



ER-KIM GLOBAL POLICY

ANTI-RETALIATION POLICY

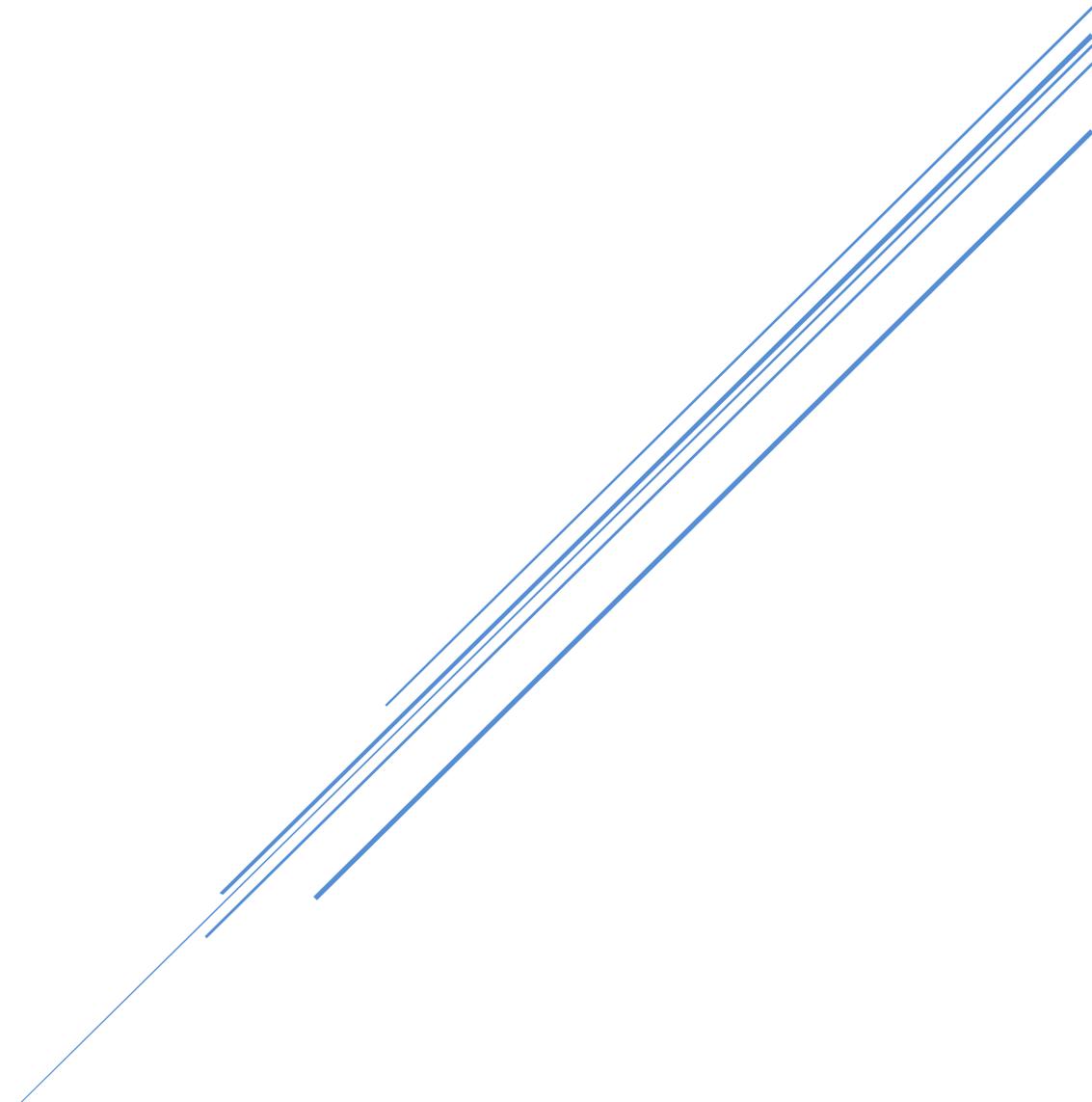




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1. INTRODUCTION

It is our policy to exhibit honest, ethical and legal behavior by adhering to the Principles of Business Ethics and related Policies and with the same ethical perspective. Company activities are carried out in full compliance with our professional and ethical business principles and local legislation.

The Anti-Retaliation Policy is the framework text that aims to prevent any material or moral victimization that may occur after reporting any situation that may be in violation of legal legislation, ER-KIM¹ Code of Business Ethics and applicable policies. ER-KIM sets out the mechanisms that prevent people who report a corruption, misconduct, non-compliance or irregularity within ER-KIM from suffering material or immaterial damage due to this report. ER-KIM does not condone retaliation for any reason and this Policy is a commitment to take the disciplinary action provided for by the disciplinary processes if a case of retaliation occurs.

The purpose of this policy is:

- a) To reassure all employees to report instances of non-compliance publicly or anonymously, and to report cases that they see or suspect to be untrue, unethical or inappropriate,
- b) To prevent the whistleblowing employee from being harmed or retaliated against and ensures that the retaliating employee receives the necessary punishment.

2. SCOPE AND APPLICABILITY

This policy applies to all Members² or third parties connected with ER-KIM in any business relationship.

ER-KIM is committed to providing its employees with the safest working environment and is committed to protecting any employee or third party who reports an actual or potential violation of this Policy and legal legislation, ER-KIM Business Ethics Principles and Policies against any retaliation.

Retaliation is the harm suffered by a whistleblower following a whistleblowing incident. This retaliation may cause material or moral victimization of the person who reported/whistleblower and Er-Kim tries to prevent any such victimization and may prevent reporting for similar situations in the future. With this Policy, ER-KIM undertakes to apply the necessary administrative and criminal sanctions in case of any retaliation.

¹ "Er-Kim" or the "Company" 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.

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



3. GENERAL RULES

ER-KIM undertakes to keep the identity of whistleblowers confidential if requested in the Notification, Consultation and Whistleblowing Policy. This principle of confidentiality is a measure to protect the whistleblower against the possibility of retaliation.

At the same time, it undertakes that the whistleblower will not be penalized in any way for whistleblowing and that it will protect the whistleblower against retaliation for whistleblowing.

CONFIDENTIALITY OF THE WHISTLEBLOWER'S IDENTITY

Since the notifications/reports made within the scope of the Notification, Consultation and Whistleblowing Policy may be related to sensitive issues with a high degree of confidentiality, and in order to prevent any reservations in case the person making the notification/notification is an employee, it is possible to withhold the identity of the person when making the notification/notification. This is because, without the possibility of anonymity, there may be situations in which no further information can be obtained from the reporting/whistleblowing person, which would hamper the conduct of a proper investigation.

Even if the person making the notification/report makes a report anonymously, ER-KIM will keep the identity of this person confidential as long as the investigation proceeds efficiently. If the whistleblower's statement is required as part of the investigation, the whistleblower may request that an outside counsel (lawyer or trade union official) accompany him or her in the investigation. This legal accompaniment can also assist the whistleblower in the event of retaliation at a later stage.

4. WHAT TO DO IN CASE OF RETALIATION

A whistleblower should notify the Legal and Compliance Department if the whistleblower believes that he or she has been victimized or harmed by someone within ER-KIM as a result of making a public whistleblower or assisting in an investigation under this Policy. In such a case, ER-KIM will protect the employee and investigate the possibility of retaliation. Employees who are proven to have retaliated will be disciplined according to the Disciplinary procedures.

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

All investigations conducted under this Policy are recorded in writing by the Legal and Compliance Department.

7. VOICING A PROBLEM

ER-KIM offers its support in raising any issues related to misconduct as soon as possible.

Such cases can be communicated to the following departments:

- Your First Supervisor,
- Your Department Head,
- Legal and Compliance Department

Applications can be made to the Company's Legal and Compliance Department at etik@er-kim.com.tr, as described in the Notification, Consultation and Whistleblowing Policy and Procedure. Alternatively, it can be reported anonymously through the Ethics Hotline ([+90 212 401 59 19](tel:+902124015919)).

8. PROTECTION

At ER-KIM, our aim is to ensure that no one will be subjected to detrimental treatment as a result of refusing to be a party to bribery or corruption or responsibly reporting actual or potential bribery or corruption. Harmful treatment includes dismissal, disciplinary action, threats or negative behavior related to raising an issue. 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.

9. 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.



10. 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. All employees are responsible for the success of this policy and are therefore expected to raise any suspicions of danger or misconduct. 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

Document Name	Anti-Retaliation Policy
Author	Bilge KIYAK, Legal and Compliance Manager
Approved by	CEM ZORLULAR, Chairman of the Board
Published by	Ahu ÖZGÜR, Quality Manager
Approval Date	May 9, 2022
Review Date	-
Review period	2 years
Next Revision Date	May, 2024

Version No	Version Date	Amendment details
00	November 5, 2019	Anti-Retaliation Policy First Spelling
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 language of the Anti-Retaliation Policy was simplified and revised to cover all ER-KIM Affiliates.