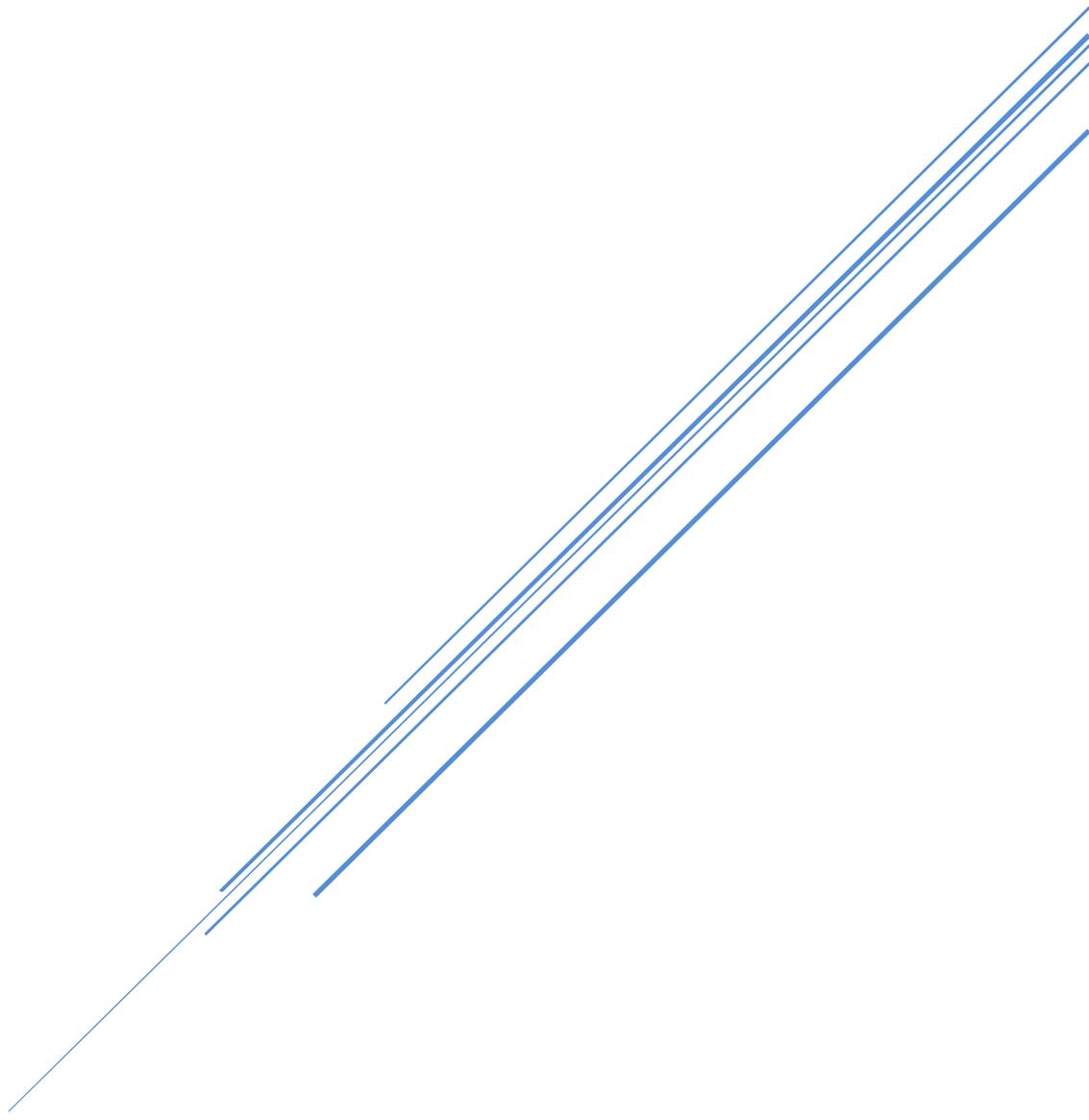




# ER-KIM GLOBAL POLICY

## NOTIFICATION, CONSULTATION AND WHISTLEBLOWING POLICY





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## 1. INTRODUCTION

The Notification, Consultation, and Whistleblowing Policy is a framework text created to consult any situation that is concerned that it may contradict ER-KIM <sup>1</sup> Business Ethics Principles and related Policies and to show the ways and methods of notifications to be made in case of an inappropriate situation.

The policy aims to clearly and explicitly set forth the consultation ways and methods, relevant principles, commitments, demands and attitudes of all employees and third parties on all issues related to ER-KIM Business Ethics Principles, especially on issues such as conflict of interest, misconduct, abuse of authority, etc., for the effective implementation of the anti-bribery and anti-corruption system.

The purpose of this policy is:

- a. It aims to ensure and guide all ER-KIM employees and third parties to timely report incidents suspected to be in violation of ER-KIM Business Ethics Principles and related Policies, especially conflict of interest and misconduct, and to ensure that these risks are managed correctly.

## 2. SCOPE AND APPLICABILITY

This policy applies to all Members<sup>2</sup> or third parties connected with ER-KIM in any business relationship.

In this policy, **third party** means any person or organization you come into contact with while working for ER-KIM, including actual or potential customers, suppliers, distributors, business contacts, agents, consultants, public and governmental institutions and their advisors, representatives, officials, politicians and political parties.

ER-KIM expects third parties acting on its behalf to fully comply with the ER-KIM Code of Business Ethics and all applicable laws.

## 3. GENERAL RULES

ER-KIM adopts the principle of applying the highest ethical and legal standards in all its operations. In order to maximize and maintain the Company's ability to manage the whistleblowing mechanism, employees who believe that the Code of Business Ethics has been violated at work should report the situation to the Ethics Line as soon as possible. The whistleblowing mechanism can be used in the event of unethical behavior, including but not limited to the following:

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<sup>1</sup> "Er-Kim" refers to Er-Kim İlaç Sanayi ve Ticaret Anonim Şirketi ("Er-Kim Turkey") and its affiliates. "Affiliate" means a company directly or indirectly controlled by Er-Kim Turkey. For the purposes of the preceding sentence, "Control" means the power to hold, directly or indirectly, a majority of the voting shares of a company, or the power to exercise, directly or indirectly, by contract or otherwise, those rights, so as to influence the management and administration of the company.

<sup>2</sup> "Member" or "Members" refers to the senior executives, directors, managers and employees of all Er-Kim Turkey and its affiliated companies.



- Violation of the Code of Business Ethics and Related Policies,
- Illegal acts and instructions leading to legal violations, mismanagement, abuse of professional position, threats to public safety and health,
- Failure to comply with legal requirements in the countries where ER-KIM operates,
- Other activities that may harm company operations.

#### **4. PRINCIPLES**

##### **DESCRIPTION OF THE NOTIFIER**

A whistleblower can be any person who reports actions or allegations that are inconsistent with the Global Code of Business Ethics and related Policies.

##### **PROTECTION OF THE NOTIFIER**

All whistleblowers are protected under the ER-KIM Anti-Retaliation Policy. This protection applies even if the allegation raised by the notice cannot be verified. The aim is to ensure the continuity and security of communication and to establish the trust of all employees in the ethics line.

Harassment or victimization of individuals who raise a concern will not be tolerated, and whistleblowers will not be disclosed unless they consent otherwise. Furthermore, ER-KIM will not attempt to identify anonymous notifiers.

Anonymously reported allegations and concerns will be fairly and appropriately considered by the Legal and Compliance Department in accordance with the Code of Business Ethics and other relevant Policies.

The identity of the notifier is protected by the Legal and Compliance Department, except in the following cases:

- The identity of the notifier has been disclosed,
- Requiring identification so that appropriate law enforcement officials can investigate the matter or respond effectively to the report,
- Identification is protected except where it is required by law.

You should be aware that the notifications made under this Policy may be related to highly confidential and sensitive matters and therefore it may be preferable to remain anonymous in notifications or reports to be made. It is reasonable and legitimate if the whistleblower does not wish to disclose his/her identity or if the report is unsigned. No employee or stakeholder shall be obliged to disclose his/her identity. If the notification or report is made anonymously, the name of the person who made the notification or report shall be kept confidential and the entire process/investigation shall be carried out with this confidentiality.

We are committed to protecting whistleblowers and have zero tolerance for negligence and conduct aimed at placing whistleblowers in adverse positions, in particular (i) Recruitment processes; (ii)



Education, training or professional development; (iii) Promotion, performance evaluation or title changes; (iv) Disciplinary measures and penalties; (v) Working conditions; (vi) Dismissal; (vii) Earnings and compensation; (viii) Bonus and pension payments; (ix) Project changes and transfers; (x) Failure to take measures to protect themselves from harassment by others; (xi) Referral for mandatory medical examination or referral for examination to assess work ability.

#### **REPORTING CHANNELS**

Allegations and concerns can be confidentially reported through the Ethics Hotline, managed by an independent third-party service provider. Ethics Hotline service providers only notify the relevant Legal and Compliance Department for the most appropriate consideration of the matter. A person who reports to the Ethics Hotline via web, email or phone;

- They can choose not to share their name and contact details to ensure that their information remains anonymous,
- It may choose to share its name and contact information and allow the information to be transmitted to ER-KIM. In this case, ER-KIM may contact the informant directly to request the information needed during the research,
- He or she may choose to disclose his or her name and contact details only if it becomes impossible to continue the investigation. In this case, ER-KIM may, if necessary, contact this person to obtain additional information with his/her consent.

Notifications can be made via e-mail ([etik@er-kim.com.tr](mailto:etik@er-kim.com.tr)), website (<https://www.er-kim.com>) or Ethics Hotline (+90 212 401 59 19).

#### **APPROPRIATE USE OF THE ETHICS HOTLINE**

It should be noted that the Ethics Hotline is not an emergency service. This line should not be used to report incidents that pose an immediate threat to life or property. Notifications made through this service may not receive an immediate response. If immediate assistance is required, local authorities and Company representatives should be contacted.

#### **5. YOUR RESPONSIBILITIES**

All employees are responsible for the daily monitoring of this policy and compliance with its content. Members of the Board of Directors, managers and those authorized to sign on behalf of ER-KIM are responsible for fulfilling the legal and ethical obligations of this policy and for ensuring that those under their control comply with this policy. Violation of this Policy may result in various sanctions, including termination of employment.

You must ensure that you read, understand, are trained on the issues contained herein and comply with this policy. In this regard, you are expected to raise any suspicions of danger or wrongdoing.

It is the responsibility of all ER-KIM employees and Third Parties acting on behalf of ER-KIM to prevent, detect and report bribery and other forms of corruption. ER-KIM Members are obliged to prevent any



activity that may constitute or potentially constitute a violation of the ER-KIM Code of Business Ethics and related Policies.

#### **6. RECORD KEEPING**

Notifications made under this policy and records regarding the process carried out are recorded by the Legal and Compliance Department.

#### **7. PROTECTION**

Retaliation of any kind against a person who in good faith reports a suspected violation of law, Company policies or industry rules, or against someone who assists in investigations, is itself a serious violation of the Code of Business Conduct and the Anti-Retaliation Policy. ER-KIM will not tolerate such actions and such actions must be reported immediately. If you believe you have been subjected to such treatment, you should immediately report it to a member of the local management team with whom you are most comfortable in accordance with our Anti-Retaliation Policy. If the matter is not resolved, you should report it separately to the Legal and Compliance Department.

#### **8. TRAINING AND COMMUNICATION**

The Legal and Compliance Department is responsible for ensuring that this policy is understood and that adequate and regular training is provided on this topic. Training on this policy forms part of the orientation period for all new employees. Existing employees should receive regular training on how to implement and comply with this policy.

Those at all levels of management are responsible for ensuring that this policy is understood and that adequate and regular training is provided.

In accordance with the principle of continuous improvement, ER-KIM will be in constant communication and discussion with its employees in order to understand this Policy and to develop and improve it in the future.

#### **9. MONITORING AND REVIEW**

The Legal and Compliance Department will measure and regularly monitor and review the effectiveness, appropriateness and adequacy of this policy. Any improvements to be identified will be made as soon as possible. This policy does not constitute a part of the employee's employment contract and may be changed by ER-KIM at any time.


**ANNEX 1 DOCUMENT HISTORY AND VERSION CONTROL RECORD**

<b>Document Name</b>	Notification, Consultation and Whistleblowing Policy
<b>Author</b>	Bilge KIYAK, Legal and Compliance Manager
<b>Approved by</b>	CEM ZORLULAR, Chairman of the Board
<b>Published by</b>	Ahu ÖZGÜR, Quality Manager
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<b>Version No</b>	<b>Version Date</b>	<b>Amendment details</b>
00	November 5, 2019	Notification, Consultation and Whistleblowing Policy First Edition
01	December 23, 2019	Changes in title and preparing party
00	May 9, 2022	The numbering system changed in accordance with DK-2022-0001. The Notification, Consultation and Whistleblowing Policy was revised to cover all ER-KIM Affiliates by simplifying its language.