reportable Matters.”

## 4.2. Reporting Methods

The Ethics Hotline may be accessed through the following channels, which are accessible to the Legal and Compliance Counsel and the Director of Audit and Organization:

- By submitting a written report to the email address [etik@ozaltin.com.tr](mailto:etik@ozaltin.com.tr),

- By submitting an anonymous report through the Ethics Line Application Form available on the Company's website.

In addition to the above, Reporters may use the following alternative methods to voice their concerns:

- If the whistleblower is an employee of the Company at the time of the report, they may contact their Line Manager,
- or report their concern directly to the Legal and Compliance Department or an authorized representative.

If an employee or manager (including members of the Board of Directors) becomes directly aware of a Reported Matter or is informed of such a matter, they are expected to report the situation without delay to the Özaltın Holding Internal Audit Department so that the report can be addressed under this Policy and the information consolidated; in cases of violations of specific laws, the report should be made to the Legal and Compliance Department.

#### **4.3. Confidentiality, Anonymity, and Integrity**

The Company respects the Whistleblower's preference to remain anonymous. In this context, all information reported via the Ethics Hotline and other alternative methods is kept confidential to the extent permitted by law.

Accordingly, to the extent permitted by law, the details of a report and all other information obtained during an investigation process are shared only with individuals who have the authority to (i) investigate, (ii) evaluate the matter, and (iii) take action—provided that the individual's name does not appear in connection with the reported action. To avoid any doubt, any person named in a report or notification has no authority to access or participate in the evaluation or investigation process.

The confidentiality of the investigation is paramount, and the department conducting the investigation has no obligation to provide the Whistleblower with information regarding the progress or outcome of the investigation.

All individuals providing information during the investigation are obligated to keep both the information they provide and any information they may learn during the investigation confidential, and to protect the existence and confidentiality of the investigation, as well as to respect the individuals involved in the process. A Whistleblower has the following options when reporting an incident:

- i. Remain anonymous by not sharing their name and contact information,

ii. To share their name and contact information, thereby allowing such information to be disclosed only to authorized individuals. In this case, the Whistleblower may be contacted directly to request any information needed during an investigation.

#### **4.4. Zero Tolerance for Retaliation**

The Company encourages and supports the expression of concerns. It is crucial that an employee making a report feels comfortable and safe, and does not fear that their professional life will be negatively impacted as long as they act in good faith and with integrity. Therefore, an employee who makes a report without remaining anonymous may not have their employment contract terminated, be suspended, be removed from their position, be placed on paid or unpaid leave, have their work location changed, or face any similar action, whether with or without cause. The Company will not tolerate any form of retaliation against a Whistleblower. Retaliation is considered a clear violation of this Policy and is subject to disciplinary action<sup>2</sup>.

The Company protects Whistleblowers provided that the report is made in good faith and with reasonable grounds, and not with the intent to cause harm, inflict damage, or seek personal gain, even if the accuracy of the incident cannot be proven through an Investigation. However, if it is determined during an investigation that the Whistleblower intentionally and in bad faith made a false report, that employee may be subject to the disciplinary process and disciplinary sanctions. For this reason, it is of the utmost importance that reports be based on observations and, if possible, be verifiable.

#### **4.5. Investigation Process**

All reports submitted via the Ethics Hotline or other alternative methods are first evaluated by System Users—comprising staff from the Özaltın Holding Internal Audit Department and the Özaltın Holding Legal and Compliance Department—depending on the subject matter. The purpose of this evaluation is to verify the subject of the relevant report and determine whether the reported information is reliable.

Based on the preliminary evaluation, if the matter falls within the Company's jurisdiction, the Company System User is authorized to decide whether to conduct a thorough investigation—that is, to initiate an investigation or close the case. If an investigation is deemed necessary, the process is conducted in accordance with the Company's internal procedures. Information obtained by a Whistleblower (if any) through unlawful means will not be considered during the Investigation process.

The unit primarily responsible for the Investigation informs other relevant departments and solicits their recommendations (if any) before concluding the

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<sup>2</sup> For more information, please refer to the Özaltın Holding A.Ş. Disciplinary Policy.

Investigation and publishing the final report. In such cases, the departments consulted share their recommendations as soon as possible and in any event in a manner that does not cause any delay in the process.

Taking into account the integrity and effectiveness of the investigation, employees who are the subject of the report may be temporarily suspended from duty or removed from their positions if deemed necessary. If the investigation is conducted by authorized functions within the Company, the decision to take such action requires the opinion of the Özaltın Holding Internal Audit Department and the Özaltın Holding Legal and Compliance Department, as well as the approval of the Company's General Manager and the Board of Directors.

In investigations conducted within the Company, if there is any hierarchical or functional conflict of interest that could affect impartiality and independent decision-making, and/or if the name of the authorized department is included in the report, or if there are other valid reasons such as the need for a comprehensive review or the investigation being conducted in a location different from the country where the Company's headquarters is located, (e.g., the need to conduct the investigation quickly and efficiently, the requirement for specialized expertise, language barriers, etc.), investigations may be conducted by independent third-party service providers.

If the report prepared as a result of the investigation contains a recommendation for disciplinary action, the matter is submitted to the Özaltın Holding Human Resources Department and brought to the attention of the Özaltın Holding Ethics/Disciplinary Committee, depending on the nature of the incident and the individual subject to the investigation.

#### **4.6. What Is Expected of Whistleblowers**

To ensure that the reported incident can be clearly understood and evaluated accurately and fairly, a whistleblower is expected to provide as much sufficient and detailed information as possible. Therefore, reports submitted by whistleblowers are expected to include, to the extent possible, answers to the following questions: -

- The names of the suspected individual(s),
- Detailed information regarding the matter;
  - o When, where, and between whom did the incident occur?
  - o How many times has it occurred? Is it recurring? When did it first occur?
  - o If it has not yet occurred, when is it expected to occur?
  - o When did the reporter become aware of the issue?
  - o Who else is aware of the issue? If managers are aware of the issue, have they taken any measures to prevent it?

- Did the whistleblower witness the incident directly, or did they hear about it from someone else?
- Did the whistleblower inform their managers? If not, why?
- Is there any evidence regarding the reported matter?

## 5. AUTHORITY AND RESPONSIBILITIES

All employees and managers of the Company are responsible for complying with this Policy and for implementing and supporting relevant Company procedures and controls in accordance with the requirements of this Policy. The Company takes the necessary steps to ensure that all Business Partners are informed about this Policy.

In the event of a discrepancy between this Policy and the applicable laws in the countries where the Company operates, the more restrictive of this Policy or the applicable laws shall prevail, provided that such application does not conflict with local laws.

Company employees may consult the Legal and Compliance Department, which is responsible for compliance, regarding any questions about this Policy and its implementation. A violation of this Policy by an employee may result in various disciplinary actions, including termination of employment, in accordance with the Labor Code, other relevant legislation, and the Company's internal policies and regulations. If any third party expected to act in compliance with this Policy acts in violation of it, the contracts entered into with such a person may be terminated.

## 6. EFFECTIVE DATE

This Policy entered into effect pursuant to the Board of Directors' Resolution dated April 22, 2025, and the Legal and Compliance Department is responsible for updating the Policy.

Revision	Date	Description
1	April 22, 2025	Review
2	September 26, 2025	Report submission channels have been updated, and some grammatical and stylistic errors in the text have been corrected.
3	January 9, 2026	Clarification has been provided to the relevant authorities regarding the

		evaluation of reports.
4	March 10, 2026	Terminology related to the organizational structure has been updated, and some grammatical and stylistic errors in the text have been corrected.
5	May 14, 2026	The Ethics Line Application Form has been added to the whistleblowing reporting channels.