



PASINEX ARAMA VE MADENCILIK A.S.

CG-205 WHISTLEBLOWING POLICY

SECTION ONE

Purpose

Article 1 – Purpose

The purpose of this Policy is to establish the principles and procedures governing the secure, confidential, impartial and effective reporting, assessment, investigation and resolution of conduct, transactions or practices that are considered to be inconsistent with ethical principles, applicable legislation, the Company's policies and procedures or its corporate values within **Pasinex Exploration and Mining Inc.**

The Company supports a culture of whistleblowing and encourages good faith reporting in accordance with the principles of:

- a) integrity;
- b) transparency;
- c) accountability;
- d) ethical governance;
- e) good corporate governance; and
- f) compliance with the law.

The Company is committed to protecting the confidentiality of the identity of whistleblowers, ensuring that reports are assessed impartially, and protecting individuals who make reports in good faith against any form of retaliation, discrimination, pressure or adverse treatment.

This Policy aims to strengthen the Company's ethical culture, facilitate the early identification of corporate risks, enhance compliance with legal and ethical standards, and safeguard the Company's corporate reputation.

Article 2 – Scope

This Policy applies to:

- a) members of the Board of Directors;

- b) members of Board Committees;
- c) the Chief Executive Officer and senior executives;
- d) all employees;
- e) interns and temporary personnel;
- f) advisers;
- g) representatives;
- h) contractors and subcontractors;
- i) suppliers;
- j) business partners; and
- k) other natural and legal persons acting on behalf of the Company.

To the extent appropriate to the nature of its activities, the Company also supports customers, investors, shareholders, local communities and other relevant external stakeholders in submitting whistleblowing reports under this Policy.

The Company encourages its business partners and affiliates to establish whistleblowing mechanisms that are consistent with the fundamental principles of this Policy.

Article 3 – Legal Basis

This Policy has been prepared on the basis of:

- the Turkish Commercial Code;
- the Turkish Criminal Code;
- the Labour Law;
- the Law on the Protection of Personal Data; and
- other applicable national legislation.

The following Company policies and governance documents shall also be taken into consideration in the implementation of this Policy:

- **CG-202 Code of Ethics and Business Conduct Policy;**
- **CG-203 Anti-Bribery and Anti-Corruption Policy;**
- **CG-204 Conflict of Interest Policy;** and
- other relevant corporate governance, compliance, disciplinary, human resources, information security policies and procedures.

In interpreting and implementing this Policy, due consideration shall also be given to internationally recognised corporate governance and whistleblowing standards and good practices in addition to the

applicable legislation. In particular, the following shall, where appropriate, be taken into consideration:

- **OECD G20 Principles of Corporate Governance (2023);**
- **OECD Guidelines for Responsible Business Conduct;**
- **ISO 37002 – Whistleblowing Management Systems;**
- **ISO 37301 – Compliance Management Systems;**
- **ISO 37000 – Governance of Organizations;**
- **United Nations Guiding Principles on Business and Human Rights (UNGPs); and**
- **ICMM Mining Principles.**

Where differences exist between national legislation and internationally recognised good practices, the approach providing the higher standard of ethical conduct, transparency and corporate governance shall be adopted, without prejudice to any mandatory provisions of applicable law.

SECTION TWO

Definitions

Article 4 – Definitions

For the purposes of this Policy, the following definitions shall apply:

Whistleblowing Report: A report made in good faith through the authorised reporting channels concerning conduct, actions, omissions or practices that are reasonably believed to be inconsistent with ethical principles, applicable legislation, the Company's policies and procedures or its corporate values, or where reporting is considered to be in the public interest or the legitimate interests of the Company.

Whistleblower: The natural person who submits a whistleblowing report under this Policy.

Reported Person: The natural or legal person who is the subject of a whistleblowing report and in respect of whom an assessment or investigation is conducted.

Whistleblowing Channel: The communication channels and reporting mechanisms established by the Company to receive whistleblowing reports securely, confidentially and appropriately.

Investigation: The process following receipt of a whistleblowing report, including assessment of the report, preliminary review, investigation, collection of evidence and any other investigative activities considered necessary.

Retaliation: Any direct or indirect adverse action or conduct taken against an individual as a result of submitting a whistleblowing report, participating in an investigation or providing information, including dismissal, reassignment, reduction of salary or benefits, discrimination, harassment, intimidation, pressure, threats, exclusion, obstruction of career development or any comparable adverse treatment.

Good Faith Report: A report made where the whistleblower honestly believes, based on the information available and their reasonable assessment at the time the report is made, that the

reported information is true. The mere fact that an investigation does not substantiate the report shall not, of itself, render the report a bad faith report.

Anonymous Report: A whistleblowing report submitted without disclosing the identity of the whistleblower.

Confidentiality: The principle that the identity of the whistleblower, the reported person, witnesses, and all information and documentation obtained during the investigation process shall be accessible only to persons authorised by virtue of their duties.

SECTION THREE

Fundamental Principles

Article 5 – Principle of Trust

The Company is committed to ensuring that its whistleblowing mechanism operates in a reliable, accessible, independent, impartial and effective manner.

The whistleblowing system shall be designed and operated on the basis that:

- a) employees and other relevant persons are able to submit whistleblowing reports without fear of pressure, hesitation or retaliation;
- b) reports are received through secure reporting channels;
- c) reports are assessed impartially, objectively and in a timely manner; and
- d) the reporting process is conducted fairly and with due respect for the rights of all persons concerned.

The Company recognises that confidence in the whistleblowing mechanism is a fundamental element of its ethical culture and shall regularly review the effectiveness of that mechanism.

Article 6 – Good Faith

Whistleblowing reports submitted under this Policy shall be made in good faith.

A good faith report is one made where the whistleblower honestly believes, based on the information available and their reasonable assessment at the time of reporting, that the reported information is true.

Where an investigation does not substantiate the allegations contained in a report or where the allegations cannot be supported by sufficient evidence, this fact alone shall not constitute evidence of bad faith, and the whistleblower shall continue to benefit from the protections provided under this Policy.

However, the following shall not be protected under this Policy and shall be dealt with in accordance with the applicable legislation and the Company's policies and procedures:

- a) knowingly submitting false reports;

b) submitting false information or fabricated documentation; and

c) making reports in bad faith for reasons of personal animosity, personal gain or with the intention of causing harm to others.

While encouraging good faith reporting, the Company shall also implement appropriate measures to prevent misuse of the whistleblowing mechanism.

Article 7 – Confidentiality and Information Security

The Company is committed to protecting the confidentiality of all information and documentation obtained through the whistleblowing process and to ensuring that such information is accessible only to authorised persons who require access by virtue of their duties.

The identity of the whistleblower shall not be disclosed to any person except:

a) where disclosure is required by law;

b) where the whistleblower has given explicit consent;

c) where disclosure is necessary for the purposes of a judicial or administrative investigation; or

d) to the extent strictly necessary for the conduct of the investigation.

The same principle of confidentiality shall apply to the reported person, witnesses and all information and documentation obtained during the investigation process.

The Company shall implement appropriate technical and administrative measures to protect information and documentation relating to whistleblowing reports and shall safeguard records against unauthorised access, alteration, disclosure, loss or destruction.

All persons involved in the whistleblowing process shall be under an obligation to preserve the confidentiality of any information and documentation obtained in the course of their duties.

SECTION FOUR

Matters Subject to Whistleblowing Reports

Article 8 – Matters Covered by Whistleblowing Reports

The following matters, where appropriate, may fall within the scope of whistleblowing where they are reasonably considered to be inconsistent with ethical principles, applicable legislation, the Company's policies and procedures or its corporate values, or are considered to present a significant risk:

a) bribery, corruption, extortion, embezzlement, abuse of office and similar acts of corruption;

b) fraud, forgery, fraudulent transactions and financial irregularities;

- c) irregularities relating to accounting, financial reporting, record-keeping or audit processes;
- d) conflicts of interest and breaches of the obligations established under this Policy;
- e) serious deficiencies in internal control, risk management or corporate governance processes;
- f) breaches relating to information security, cybersecurity or the protection of personal data;
- g) the unlawful or unauthorised use or disclosure of trade secrets, confidential information or intellectual property rights contrary to applicable law or the Company's governance documents;
- h) misuse of the Company's assets, financial resources or other corporate resources;
- i) practices contrary to human rights, employees' rights or fundamental principles relating to working life;
- j) breaches of occupational health and safety requirements or serious safety risks;
- k) conduct contrary to environmental legislation, environmental obligations or sustainability principles;
- l) discrimination, psychological harassment (mobbing), sexual harassment, violence, threats or similar inappropriate conduct;
- m) breaches of ethical principles, abuse of office or misuse of authority for personal benefit;
- n) other serious misconduct capable of causing significant harm to the Company's reputation, financial position, operations or stakeholders; and
- o) serious or systematic breaches of applicable legislation or the Company's policies and procedures.

The matters listed in this Article are not exhaustive, and any other conduct that may reasonably be considered to constitute a breach of ethical principles or applicable law may also be reported under this Policy.

Where there is uncertainty as to whether a matter falls within the scope of whistleblowing, such uncertainty shall not prevent a report from being submitted. The relevant report shall be subject to a preliminary assessment by the authorised functions and handled through the appropriate process.

SECTION FIVE

Reporting Channels

Article 9 – Reporting Channels

The Company shall establish and maintain appropriate reporting channels to ensure that whistleblowing reports are received securely, confidentially, accessibly and effectively, taking into account the nature of its activities and organisational structure.

Where appropriate, the following reporting channels may be used:

- a) the **Ethics Reporting Hotline**;
- b) a dedicated electronic mail address established for whistleblowing reports;
- c) a secure online whistleblowing platform;
- d) written submissions;
- e) the **Legal and Compliance Function**;
- f) the **Human Resources Function**; and
- g) such other secure communication channels as may be designated by the Board of Directors.

Reporting channels shall be designed and operated so as to be:

- a) easily accessible;
- b) secure;
- c) capable of preserving confidentiality;
- d) protected against unauthorised access; and
- e) capable, where appropriate, of receiving anonymous reports.

The Company shall establish processes to ensure that whistleblowing reports are promptly assessed by appropriately authorised persons. Depending on the nature of the report, the principles of segregation of duties and impartiality shall be observed in allocating responsibilities among the relevant functions.

Article 10 – Anonymous Reports

The Company may accept and, where appropriate, assess anonymous reports in order to enhance the effectiveness of its whistleblowing mechanism.

To facilitate the effective assessment of anonymous reports, the report should, to the greatest extent possible, include:

- a) the nature of the incident;
- b) the relevant individuals or organisational units;
- c) the date of the incident or the relevant period during which it occurred; and
- d) where available, any information, documentation or other supporting evidence.

The report is expected, to the greatest extent possible, to include such information.

The fact that a report is submitted anonymously shall not, in itself, constitute grounds for rejecting the report or treating it as insignificant. Anonymous reports shall be assessed objectively on the basis of the information and evidence they contain.

The Company shall not automatically impose disciplinary measures against any person solely on the basis of an anonymous report. Where considered appropriate, preliminary assessment, verification and investigation procedures shall be conducted, and disciplinary or other actions shall be considered only in light of the findings obtained.

The anonymous reporting mechanism shall not be used in a manner that encourages malicious or unfounded reports. Where such reports are identified, the appropriate procedures shall be followed.

SECTION SIX

Receipt and Assessment of Reports

Article 11 – Recording of Reports

All whistleblowing reports received by the Company shall be recorded and managed within a traceable system under appropriate security, confidentiality and information security measures.

Where appropriate, the following information shall be recorded for each whistleblowing report:

- a) the date on which the report was received;
- b) the reporting method;
- c) the subject matter and scope of the report;
- d) the priority and risk assessment of the report;
- e) the outcome of the preliminary assessment;
- f) the investigation or inquiry conducted;
- g) decisions taken;
- h) corrective and preventive actions implemented; and
- i) the completion date and outcome of the investigation.

Whistleblowing records shall be retained in accordance with the applicable legislation and the Company's policies and procedures relating to document management, information security and the protection of personal data. Access to such records shall be restricted to persons authorised by virtue of their duties.

Article 12 – Preliminary Assessment

Each whistleblowing report shall, as soon as reasonably practicable, be subject to a preliminary assessment to determine its scope, seriousness, level of risk, whether it contains sufficient information and whether it falls within the scope of this Policy.

Following the preliminary assessment, one or more of the following decisions may be taken:

- a) initiating a detailed review or investigation;
- b) requesting additional information or documentation from the whistleblower or other relevant persons;
- c) referring the matter to the competent internal functions or other appropriate processes;
- d) determining that the report does not require action under this Policy; and
- e) implementing immediate risk mitigation measures where considered appropriate.

The preliminary assessment shall be conducted on the basis of objective criteria. The decisions taken and the reasons supporting those decisions shall be appropriately documented.

Where the preliminary assessment concludes that the matter would be more appropriately addressed under another Company policy or procedure, the report shall be referred to the appropriate function, and such referral shall be documented.

Article 13 – Principle of Impartial and Independent Investigation

Whistleblowing reports shall be assessed in accordance with the principles of impartiality, independence, objectivity, fairness and confidentiality.

Any person responsible for conducting an investigation who has an actual, potential or perceived conflict of interest in relation to the reported matter shall promptly disclose such conflict and shall not participate in the investigation.

Where considered appropriate, the Company may engage independent experts, legal advisers, audit firms or other external advisers in order to strengthen the independence and expertise of the investigation.

Persons involved in the investigation process shall be required to:

- a) act impartially;
- b) maintain the confidentiality of all information and documentation obtained;
- c) conduct the investigation without unnecessary delay; and
- d) respect the rights of the persons concerned and the principles of procedural fairness.

No person shall seek to influence the outcome of a whistleblowing report for personal benefit or otherwise improperly interfere with the investigation process.

SECTION SEVEN

Review and Investigation Process

Article 14 – Review and Investigation Process

Reviews and investigations relating to whistleblowing reports shall be conducted in accordance with the principles of legality, confidentiality, impartiality, independence, objectivity, proportionality, procedural fairness and completion within a reasonable period.

During the investigation process:

- a) access shall be limited to information and documentation relevant to the subject matter of the investigation;
- b) personal data, trade secrets and other confidential information shall be protected in accordance with the applicable legislation and the Company's policies and procedures;
- c) information and documentation obtained shall be used solely for the purposes of the investigation;
- d) appropriate care shall be taken to preserve the integrity of evidence and ensure its secure retention; and
- e) the rights of the persons concerned and the presumption of innocence shall be respected throughout the investigation.

Where necessary, the Company may implement temporary risk mitigation or protective measures to ensure the effective conduct of the investigation. Such measures shall not constitute disciplinary sanctions before the investigation has been completed.

Article 15 – Right to be Heard and Procedural Fairness

The person who is the subject of an investigation shall, at an appropriate stage that does not compromise the effectiveness of the investigation or the preservation of evidence, be informed of the allegations and afforded an opportunity to provide an explanation or present a defence.

In exercising the right to be heard:

- a) the views and explanations of the relevant person shall be assessed objectively;
- b) information and documentation relating to the defence shall be included in the investigation file;
- c) the relevant person's personal rights, reputation and confidentiality shall be protected; and
- d) all parties shall be treated fairly and equally throughout the investigation process.

The right to be heard may, where appropriate, be exercised in writing or orally and shall be appropriately documented.

Article 16 – Resolution and Measures to Be Taken

Following completion of the investigation, the information and findings obtained shall be evaluated and, where appropriate, one or more of the following decisions may be taken:

- a) determining that no ethical or legal violation has occurred;
- b) recommending improvements to processes, internal controls or policies and procedures;
- c) implementing corrective or preventive actions;
- d) initiating disciplinary proceedings;
- e) commencing legal, administrative or criminal proceedings or providing support to such proceedings;
- f) considering whether notification should be made to the relevant public authorities; and
- g) implementing organisational measures to prevent the recurrence of similar violations.

The decisions taken and the reasons supporting those decisions shall be appropriately documented. Corrective and preventive actions approved for implementation shall, where appropriate, be monitored and their completion tracked.

Investigation outcomes shall, where appropriate, be evaluated to promote the development of the Company's ethical culture, strengthen its internal control system and facilitate organisational learning aimed at preventing similar risks.

SECTION EIGHT

Protection Against Retaliation

Article 17 – Principle of Protection Against Retaliation

The Company is committed to ensuring that individuals who, in good faith, submit whistleblowing reports, support the submission of such reports, provide information or documentation during an investigation, act as witnesses or otherwise contribute to the investigation process are not subjected to any form of retaliation.

Accordingly, no direct or indirect retaliatory action or conduct shall be permitted, including, without limitation:

- a) unjust or unlawful termination of employment;
- b) adverse changes to duties, title, workplace or responsibilities;
- c) unjustified reductions in salary, bonuses, benefits or other financial entitlements;
- d) malicious interference with performance evaluations, promotion, training or career development processes;

- e) psychological harassment (mobbing), exclusion, pressure, threats or discriminatory treatment; or
- f) deterioration of working conditions or any comparable adverse treatment.

The prohibition against retaliation shall apply where a report has been made in good faith, regardless of whether the reported allegations are ultimately substantiated.

Any allegation of retaliation shall be treated as a priority and, where considered appropriate, shall be investigated separately under this Policy.

Article 18 – Protective Measures

The Company shall implement appropriate administrative, technical and organisational measures to safeguard the security, rights and legitimate interests of individuals who submit whistleblowing reports or contribute to an investigation.

Depending on the nature of the risk, one or more of the following measures may be implemented to protect the rights of the relevant individual:

- a) temporary changes to the allocation of duties or reporting relationships;
- b) temporary adjustments to working arrangements or place of work, provided that such adjustments do not adversely affect the rights of the relevant individual;
- c) enhanced protection of the confidentiality of identity information and personal data;
- d) restricting access to information and documentation on the basis of authorised access; and
- e) implementing such other protective measures as may be considered appropriate.

Protective measures shall be implemented in accordance with the principle of proportionality and in a manner that appropriately balances the effectiveness of the investigation with the rights of the persons concerned. Such measures shall not constitute disciplinary sanctions or adverse treatment in respect of the relevant individual.

Where the Company determines that the risk of retaliation continues, it shall review the protective measures and update them where considered appropriate.

SECTION NINE

Bad Faith Reports

Article 19

Article 19 – Bad Faith Reports

Knowingly providing false information, submitting fabricated documentation or misusing the whistleblowing mechanism with the intention of causing harm to others shall not be protected under this Policy.

Such conduct shall be addressed under the applicable disciplinary provisions and, where appropriate, legal remedies may be pursued.

However, the mere fact that a report cannot be substantiated or that no violation is established following an investigation shall not, of itself, constitute a bad faith report.

SECTION TEN

Reporting and Board Oversight

Article 20 – Periodic Reporting

Aggregated, anonymised and de-identified information concerning the operation of the whistleblowing mechanism shall be reported periodically to the Board of Directors or to such committee as it may designate.

Where appropriate, such reporting shall include:

- a) the number and overall distribution of whistleblowing reports received;
- b) the categories of reports and associated risk areas;
- c) the average completion times for preliminary assessments and investigations;
- d) the number and outcomes of completed whistleblowing cases;
- e) corrective and preventive actions implemented;
- f) recurring patterns of violations and root cause analyses;
- g) systemic risks and control deficiencies;
- h) recommendations for improving the whistleblowing mechanism; and
- i) such other performance indicators as may be considered appropriate.

The reporting process shall safeguard the protection of personal data, confidentiality and the integrity of investigations. Reports submitted to the Board of Directors shall focus on evaluating the effectiveness of the whistleblowing system rather than providing details of individual cases.

Article 21 – Board Oversight

The Board of Directors shall be responsible for overseeing the effectiveness of the whistleblowing mechanism and ensuring that it operates independently, reliably, accessibly and effectively.

Within this scope, the Board of Directors shall:

- a) regularly evaluate the effectiveness of the whistleblowing system;

- b) ensure that the whistleblowing mechanism is supported by adequate resources, authority and organisational support;
- c) review reported systemic risks, significant findings and recommendations for improvement;
- d) support such policy, process and control improvements as may be considered necessary;
- e) request such additional information and explanations as it considers necessary in relation to serious ethical violations or high-risk reports; and
- f) where considered appropriate, commission reviews, assessments or assurance engagements through independent experts or external advisers.

The Board of Directors shall support the operation of the whistleblowing mechanism free from any improper influence by any individual or organisational unit and shall provide leadership in promoting the Company's ethical culture.

SECTION ELEVEN

Training and Awareness

Article 22 – Training Programmes

The Company shall conduct regular training and awareness activities to ensure the effective operation of the whistleblowing mechanism, strengthen the Company's ethical culture and raise awareness of employees' rights and responsibilities.

Training programmes shall be planned on a risk-based and role-based basis, taking into account the nature of duties performed and the risks to which individuals may be exposed.

Where appropriate, training programmes shall address the following topics:

- a) ethical culture and corporate values;
- b) the purpose and operation of the whistleblowing mechanism;
- c) the proper use of whistleblowing channels;
- d) employees' rights and responsibilities;
- e) the principles of good faith reporting and confidentiality;
- f) protection against retaliation;
- g) the early identification and reporting of ethical violations; and
- h) the investigation process and its fundamental principles.

The Company shall appropriately maintain records of participation in training activities, periodically assess the effectiveness of such training and update training content where necessary.

Article 23 – Communication and Awareness Activities

The Company shall conduct regular communication and awareness activities to ensure that the whistleblowing mechanism is known to all employees and relevant stakeholders, remains readily accessible and is recognised as a reliable reporting mechanism.

Where appropriate, the following communication tools may be used:

- a) internal communications;
- b) the intranet and digital communication platforms;
- c) policy and procedure documents;
- d) training materials and guidance documents;
- e) awareness programmes for managers;
- f) ethics awareness campaigns; and
- g) other appropriate communication tools.

Communication activities shall clearly and comprehensively explain the purpose of the whistleblowing mechanism, the principle of confidentiality, protection against retaliation, the available reporting channels and the concept of good faith reporting.

The Company shall periodically evaluate the effectiveness of its communication activities and enhance its awareness initiatives by taking into account feedback received from employees and stakeholders.

SECTION TWELVE

Confidentiality, Data Protection and Record Retention

Article 24 – Confidentiality and Data Protection

Personal data, trade secrets and other confidential information obtained during the whistleblowing process shall be processed solely for the purposes of assessing, investigating and resolving whistleblowing reports and fulfilling related legal and organisational obligations, in accordance with the applicable legislation.

For this purpose, the Company shall implement the necessary technical, administrative and organisational measures to ensure:

- a) compliance with legislation relating to the protection of personal data;

- b) the protection of trade secrets and other confidential information;
- c) respect for the right to privacy;
- d) the implementation of information security, cybersecurity and access control measures; and
- e) compliance with the principles of data minimisation and purpose limitation.

Information and documentation obtained through the whistleblowing process shall be accessible only to appropriately authorised persons who require such access by virtue of their duties. Such persons shall remain bound by their confidentiality obligations even after their duties have ceased.

All activities relating to the processing and protection of personal data shall be conducted in accordance with the Company's **Personal Data Protection Policy, Information Security Policy** and other relevant Company policies and procedures.

Article 25 – Record Retention and Disposal

Records relating to whistleblowing reports, investigation files, reports, decisions and other relevant documentation shall be retained in accordance with:

- a) the applicable legislation;
- b) the Company's **Document and Records Management Policy**; and
- c) the Company's policies and procedures relating to information security and the protection of personal data.

Records shall be protected against unauthorised access, alteration, deletion, loss or disclosure through appropriate technical and administrative measures.

Retention periods shall be determined having regard to the applicable legislation and the Company's record retention requirements. Upon expiry of the applicable retention period, records shall be securely disposed of, erased, destroyed or anonymised in accordance with the applicable legislation.

Where considered appropriate, anonymised data may be used for monitoring ethical risks, corporate reporting and continual improvement initiatives.

SECTION THIRTEEN

Implementation of the Policy and Responsibilities

Article 26 – Responsibilities of the Board of Directors

The Board of Directors shall have ultimate responsibility for:

- a) approving and bringing this Policy into force;
- b) overseeing the independent, reliable and effective operation of the whistleblowing mechanism;

- c) overseeing the provision of adequate resources, authority and organisational support for the whistleblowing system;
- d) regularly evaluating the effectiveness of the system and supporting necessary improvements; and
- e) being informed of significant ethical risks and systemic findings.

The Board of Directors shall embrace and promote the principle of **"tone at the top"** in fostering the Company's ethical culture and supporting the implementation of this Policy.

Article 27 – Responsibilities of the Chief Executive Officer

The Chief Executive Officer shall be responsible for:

- a) ensuring the effective implementation of this Policy;
- b) establishing the organisational structure necessary for the effective operation of the whistleblowing mechanism;
- c) ensuring the provision of adequate human resources, financial resources and technological infrastructure; and
- d) ensuring coordination among the relevant organisational functions.
- e) supporting the development of the Company's ethical culture and awareness initiatives; and
- f) ensuring that the necessary reports are submitted to the Board of Directors in a timely manner.

Article 28 – Responsibilities of Managers

Managers shall be responsible for:

- a) acting as role models in demonstrating ethical conduct;
- b) supporting employees in using the whistleblowing mechanism with confidence;
- c) contributing to the prevention of all forms of retaliation against individuals who submit whistleblowing reports;
- d) promptly referring whistleblowing reports brought to their attention through the appropriate reporting mechanisms;
- e) supporting the development of the Company's ethical culture and promoting awareness among employees; and
- f) ensuring the effective implementation of this Policy within their respective areas of responsibility.

Article 29 – Responsibilities of Employees

Employees shall be responsible for:

- a) complying with the Company's ethical principles, policies and procedures;
- b) reporting, in good faith, serious ethical violations or any reasonable suspicion of such violations;
- c) providing accurate, honest and complete information during investigation processes;
- d) maintaining the confidentiality of information obtained during the investigation process; and
- e) contributing to the use of the whistleblowing mechanism in accordance with the principles of integrity, good faith and responsibility.

No employee shall misuse the reporting rights provided under this Policy or knowingly submit false reports.

SECTION FOURTEEN

Policy Violations

Article 30 – Policy Violations and Sanctions

Any violation of this Policy shall be assessed in accordance with the applicable legislation and the Company's disciplinary policies and procedures, taking into account the nature and seriousness of the violation, the element of intent, its consequences and any other relevant circumstances.

The following conduct, among others, may be regarded as serious violations because it undermines the reliability and effectiveness of the whistleblowing system:

- a) unauthorised disclosure of the identity of a whistleblower, witness or any person contributing to an investigation;
- b) retaliating against individuals who submit whistleblowing reports or contribute to an investigation;
- c) intentionally obstructing, delaying or attempting to influence the assessment of a whistleblowing report or the investigation process;
- d) destroying, altering, concealing or fabricating evidence;
- e) operating or using the whistleblowing mechanism in bad faith or for improper purposes; and
- f) breaching confidentiality obligations.

Where Policy violations also give rise to legal, administrative or criminal liability, the Company may initiate the necessary legal or administrative proceedings or notify the competent public authorities in accordance with the applicable legislation.

SECTION FIFTEEN

Monitoring and Continual Improvement

Article 31 – Monitoring and Continual Improvement

The Company shall regularly monitor, evaluate and continually improve the whistleblowing mechanism to ensure its effectiveness, reliability and alignment with internationally recognised good practices.

Where appropriate, the following performance indicators may be monitored:

- a) the number of whistleblowing reports received;
- b) the distribution of reports by subject matter and risk area;
- c) the average completion time for preliminary assessments and investigations;
- d) the rate of substantiated ethical violations;
- e) the effectiveness of corrective and preventive actions;
- f) allegations of retaliation and their outcomes;
- g) participation rates in training and awareness programmes;
- h) assessments of employees' confidence in the whistleblowing system;
- i) findings arising from internal audit, external audit and other assurance activities; and
- j) such other performance indicators as may be considered appropriate.

Monitoring results shall be evaluated for the purposes of reducing ethical risks, improving policies and processes, strengthening the internal control system and continually enhancing the Company's ethical culture.

SECTION SIXTEEN

Review of the Policy

Article 32 – Review of the Policy

This Policy shall be reviewed by the **Corporate Governance Committee** at least annually to ensure that it remains effective and up to date.

Amendment proposals may be prepared taking into consideration the following matters:

- a) changes in legislation;
- b) changes in ethical risks;

- c) experience gained from the operation of the whistleblowing system;
- d) the results of internal audit, external audit and other assurance activities;
- e) whistleblowing statistics and performance indicators; and
- f) developments in national and international good practices and corporate governance standards.

The proposed amendments shall be submitted to the Board of Directors for approval.

SECTION SEVENTEEN

Entry into Force and Administration

Article 33 – Entry into Force

This Policy shall enter into force on the date of its approval by the Board of Directors.

Article 34 – Administration

The Board of Directors shall be responsible for overseeing the implementation of this Policy.

The Chief Executive Officer shall ensure the effective integration and implementation of this Policy within the Company's day-to-day operations, the provision of the necessary resources and coordination among the relevant organisational functions.

The **Legal and Compliance Function, Human Resources Function, Internal Audit Function** and other relevant functions shall contribute to the implementation of this Policy within the scope of their respective duties and authorities and shall discharge the responsibilities assigned to them.

All employees and managers involved in the implementation of this Policy shall cooperate within the scope of their respective duties and responsibilities, provide the necessary information and support, and act in accordance with the provisions of this Policy.

ANNEXES

Annex 1: Whistleblowing Report Form

Annex 2: Whistleblowing Process Flowchart

Annex 3: Preliminary Assessment Checklist

Annex 4: Ethical Investigation Process Guide

Annex 5: Retaliation Risk Assessment Form

Annex 6: Whistleblowing Register Template

Annex 7: Annual Whistleblowing Activity Report Template