

ÇAKIRLAR PRINTING NOTIFICATION PROCEDURE

1. Purpose and Scope

Çakırlar Printing has established a secure and confidential whistleblowing mechanism for employees, suppliers, and other stakeholders in order to protect ethical values and detect possible violations. This procedure encourages the reporting of unethical conduct, bribery, fraud, conflicts of interest, information security breaches, and other forms of misconduct. It also commits to protecting the rights of individuals who file reports.

2. Procedure Steps

2.1. Submitting a Report

Reports may be submitted anonymously or with identification through the following channels:

- **Ethics Whistleblower Line:** [+90 212 671 13 53]
- **Email:** [etik@cakirlar.com]
- **Online Form:** [https://cakirlar.com/iletisim]

The following details are recommended when submitting a report:

- Date and location of the incident,
- Identity of the involved parties (optional),
- Detailed description of the event,
- Supporting evidence (documents, visuals, etc.), if available.

Reportable Issues Include:

- **Bribery and Corruption:** All forms of bribery and corruption.
- **Money Laundering:** Laundering of criminal proceeds.
- **Transparency Violations:** Untransparent practices and misuse of resources.
- **Fraud and Conflicts of Interest:** Financial fraud and conflicts of interest.
- **Abuse of Authority:** Misuse of power or any form of misconduct.
- **Child Labor and Forced Labor:** Use of child labor, forced labor, and human trafficking.
- **Misuse of Company Resources:** Misuse of financial, physical, or digital assets.

- **Information Security and Privacy:** Data breaches and unauthorized access.
- **Discrimination and Harassment:** Discrimination based on race, gender, religion, age, etc., and harassment or mobbing.
- **Sexual or Verbal Abuse:** Sexual or verbal abuse toward employees or stakeholders.
- **Policy and Procedure Violations:** Breaches of company policies or procedures.
- **Other Offenses and Misconduct:** Any other unethical or unlawful behavior.
- **Occupational Health and Safety:** Violations or complaints about workplace safety.
- **Environmental Violations:** Activities harmful to the environment.

2.2. Receiving and Reviewing the Report

All reports submitted to Çakırlar Printing are reviewed by the Ethics Committee under strict confidentiality. Upon receipt, a preliminary review is conducted to assess accuracy and detail. Additional information may be requested if necessary, but the whistleblower's identity will remain protected.

2.3. Investigation Process

• Initiation of Investigation

An investigation team is assigned based on the nature of the report. This team conducts a comprehensive inquiry to understand the details and accuracy of the allegation. Evidence is collected, interviews are conducted, and a proposed resolution is drafted. Investigations are usually completed within 30 working days, but may be extended for complex cases.

• Assignment and Conduct of the Investigation

An expert team is formed by the Ethics Committee. They act with confidentiality, neutrality, and professionalism. Internal audit units or independent consultants may be involved if needed. The validity and seriousness of the report are assessed, including consistency, evidence, and risks. Further information may be requested from the whistleblower or related parties.

• Evidence Collection and Analysis

Documents, interviews, and site inspections are used to collect evidence. Financial records, emails, contracts, and security footage are reviewed. Open-ended and unbiased questions are asked during interviews, all of which are conducted confidentially. Field audits or digital system analyses may also be conducted.

• Evaluation and Solution Proposals

After evidence analysis, the team assesses whether the incident violates company policies, its scope, impacts, recurrence potential, and systemic risks. Solutions may include disciplinary action, process improvement, legal action, training, or awareness activities. Collaboration with NGOs or external experts may be considered.

- **Reporting Results and Action Plan**

A detailed report is submitted to the Ethics Committee, including objectives, scope, evidence, findings, and recommendations. The Committee ensures appropriate actions are taken and shared with relevant departments. Implementation is monitored and updated if needed.

- **Feedback and Confidentiality**

Upon completion, the whistleblower is informed of outcomes and actions. All feedback is handled in strict confidentiality, preserving the whistleblower's anonymity. The process prioritizes confidentiality and neutrality throughout.

Approved by: ORHAN ÇAKIRLAR
GENERAL MANAGER