



# ANTI- RETALIATION POLICY

Publication Date: 09.11.2021

# **ANTI-RETALIATION POLICY**

## **1.Purpose and Scope of the Policy**

This Anti-Retaliation Policy ("Policy") aims, following any matter reported to be in violation of particularly Enerjisa Code of Conduct and all other company policies within Enerjisa, to prevent grievance of the whistleblowers, to ensure the continuity of communication between the employees and Enetik hot-line and to establish the trust of the employees to Enetik hot-line. This Policy covers Enerjisa Enerji A.Ş. and all its subsidiaries.

## **2.Anti-Retaliation within Enerjisa**

Pursuant to this Policy;

- Employees who honestly and in good faith report a violation and/or suspected violation and/or request of information regarding Enerjisa Code of Conduct shall not be subject to any retaliation (including but not limited to discrimination, suspension, loss of rights, downgrading, prevention of promotion, threats or harassment).
- No action can be taken against the whistleblower, even if it cannot be proven that any illegal behavior or violation of a rule occurred as a result of the employee(s) reporting their reasonable or justified concerns. The Anti-Retaliation Policy is the assurance that employees will not face any retaliation, pressure or sanctions, if they report suspected cases.
- Within the framework of the confidentiality principle set out in Enerjisa Code of Conduct, both the content of the notification and the personal data of the whistleblower are kept and evaluated with the highest confidentiality as a precaution to protect the whistleblower against the possibility of retaliation. Even if the whistleblower makes a report non-anonymous; it will be kept confidential unless duly requested by the judicial and administrative authorities.

## **3.Reporting**

If the whistleblower believes that he/she has been retaliated by someone within the Company for making a report, he/she should report this immediately. The notification regarding retaliation can be made via Enetik hot-line in a confidential manner as well as to the Corporate Compliance Officer.

## **4.Measures and Actions to be Taken**

In case of any retaliation case, the Company takes the most appropriate measures for the protection of the employee's rights without delay, through the People and Culture Department. An examination and/or investigation is initiated by the Company through the Internal Audit Department regarding the possibility of retaliation. If retaliation is detected, necessary corrective measures are taken to eliminate the grievance of the whistleblower. Necessary sanctions are applied against those who retaliate.

In case it is objectively determined that the notifications are made in bad faith, a disciplinary investigation is initiated in terms of abuse of right and violation of honesty principles in terms of the employee(s) who made the notification.

This Policy is an integral part of the Enerjisa Code of Conduct.

This Policy has been approved and entered into force by the Board of Directors. This Policy is published on the Company Investor Relations website in two languages, Turkish and English.