

**COMPANY:** SÖĞÜT İNŞAAT A.Ş.

**DOCUMENT NO:** SGT-KRY-POL-002

**DOCUMENT TITLE:** WHISTLEBLOWING POLICY

**REVISION NO:** 01

**DATE:** December 2025

# 1. PURPOSE AND SCOPE

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The purpose of this Whistleblowing Policy (the "Policy") is to set out the rules and principles applicable to employees of Söğüt İnşaat A.Ş. and its Group Companies ("Söğüt İnşaat" or "Group") and Third Parties as to reporting of any event contrary to Söğüt İnşaat ethical standards and/or legislation to authorized persons, by ensuring that they will not encounter any retaliation when they witness, suspect or are exposed to a contrary incident.

In case of conflict between this Policy and the applicable legislation in the countries in which Söğüt İnşaat operates, the provisions of applicable legislation shall prevail.

Söğüt İnşaat employees and parties acting on behalf of Söğüt İnşaat shall comply with this Policy. Söğüt İnşaat A.Ş. Board of Directors is responsible for the oversight of the process and the Compliance Team is responsible for the execution of the Policy.

## Definitions and Abbreviations

- **Disciplinary Committee:** Committee board that consists of members appointed by Söğüt İnşaat A.Ş. Board of Directors and is authorized to impose disciplinary penalties.
- **Notification or Report:** Written or verbal reporting of known, exposed or suspected situations against Söğüt İnşaat Business Ethics and Code of Conduct and/or applicable legislation by Söğüt İnşaat employees or related Third Parties to the channels specified in this Policy.
- **Retaliation:** Any negative situation that the whistle-blowers may encounter due to the notification they made.
- **Söğüt İnşaat Ethics Hotline:** The reporting channel where Söğüt İnşaat employees or Third Parties may report events, discomforts or doubts that they do not want to share with their supervisors, in violation of the Söğüt İnşaat Business Ethics and Code of Conduct Regulation (SGT-GEN-YNT-003).
- **Third Party:** People or companies with whom Söğüt İnşaat engages in commercial activities including without limitation to suppliers, customers, contractors and business partners.
- **Whistle-blower:** The person making the notification to the channels specified in this Policy.

## 2. GENERAL PRINCIPLES

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It is Söğüt İnşaat's of importance to carry out its activities in accordance with generally accepted ethical standards and applicable legislation. It is the duty of all employees to notify Söğüt İnşaat management of any action that may prevent Söğüt İnşaat from fulfilling this requirement, such as violation of legal regulations, abuse, conflict of interest, corruption, harassment, discrimination, which threatens the general interests of individuals, companies and the society in which they are located, and which may prevent the maintenance of an efficient working environment.

Söğüt İnşaat takes all reports seriously regardless of the identity of the individuals involved, investigates the matter in an equal and effective manner for everyone, and takes the necessary actions.

### 2.1. Subject of the Report

Events to be notified by the employees and Third Parties ("Notice Subject") are, without limitation, illustrated as follows:

- Violation of Söğüt İnşaat Business Ethics and Code of Conduct and its policies;
- Fraud, theft, embezzlement, improper use of company resources;
- Abuse of duties and powers;
- Bribery and corruption;
- Conflicts of interest;
- All kinds of discrimination, mobbing;
- Violence, harassment, insults;
- Laundering proceeds of crime and financing of terrorism;
- Violation of legal regulations;
- Irregularity in accounting records;
- Unauthorized sharing of trade secrets or personal data, insider trading; and
- Health and safety hazard.

Notifications may be made not only for Söğüt İnşaat companies, but also for Third Parties acting on behalf of Söğüt İnşaat.

### 2.2. Content of the Report

To be effectively evaluated and investigated, reports must include, but are not limited to, details of people involved, the date and place, estimated time of occurrence, names of witnesses, and names of supervisors notified before. Whistle-blowers may either share their name or report

anonymously. All received reports are kept confidential unless there is a legal obligation to disclose them.

### **2.3. Channels to Report**

When Söğüt İnşaat employees are exposed to, witness or suspect any unethical event, they may serve notifications to the established reporting channels:

- **Email:** etik@sogut-insaat.com.tr
- **Web:** sogut-insaat.com.tr/ethics
- **Ethics Hotline:** 0312 287 33 13

### **2.4. Evaluation and Investigation**

All notifications received through the Ethics Hotline are evaluated by the Internal Audit and/or Compliance Teams. If further review is required, the Internal Audit Department commences an investigation process. The investigation report is shared with the members of the Disciplinary Committee for necessary actions in accordance with the Söğüt İnşaat Disciplinary Regulation (SGT-GEN-YNT-001).

### **2.5. Confidentiality**

Whistle-blower's information and the report are disclosed strictly on a "need to know" basis. All persons involved in the processes are required to maintain strict confidentiality in accordance with applicable laws.

### **2.6. Prevention of Retaliation**

No type of retaliation such as harassment, violence, change of workplace, mobbing, discrimination, limitation of rights, or dismissal may be imposed on Whistle-blowers due to their report. If an untrue report is made in bad faith or for personal interest, disciplinary action is carried out against the Whistle-blower in accordance with the Disciplinary Regulation (SGT-GEN-YNT-001).

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**Ahmet KAPUSUZ**

Company Manager / Şirket Müdürü