

## KORDSA TEKNİK TEKSTİL A.Ş. WHISTLEBLOWING PROCEDURE

### 1. PURPOSE

Kordsa Teknik Tekstil A.Ş. ("Kordsa") has published this Whistleblowing Procedure ("Procedure") in an aim to promote its commitment to oversee business in an ethically suitable manner. This Procedure, being a component part of Kordsa Code of Business Ethics, is intended to set out the principles of whistleblowing, to establish the whistleblowing process within Kordsa, to clarify how to raise a concern and what types of concerns can be raised and to provide guidance on the protection of whistleblowers. Kordsa recognizes the primordial role whistleblowers play in determining unethical conduct and encourages speak up culture within the company.

### 2. SCOPE

This Procedure applies to Kordsa and all of its subsidiaries and covers all present and former employees and parties that have business relationship with Kordsa including current companies from which Kordsa outsources good and services and their employees, suppliers, subcontractors, contractors, consultants.

### 3. DEFINITION

**Whistleblowing** is an act of disclosure and reporting concerns and behaviors that are considered to be potentially or directly in conflict with ethical values, internal procedures, legal and/or regulatory obligations within and in relation to the organization. An individual reporting activities that are harmful to company culture, values and eventually to the public interest and who is under protection, is called a **whistleblower**.

### 4. VALID WHISTLEBLOWING CONCERNS

The Procedure gives an opportunity to speak freely about (potentially) unethical conduct, raising concerns and question/discuss all related issues about such concerns. It is possible to typically report on a variety of different issues regarding corrupt, fraudulent or illegal activities. A list of non-exhaustive examples of concerns can be found below:

- Corruption, bribery
- Money laundering, theft, fraud,
- Anticompetitive practices,
- Child labor, forced labor, human trafficking,
- Environmental damages,
- Public health and/or product safety
- Diversity, discrimination, harassment,
- Breach of confidentiality and privacy,
- Inappropriate use of Kordsa assets,
- Conflicts of interest,
- External stakeholder human rights issues.

## 5. DEDICATED LINES FOR REPORTING

Kordsa employees are expected and have a responsibility to report the ethical and legal violations orally or in writing. It is possible to raise concerns through Kordsa Ethics Line hosted by an independent third party (Navex Global) and accessible by phone and web and/or openly discuss any unethical and inappropriate behaviour with their managers, or the Global/Local Ethics Compliance Officer and/or the Head of Legal and Compliance.

Kordsa Ethics Line is a confidential tool which is available for both external and internal reporting. The relevant toll-free phone numbers and web addresses used for this purpose are provided below:

<b>Ethics Hotline</b>																
<b>Online</b>	:	<a href="http://kordsa.ethicspoint.com">kordsa.ethicspoint.com</a> (desktop version) <a href="http://kordsa-mobile.ethicspoint.com">kordsa-mobile.ethicspoint.com</a> (mobile version)														
<b>Toll-Free Phone Numbers by Country</b>	:	<table style="width: 100%; border: none;"> <tr> <td style="padding-right: 20px;">Indonesia</td> <td>0800-140-1916</td> </tr> <tr> <td>Thailand</td> <td>1800-014-755</td> </tr> <tr> <td>Turkey</td> <td>0800-621-2461</td> </tr> <tr> <td>USA</td> <td>800-725-927</td> </tr> <tr> <td>Brazil</td> <td>0800-000-0551</td> </tr> <tr> <td>Italy</td> <td>800-725-927</td> </tr> <tr> <td>Germany</td> <td>0800 1822656</td> </tr> </table>	Indonesia	0800-140-1916	Thailand	1800-014-755	Turkey	0800-621-2461	USA	800-725-927	Brazil	0800-000-0551	Italy	800-725-927	Germany	0800 1822656
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## 6. CONFIDENTIALITY AND ANONYMOUS REPORTING

Kordsa manages its reporting channels in a confidential manner by respecting the privacy of whistleblowers and provides opportunity for anonymous reporting where desired if this is allowed by the relevant national law. The identity of the whistleblower is protected. It is possible for the whistleblowers to file a report anonymously while filing such a report through the abovementioned websites. As for the reports filed in this way, the whistleblower is informed about the investigation without identification and, if necessary, additional information can be requested from the whistleblower. As for the complaints submitted directly to the Ethics Board, the identity of the whistleblower shall only be revealed to those dealing with the relevant report and conducting the investigation, in other words, authorized staff members unless otherwise required and/or is necessary by law such as subsequent judicial proceedings.

## 7. NON-RETALIATION

Kordsa does not tolerate retaliation against a whistleblower who cooperates with an investigation, raises a concern, or reports suspected misconduct in good faith. Raising a concern in "good faith" means being sincere in providing honest and accurate information, even if it is later found out the reporter was mistaken. Kordsa takes retaliation claims very seriously – anyone found to have committed a retaliatory act will be subject to disciplinary action, including termination of

employment and/or business contracts. Anyone found to have filed an ethics report without any justified suspicion and in bad faith just to wear someone down may also be subject to disciplinary action. All kinds of complaints are evaluated and concluded as soon as possible. Complaints for which there is no sufficient evidence or suspicion may be closed without additional action as a result of the investigation.

## **8. COMPLIANCE, SURVEILLANCE, SUPERVISION AND REPORTING**

In case of non-compliance with this Procedure and other relevant rules, Ethics Board is responsible for the identification of notification, inspection and sanction mechanisms.

In the event of detection of situations and inappropriate behavior in contradiction with this Procedure, penal sanctions may be applied in accordance with the provisions of the relevant legislation in the countries in which we operate.

The feedbacks related to the Procedure and possible Procedure infringements and inconsistencies are informed via [etik@kordsa.com](mailto:etik@kordsa.com) and/or whistleblowing mechanisms described above.

## **9. REVIEW**

Whistleblowing Procedure is revised periodically by Ethics Board and the coordination of Procedure is under the responsibility of Global Legal and Compliance Department. In addition to this, all Kordsa directors are responsible for managing the business processes in respective administrative and commercial functions in compliance with the Procedure.