

WHISTLEBLOWING POLICY

1. Foreword

This Whistleblowing Policy (**the “Policy”**) has been prepared to set out the principles and procedures for the safe, confidential, accessible and retaliation-free reporting of unethical conduct, breaches of applicable legislation, compliance violations, human rights violations, responsible supply chain risks, and situations contrary to the policies and procedures of KÂR Katılım Altın Rafinerisi A.Ş. (**the “Company”**) that are currently ongoing or may arise in the future within the scope of the Company’s activities.

2. Introduction

The Company recognizes that an ethical business culture, regulatory compliance, transparency and accountability should be supported by a strong reporting mechanism.

The Company attaches importance to enabling employees, customers, suppliers, business partners and other stakeholders to safely report their concerns regarding unethical conduct, compliance violations, human rights violations, responsible supply chain risks, conflicts of interest, suspected bribery and corruption, or any situation inconsistent with the Company’s principles and rules.

This Policy sets out the fundamental framework for the assessment of reports in accordance with the principles of confidentiality, impartiality, good faith and due care; the protection of reporting persons against retaliation; and the implementation of corrective and preventive actions where necessary.

The Company considers the reporting mechanism not only as a tool for detecting violations, but also as an important governance element for strengthening ethical culture, identifying compliance risks at an early stage and supporting an environment of corporate trust.

3. Purpose and Scope

The purpose of this Policy is to determine the procedures and principles for the safe, confidential, accessible and effective reporting of unethical conduct, breaches of applicable legislation, compliance violations, human rights violations, responsible supply chain risks and situations contrary to the Company’s policies and procedures that may arise within the scope of the Company’s activities.

This Policy covers reports that may be made by employees, managers, members of the Board of Directors, customers, suppliers, business partners, service providers,

subcontractors, consultants and other stakeholders who have a direct or indirect business relationship with the Company.

Within the scope of this Policy, conduct contrary to ethical principles, conflicts of interest, suspected bribery and corruption, fraud and irregularities, human rights violations, harassment, workplace bullying (mobbing), discrimination, occupational health and safety risks, confidentiality and personal data breaches, breaches of legislation and situations contrary to responsible supply chain principles may be subject to reporting.

The Company evaluates reports made under this Policy in accordance with the principles of confidentiality, impartiality, good faith, due care and prevention of retaliation. The reporting mechanism is operated to strengthen ethical business culture, identify violations and non-conformities at an early stage, protect stakeholder trust and implement corrective and preventive actions where necessary.

4. Fundamental Principles

The Company adopts the principle that the reporting mechanism for ethics and compliance violations shall be operated in a reliable, accessible, impartial and effective manner. In this context, all reports are evaluated in line with the following fundamental principles:

Confidentiality: The identity of the reporting party, the content of the report and information relating to the review process are protected in accordance with the principle of confidentiality.

Anonymous Reporting: The reporting party may submit a report anonymously, without disclosing their identity or contact details. Anonymous reports are also assessed in accordance with the principles of confidentiality, impartiality, good faith, due care and prevention of retaliation.

Impartiality: Reports are evaluated in a fair, objective and unbiased manner towards all relevant parties.

Good Faith: Reports are expected to be made in good faith based on reasonable suspicion, observation or information.

Prevention of Retaliation: Retaliation, pressure, threats, discrimination or any adverse treatment against persons who make reports in good faith or contribute to review processes is not tolerated.

Accessibility: The reporting mechanism is made easily accessible to employees, customers, suppliers, business partners and other stakeholders.

Careful Review: Reports are assessed within a reasonable period of time, with due care and attention, taking into account the nature and significance of the matter.

Protection of Personal Data: Personal data obtained during reporting and review processes are processed and protected in accordance with applicable personal data protection legislation and the Company's internal regulations.

5. Reportable Matters

Within the scope of this Policy, any situation considered to be contrary to the Company's ethical principles, internal regulations, applicable legislation, regulatory requirements or responsible business conduct may be reported.

The following matters, including but not limited to these, may be subject to reporting:

- Conduct contrary to ethical principles and codes of conduct,
- Breaches of legislation, regulatory requirements or the Company's policies and procedures,
- Suspected bribery, corruption, improper benefit or conflicts of interest,
- Fraud, deception, forgery, inaccurate record-keeping or document manipulation,
- Human rights violations, discrimination, harassment, workplace bullying (mobbing), ill-treatment, forced labour or suspected child labour,
- Occupational health and safety risks or situations that may endanger a safe working environment,
- Breaches of confidentiality, information security or personal data protection,
- Human rights, origin, traceability, conflict financing, illegal mining, money laundering, terrorist financing, anti-bribery and anti-corruption, or supplier-related ethics and compliance risks within the scope of the precious metals responsible supply chain,
- Conduct that may adversely affect the Company's reputation, reliability or market integrity,
- AML/CFT and sanctions risks arising from customers, suppliers, business partners or transactions that may be subject to suspicious transaction assessment under Law No. 5549 and the relevant MASAK regulations.

The reporting party is not expected to prove that the reported matter has definitively occurred. Reports based on reasonable suspicion, observation or good-faith concern are evaluated within the scope of this Policy.

6. Breaches and Sanctions

Any conduct contrary to this Policy, the Company's policies and procedures, ethical principles or applicable legislation shall be considered a breach. Taking into account the

nature, severity, recurrence and impact of the breach, as well as the status of the relevant party, necessary administrative, disciplinary, contractual and/or legal actions shall be applied.

For employees, appropriate disciplinary and administrative actions shall be taken within the framework of applicable labour legislation, employment agreements, ethical principles and the relevant internal regulations of the Company. For third parties, suppliers, customers, business partners, service providers and consultants, necessary actions shall be applied within the framework of the relevant contractual provisions, undertakings and Company procedures, including the suspension, restriction or termination of the business relationship.

Depending on the nature of the breach and applicable legislation, notifications shall be made to competent authorities, reports shall be submitted to regulatory bodies or referrals shall be made to administrative/judicial authorities where necessary. The Company does not tolerate retaliation against persons who make reports in good faith.

In situations that give rise to, or may potentially give rise to, a conflict of interest, employees, managers, members of the Board of Directors and relevant parties acting on behalf of the Company are required to disclose such situation in a timely manner and in writing. Conflict of interest declarations shall be obtained at least annually and on an event-driven basis through the Conflict of Interest Declaration Form; declarations received shall be recorded, monitored and retained confidentially by the Internal Control and Supply Chain Compliance Officer in the Conflict of Interest Declaration Register.

7. Reporting Methods and Channels

Employees, customers, suppliers, business partners and other stakeholders who wish to make a report may submit their concerns, suspicions, observations or information regarding ethics and compliance violations through the reporting channels designated by the Company.

Reports are expected to contain information that is as clear, understandable and suitable for assessment as possible. In this context, reports may include the subject of the incident, the relevant persons or parties, the time and place where the incident occurred or may occur, any witnesses, supporting information and documents, and other explanations regarding the reported matter.

The reporting party is not expected to prove the reported matter definitively. Reports based on reasonable suspicion, observation or good-faith concern are evaluated within the scope of this Policy.

The Company takes care to protect the confidentiality of the reporting party. Reports are shared only with persons who need to know for assessment and review purposes within the relevant internal processes.

Reports may be submitted by providing the reporting party's name and contact details, or anonymously. In anonymous reports, the reporting party is expected to provide information in as much detail as possible to enable an effective assessment, including the subject of the incident, relevant persons or parties, date, place, any witnesses, supporting information and documents, and other explanations regarding the reported matter. Where identity or contact details are not provided in anonymous reports, the Company's ability to request additional information or provide feedback to the reporting party may be limited.

The Company establishes multiple reporting channels to enable reports regarding ethics and compliance violations to be submitted in a secure, confidential and, where necessary, anonymous manner. Reports may be submitted through corporate e-mail addresses, written mail, the Ethics and Compliance Violations Reporting Form available on the Company's website, or other secure reporting channels determined by the Company.

The Company establishes anonymous reporting mechanisms to the extent technically possible, enabling reporting persons to submit reports without disclosing their identity. Anonymous reports do not require the disclosure of identity information. However, in order to enable the report to be assessed effectively, the subject matter, date, parties involved, any supporting information and documents, and concrete details regarding the report are expected to be provided.

Where the reported matter directly or indirectly concerns the Internal Control and Supply Chain Compliance Officer, senior management or persons involved in the assessment of reports, or where a conflict of interest or concern regarding impartiality arises in relation to such persons, the relevant person shall not be involved in the assessment process. Such reports shall, as a rule, be assessed under the oversight of the Chairmanship of the Board of Directors. However, where the report directly or indirectly concerns the Chairman of the Board of Directors or where a conflict of interest or concern regarding impartiality arises in relation to the Chairman of the Board of Directors, the report shall not be forwarded to the Chairman of the Board of Directors and the Chairman shall not take part in the assessment process. In such case, the report shall be forwarded to the independent external legal counsel authorized by the Company.

Reports may be submitted through the following channels:

Compliance Matters: compliance@karaltinrafinerisi.com

Ethics & Whistleblowing Notifications: etik@karaltinrafinerisi.com

Web Form: Ethics and Compliance Violations Reporting Form

Address: Yarımburgaz Mah. 1. Cumhuriyet Cad. No:50 İç Kapı No: 1 Küçükçekmece / İstanbul / TÜRKİYE

For confidential reports to be submitted to the Chairmanship of the Board of Directors, the envelope may be marked as “To the Chairmanship of the Board of Directors / Confidential”.

Access to reporting channels shall be restricted in accordance with the principles of confidentiality and segregation of duties. Only authorized persons may access e-mail accounts relating to ethics and compliance reports, sealed envelopes received by mail, records of the Ethics and Compliance Violations Reporting Form, and relevant reporting files.

Access to reporting channels shall, as a rule, be managed by the Internal Control and Supply Chain Compliance Officer. Where necessary, a person authorized by the Board of Directors, independent external legal counsel or relevant independent advisor may be involved in the process. Where the subject matter of the report concerns the person assessing the report, persons closely related to them, or decision-making bodies to which they directly report, the relevant person shall not be involved in the assessment process and the report shall be directed to an alternative authorized review authority.

8. Assessment of Reports and Review Process

Reports submitted to the Company are assessed within the framework of relevant internal processes, taking into account the nature and significance of the matter.

Reports are taken into preliminary assessment as soon as reasonably practicable after they are received by the Company. As a principle, the preliminary assessment process shall be initiated within no later than five (5) business days from the date of receipt of the report. Where the reporting party has provided their identity and contact details, an acknowledgement of receipt or appropriate information regarding the process may be provided within a reasonable period.

The review process is aimed to be completed within thirty (30) business days, to the extent possible, taking into account the nature and scope of the report, the number of relevant parties, the need for information and documents, and the complexity of the matter. Where the review requires a longer period, the reason for the delay is recorded and the process continues to be conducted in accordance with the principles of confidentiality, impartiality and due care.

The date of receipt of the report, the date on which the report is taken into preliminary assessment, the result of the preliminary assessment, the responsible person/unit, any reason for delay and subsequent actions are recorded through the Reporting Tracking Register maintained by the Company.

The Reporting Tracking Register is maintained by the Internal Control and Supply Chain Compliance Officer. Where the report directly or indirectly concerns the Internal Control and Supply Chain Compliance Officer, senior management or persons involved in the assessment of reports, or where a conflict of interest or concern regarding impartiality arises in relation to such persons, the relevant person shall not be involved in the assessment, recordkeeping and follow-up process.

In such reports, the recordkeeping and follow-up process shall, as a rule, be carried out under the oversight of the Chairmanship of the Board of Directors. However, where the report directly or indirectly concerns the Chairman of the Board of Directors or where a conflict of interest or concern regarding impartiality arises in relation to the Chairman of the Board of Directors, the Chairman of the Board of Directors shall not take part in the assessment, recordkeeping and follow-up process. In such case, the process shall be carried out under the oversight of the independent external legal counsel authorized by the Company.

Records relating to reporting and review processes shall, as a rule, be retained for eight (8) years from the closure date of the relevant review file. For records connected with anti-money laundering, counter-terrorist financing, sanctions, customer due diligence, due diligence, suspicious transaction assessment or similar AML/CFT processes, the retention and submission periods prescribed under the applicable legislation shall be reserved. In cases where there is an ongoing audit, investigation, litigation, administrative process or legal obligation, records may be retained until such processes are completed and the relevant retention obligations expire. Upon expiry of the retention period, records are deleted, destroyed or anonymized in accordance with applicable personal data protection legislation and the Company's personal data retention and destruction processes.

Information regarding the processing of personal data in reporting and review processes is made available to relevant individuals through the "Personal Data Processed within the Scope of Ethics and Whistleblowing Reporting Channels" section of the Personal Data Protection Notice published on the Company's website.

The principles of confidentiality, impartiality, good faith, due care and protection of personal data are observed in the assessment of reports. During the review process, the scope of the reported incident or situation, relevant parties, available information and documents, and any supporting evidence are taken into consideration.

Depending on the nature of the reported matter, the Company may request additional information and documents, obtain the views of relevant parties and operate appropriate internal processes for the assessment of the matter where deemed necessary.

The review process is carried out on a need-to-know basis only. The identity of the reporting party and the content of the report are protected in accordance with the principle of confidentiality.

If, as a result of the review, an ethics or compliance violation or a situation contrary to the Company's policies and procedures is identified, the Company ensures the implementation of necessary corrective and preventive actions. Taking into account the nature, severity, recurrence and impact of the violation, as well as the status of the relevant party, appropriate administrative, contractual and/or legal actions may be assessed within the framework of applicable labour legislation, employment agreements, ethical principles and relevant internal regulations of the Company for employees, and within the framework of applicable contractual provisions and Company procedures for suppliers, customers, business partners and other third parties. Where necessary, appropriate actions may be taken, including suspension or termination of the business relationship, termination of the contract, notification to competent authorities or referral to judicial authorities.

9. Prohibition of Retaliation

The Company adopts the principle that no retaliation shall be taken against persons who make reports in good faith or contribute to review processes.

In this context, the reporting party shall not be subjected to pressure, threats, discrimination, exclusion, reassignment, negative performance evaluation, unfair adverse impact on the business relationship or any similar adverse treatment due to making a report or contributing to the review process.

It is sufficient for the reporting party to make a report in good faith based on reasonable suspicion, observation or information available to them. Even if the reported matter is not substantiated as a result of the review, no sanction shall be imposed against the reporting party if the report was made in good faith.

The Company attaches importance to ensuring that the reporting party feels safe and can raise concerns regarding ethics or compliance violations without fear of retaliation.

However, reports that are intentionally false, misleading, defamatory, made for personal gain or intended to harm another person are not considered good-faith reports. If such situations are identified, the Company reserves the right to assess necessary actions in accordance with applicable legislation and internal regulations.

10. Authorities and Responsibilities

The ultimate oversight responsibility for the implementation of this Policy rests with the Company's Board of Directors. The Company's senior management is responsible for ensuring that the reporting mechanism for ethics and compliance violations is operated effectively, reliably and accessibly.

The Internal Control and Supply Chain Compliance Officer supports the assessment of reports within the framework of relevant internal processes, the initiation of the review process where necessary, and the follow-up of corrective and preventive actions.

Where a report directly or indirectly concerns the Internal Control and Supply Chain Compliance Officer, senior management or persons involved in the assessment of reports, or where a conflict of interest or concern regarding impartiality arises in relation to such persons, the relevant person shall not be involved in the assessment process.

Such reports shall, as a rule, be assessed under the oversight of the Chairmanship of the Board of Directors. However, where the report directly or indirectly concerns the Chairman of the Board of Directors or where a conflict of interest or concern regarding impartiality arises in relation to the Chairman of the Board of Directors, the report shall not be forwarded to the Chairman of the Board of Directors and the Chairman shall not take part in the assessment process. In such case, the report shall be forwarded to the independent external legal counsel authorized by the Company.

Relevant process owners cooperate in the assessment of reports falling within their areas of responsibility and in taking necessary actions.

All employees, managers and relevant parties acting on behalf of the Company are responsible for reporting unethical conduct, compliance violations, breaches of the Company's policies and procedures or concerns based on reasonable suspicion in good faith, and for acting in accordance with the principles set out in this Policy.

11. Training and Awareness

The Company conducts the necessary training and awareness activities to ensure that ethics and compliance violations can be reported in a timely, accurate and secure manner; that the reporting mechanism can be used effectively; and that the principles of confidentiality, good faith, impartiality and prevention of retaliation are understood by employees, managers and relevant parties. The Internal Control and Supply Chain Compliance Officer supports the planning, implementation and monitoring of the effectiveness of training activities.

Trainings are conducted regularly during the onboarding process and at least once a year. The training scope is determined to include reporting of ethics and compliance violations,

use of reporting channels, the possibility of anonymous reporting, confidentiality, good-faith reporting, prohibition of retaliation, conflicts of interest, anti-bribery and anti-corruption, human rights, responsible supply chain, protection of personal data, and compliance with relevant policies/procedures. The training content may be expanded by taking into account the duties, responsibilities and risk profiles of the participants.

Training attendance records, training materials and, where necessary, measurement and evaluation results are recorded. Training activities are reviewed where needed, and additional information sessions or refresher trainings are organized where deemed necessary.

12. Record Keeping and Confidentiality

Records, training attendance lists, training materials, declarations, approvals, reports, review records, action tracking records, correspondence and relevant supporting documents created within the scope of this Policy shall be retained for at least eight (8) years.

For records related to anti-money laundering, counter-terrorist financing, sanctions, customer identification, due diligence, suspicious transaction assessment or similar AML/CFT processes, the commencement date of the retention period shall be determined based on the date of issuance for documents, the date of the last entry for books and records, and the date of the last transaction for identification and due diligence documents.

Where a longer retention period is required under applicable legislation, or where there is an ongoing audit, review, investigation, litigation, administrative process or legal obligation, records may be retained until such processes are completed and the relevant retention obligations expire. Upon expiry of the retention period, records shall be deleted, destroyed or anonymized in accordance with applicable personal data protection legislation and the Company's data retention and destruction processes.

13. Review and Update

This Policy is reviewed at least once a year and updated where deemed necessary.

The review process is carried out by taking into account the Company's activities, organizational structure, operation of the reporting mechanism, reports received, review results, corrective and preventive actions, legislative changes and updates to relevant national and international standards.

14. Publication and Transparency of the Policy

This Policy is published and made accessible to relevant stakeholders through the Company's official website and appropriate communication channels. The Company

undertakes to keep the Policy publicly available, accessible, and up to date in line with the principle of transparency.

Related Documents:

- Ethical Principles and Code of Conduct
- Anti-Bribery and Anti-Corruption Policy
- Human Rights Policy
- Anti-Money Laundering and Counter-Terrorist Financing Policy
- Precious Metals Responsible Supply Chain Policy
- Ethics and Compliance Violations Reporting Form
- Conflict of Interest Declaration Form
- Personal Data Protection Notice

15. Approval and Effectiveness

This Whistleblowing Policy entered into force upon approval by the Board of Directors on 11/08/2026.

In the event of any inconsistency, discrepancy or difference in interpretation between the Turkish version and the English version of this Policy, the Turkish version shall prevail.

Document Information	Description
Board Resolution Date	11/08/2026
Board Resolution Number	2026-05
Effective Date	11/08/2026
Version No.	01
Revision No.	00
Document ID	POL.19
Prepared By	Gökçe YILMAZ – Internal Control and Supply Chain Compliance Officer Şerafettin KULELİ – Internal Control and Supply Chain Compliance Officer
Approved By	Sercan YAŞA – Chairman
Last Review Date	07/08/2026
Next Review Date	22/07/2026
Publication Date	09/09/2026