

ÇAKIRLAR PRINTING COMPANY REPORTING PROCEDURE

1. Purpose and Scope

Çakırlar Matbaacılık has established a secure and confidential whistleblowing mechanism for employees, suppliers, and other stakeholders to protect ethical values and detect potential violations. This procedure encourages the reporting of unethical behavior, bribery, fraud, conflicts of interest, information security breaches, and other improprieties. It also guarantees the protection of the rights of those who report such incidents.

2. Procedure Steps

2.1 . Making the Notification

Breach reports can be made anonymously or with an open identity. The following channels can be used for reporting:

Ethics Reporting Hotline: [+90 212 671 13 53]

Email: [etik@cakirlar.com]

Online Form: [<https://cakirlar.com/iletisim>]

When reporting, it is recommended to share the following information:

- Date and location of the incident,
- Identity information of the relevant parties (optional),
- Detailed description of the incident,
- Supporting evidence, if any (documents, images, etc.).

What Issues Can Be Reported?

- **Bribery and Corruption:** All types of bribery and corruption.
- **Money Laundering:** Money laundering and illicit activities.
- **Transparency Violations:** Non-transparent partnerships and misuse of resources.
- **Fraud and Conflicts of Interest:** Fraud, financial irregularities, and conflicts of interest.
- **Abuse of Power:** Abuse of authority and all forms of misconduct.
- **Child Labor and Forced Labour:** Child labor, forced labour, and human trafficking.

- **Misuse of Company Resources:** Improper use of financial, physical, or digital company resources.
- **Information Security and Privacy:** Information security vulnerabilities, data privacy breaches, and unauthorized access.
- **Discrimination and Harassment:** Discrimination, harassment, and mobbing based on race, gender, religion, age, or other grounds.
- **Sexual or Verbal Abuse:** Sexual or verbal abuse of employees or stakeholders.
- **Policy and Procedure Violations:** Behaviors that violate the company's established policies and procedures.
- **Other Crimes and Torts:** All other behaviors that violate legal or ethical norms.
- **Occupational Health and Safety:** Complaints regarding working conditions, occupational safety violations, and the work environment.
- **Environmental Violations:** Activities that harm the environment, environmental pollution, and environmental-related complaints.

2.1.1. Protection of Whistleblowers

During the process of receiving and evaluating notifications, the identity of the whistleblower is protected within the framework of confidentiality principles. Any retaliation, dismissal, reassignment or negative treatment against persons who make a report in good faith is strictly prohibited. Such attempts at retaliation are also considered an independent violation and are subject to appropriate review processes.

2.2 .Receiving and Reviewing the Notification

Notifications made at Çakirler Matbaacılık are evaluated by the Ethics Board in accordance with the principle of confidentiality. When notifications are received, an investigation process is first initiated to understand their accuracy and details. Additional information may be requested when deemed necessary, but in this process, the identity of the whistleblower is kept strictly confidential and the principle of confidentiality is adhered to.

2.3 .Research Process

Starting the Research Process

The research process begins with the appointment of a research team in accordance with the nature of the notification. This team conducts a comprehensive review to understand the details and accuracy of the notification. During the investigation process, evidence is collected in order to shed light on all aspects of the incident, interviews are held with the relevant parties and an appropriate solution proposal is prepared. The investigation is generally scheduled to be completed within 30 business days; However, in complex cases, this period may be extended and the whistleblower will be informed about the process.

Appointment of the Research Team and Conduct of the Investigation

Once notification is received, the Ethics Committee creates a research team with relevant expertise. This team acts in accordance with the principles of confidentiality, impartiality and professionalism. If necessary, the internal audit unit or an independent external consultant may also be involved in the process. In the first step, the validity and seriousness of the notification is evaluated. The accuracy and consistency of the information provided, the existence of concrete evidence and the magnitude of possible risks are analyzed. When necessary, a more comprehensive investigation is conducted by requesting additional information from the informant or other relevant persons.

Evidence Collection and Analysis

During the investigation, evidence is collected using methods such as document review, witness interviews and field inspections. Documents such as financial records, e-mails, contracts, security records are examined in detail. During interviews with relevant parties, open-ended and impartial questions are formulated and these interviews are conducted in accordance with the principle of confidentiality.

In addition, field audits or analyses of digital systems are conducted depending on the nature of the alleged violation.

Assessment and Preparation of Solution Proposals

After analyzing the collected evidence, it is assessed whether the incident violates the company's policies and procedures, the scope and effects of the violation, the likelihood of recurrence, and potential systemic risks. Solution proposals are prepared taking into account relevant laws and regulations. The investigation team may develop solutions such as disciplinary actions, process improvement suggestions, legal proceedings, training programs, or awareness-raising activities. If deemed necessary, cooperation with relevant non-governmental organizations may be established, or support may be sought from experts in the field.

The following specific principles are applied in the assessment process depending on the nature of the notification:

- In cases of discrimination and/or harassment, the relevant situation is evaluated within the framework of confidentiality, impartiality, and the protection of employee rights; necessary remedial, protective, and preventive steps are implemented.
- In notifications of child labor, forced labor, or human trafficking cases, in addition to the standard investigation process, the protection of the victim's safety and rights is immediately prioritized; the violation is stopped, and necessary corrective and preventive actions are initiated.
- In reporting information security breaches, the goal is to record the incident within 24 hours and, in cases of serious breaches, to complete root cause analysis and corrective action within 30 days.

Reporting Results and Action Plan

After the investigation is completed, the findings and recommendations are presented to the Ethics Committee in a detailed report. This report includes the purpose and scope of the investigation, the evidence collected during the process, the analysis results, and the recommended actions. The Committee ensures that appropriate actions are taken in line with the report and communicates this action plan to the relevant departments and managers. The implementation of the action plan is regularly monitored and updated as needed.

Feedback and Confidentiality Principle

Finally, after the completion of the process, the whistleblower is informed about the measures taken and the outcome of the process. This feedback is provided in strict adherence to the principle of protecting the whistleblower's identity, and the principles of anonymity and confidentiality are meticulously observed. Throughout the investigation process, an approach prioritizing confidentiality and impartiality is adopted.

Record Keeping and Monitoring

All notifications, investigation processes, actions taken, and results within the scope of this procedure are recorded. These records are periodically reviewed by the Ethics Committee and used to evaluate the effectiveness of the policy.

Publication Approval: ORHAN ÇAKIRLAR
GENERAL MANAGER