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WHISTLEBLOWING and COMPLAINT MANAGEMENT POLICY



1.0 PURPOSE

The purpose of this policy is to encourage the reporting of activities and transactions within Naturel Holding and its subsidiaries (Company) that are in violation of ethical principles, UNGC principles, applicable laws and regulations, the Capital Markets Board (CMB) regulations, and Borsa Istanbul (BIST) principles and rules; and to ensure that such reports and complaints are addressed effectively, confidentially, fairly, and in a timely manner.

2.0 SCOPE

This policy applies to the following stakeholders within Naturel Holding and its publicly traded subsidiaries:

- All employees
- Members of the Board of Directors
- Shareholders
- Suppliers
- Business partners
- Customers
- All other stakeholders

3.0 DEFINITIONS

- Whistleblowing: A report made through designated company channels regarding unethical, illegal, or improper conduct.
- Complaint: A report submitted by an individual seeking resolution for a situation they are directly affected by or dissatisfied with.
- Whistle-blower: The individual who submits the report. This person may remain anonymous.
- Ethical Violation: Includes all unethical or illegal acts such as bribery, corruption, conflict of interest, insider trading, financial misreporting, etc.

4.0 PRINCIPLES

4.1 Confidentiality and Anonymity

All reports are handled with strict confidentiality. The identity of the whistle-blower will not be disclosed without their explicit consent. Anonymous reports will also be considered.

4.2 Protection from Retaliation

Individuals who report in good faith will not face disciplinary action, dismissal, or discrimination as a result of their report.

4.3 Transparency and Accountability

All processes are documented and, if necessary, may be reported to independent auditors or relevant authorities.

Prepared by:	Controlled by:	Approved by:
QUALITY MANAGEMENT	INTERNAL AUDIT	CHIEF EXECUTIVE OFFICER
DEMET DİKMEN	VOLKAN AKSAKAL	TOLGAY BENDERLİ

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4.4 Impartiality and Objectivity

Each report is handled independently, professionally, and impartially. The evaluation process is free from conflicts of interest.

4.5 Timely Evaluation

All reports are investigated within a reasonable period and necessary actions are taken promptly.

4.6 Record-Keeping

All reports and complaints are recorded in corporate systems and managed in a traceable manner.

4.7 False or Malicious Reporting

Unfounded or malicious reports are considered abuse of the whistleblowing system and may lead to disciplinary or legal action against the individual.

5.0 REPORTABLE ISSUES

Reports may include, but are not limited to, the following issues:

- Fraud in financial reporting
- Illegal payments (bribery, corruption)
- Insider trading
- Conflicts of interest
- Violation of shareholder rights
- Breach of ethical standards
- Harassment, mobbing, or discrimination
- Occupational health and safety violations
- Employment of child labor
- Violations of personal data protection laws (KVKK)

6.0 REPORTING CHANNEL

Reports can be submitted through the following methods:

- Email: etikhat@naturelholding.com.tr
- Whistle-blower Hotline: +90 (312) 467 18 33
- Postal Mail or In Person: Kızılırmak Mahallesi, 1450 Sokak, ATM Plaza B Blok, No:1/68, Floor 14, Çukurambar / Çankaya / Ankara
- CİMER (Presidency Communication Center)

Anonymous reports are accepted and encouraged. However, providing contact information is recommended to ensure the process can be managed effectively.

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7.0 REVIEW AND INVESTIGATION

The whistleblowing and complaint handling process consists of the following stages;

- Reports received by the Holding are forwarded to the Ethics Committee.
- The Ethics Committee reviews the report within 5 business days and conducts a preliminary assessment.
- Based on the severity of the report, the Ethics Committee may notify the Audit Committee of the Board of Directors.
- If necessary, the Ethics Committee involves the Internal Audit Department or initiates an independent audit process.
- Where required, the Ethics Committee informs the relevant legal authorities.
- Appropriate actions are taken and documented based on the outcome of the process.
- If the identity of the whistle-blower is known, they are informed about the process.

8.0 LEGAL COMPLIANCE AND REPORTING

This policy has been prepared in compliance with the following laws and regulations:

- Turkish Commercial Code (TCC)
- Capital Markets Law and CMB Communiqués
- Borsa Istanbul Corporate Governance Principles
- Law on the Protection of Personal Data (KVKK)
- International Ethical Standards (e.g., OECD, UNGC)

9.0 ENFORCEMENT AND REVIEW

This policy becomes effective as of the date of publication. It is reviewed at least once a year by the Ethics Committee and, if necessary, revised and republished.

10.0 REVISION HISTORY

Revision No	Rev. Date	Rev. Titles	Explanations
0.0	10.10.2025	--	Initial release

Prepared by:	Controlled by:	Approved by:
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