

ETHICS AND COMPLIANCE VIOLATIONS REPORTING FORM

Form No.	FRM-ETH-001	Version	01
Effective Date	11/08/2026	Form Owner	Internal Control and Supply Chain Compliance Officer
Confidentiality Classification	Confidential	Related Policy	Ethics and Compliance Violations Reporting Policy

1. Purpose and Instructions for Use

This form is used to report unethical conduct, compliance violations, human rights violations, suspected bribery and corruption, conflicts of interest, responsible supply chain risks, AML/CFT and sanctions risks, and conduct contrary to Company policies and procedures.

Reports are assessed in accordance with the principles of confidentiality, impartiality, good faith, due care and protection against retaliation. The reporting person is not required to provide identity or contact information and may report anonymously. However, to enable an effective assessment, the subject matter and date of the incident, the parties involved, any supporting information and documents, and specific details should be provided.

2. Reporting Channels

Reporting Method	☐ Email ☐ Written Mail ☐ Web Form ☐ Other:
Compliance Matters	compliance@karaltinrafinerisi.com
Ethics and Whistleblowing Reports	etik@karaltinrafinerisi.com
Mailing Address	Yarımburgaz Mah. 1. Cumhuriyet Cad. No: 50, Unit No: 1, Küçükçekmece / İstanbul / TÜRKİYE
Confidential Reporting Note	For written reports, the envelope may be marked "Ethics and Compliance Report / Confidential".
Anonymous Report	☐ Yes, I wish to report anonymously. ☐ No, I wish to provide my identity/contact details.

3. Reporting Person's Details (Optional)

Full Name	
Title / Organisation / Type of Relationship	☐ Employee ☐ Customer ☐ Supplier ☐ Business Partner ☐ Other:
Email / Telephone	
Follow-up Requested	☐ Yes ☐ No
Disclosure of Identity Information	☐ I request that my identity be kept confidential. ☐ I wish to remain anonymous.

4. Subject of the Report

☐ Breach of ethical principles or the code of conduct	☐ Suspected bribery, corruption, improper benefit or facilitation payment
☐ Conflict of interest	☐ Fraud, deception, forgery, or manipulation of records or documents

☐ Human rights violation, discrimination, harassment, workplace bullying or ill-treatment	☐ Occupational health and safety risk
☐ Breach of confidentiality, information security or personal data protection	☐ Responsible supply chain / origin / traceability / conflict financing risk
☐ AML/CFT, sanctions, PEP or adverse media risk	☐ Other:

5. Incident / Violation Details

Brief Title of Incident	
Incident Date / Period	
Location / Relevant Department	
Persons, Parties or Organisations Concerned	
Witnesses, if any	
Detailed Description of Incident	
Has the Matter Been Reported Previously?	☐ No ☐ If yes, date/channel:
Is There an Immediate Risk or Ongoing Violation?	☐ No ☐ If yes, details:

6. Supporting Information and Documents

Are Any Documents / Records / Emails / Images Available?	☐ No ☐ Yes
Documents Attached	1. 2. 3.
Additional Sources of Information	
Document Sharing Notice	If the documents shared contain personal data relating to third parties, only information that is necessary and proportionate for assessing the report should be provided.

7. Conflicts of Interest and Alternative Review Authority

If the matter reported directly or indirectly concerns the Internal Control and Supply Chain Compliance Officer, senior management, the Chair of the Board of Directors or any person involved in reviewing reports, or if a conflict of interest or concern regarding impartiality arises in relation to such person, that person shall not participate in the review process.

Where a report concerns the Chair of the Board of Directors, it shall not be referred to the Chair, and the Chair shall not participate in the review process. Such reports shall be referred to another relevant member of the Board of Directors, the audit committee, if any, or independent external legal counsel authorised by the Company.

Person / Department Concerned by the Report	
Is There a Conflict of Interest Concern?	☐ No ☐ Yes
Is Referral to an Alternative Review Authority Required?	☐ No ☐ If yes, authority:

8. Internal Use - Preliminary Assessment and Follow-up

This section shall be completed only by authorised persons.

Report Reference No.	
Date Report Received	
Date Preliminary Assessment Commenced	
Preliminary Assessment Outcome	☐ Proceed to investigation ☐ Request additional information ☐ Out of scope ☐ Other
Responsible Person / Department	
Reason for Delay	
Investigation Start Date	
Investigation Closure Date	
Further Action / CAPA	

9. Access Authority Matrix for Reporting Channels

Access to reporting channels and report files is restricted in accordance with the principles of confidentiality, need-to-know and segregation of duties.

Channel / Record	Primary Access Holder	Backup / Alternative Authorised Person	Note
compliance@karaltinrafinerisi.com	Internal Control and Supply Chain Compliance Officer	Person authorised by the Board of Directors	Access shall be restricted and logged.
etik@karaltinrafinerisi.com	Internal Control and Supply Chain Compliance Officer	Person authorised by the Board of Directors	The confidentiality and need-to-know principles apply.
Written mail / sealed envelope	Authorised person	Alternative authorised person	Records of envelope opening and delivery shall be maintained.
Web form / whistleblowing hotline	Authorised person	Alternative authorised person / external legal counsel	If established, access rights shall be defined separately.
Reports involving conflicts of interest	Alternative review authority	Independent external legal counsel	The person concerned shall not participate in the process.

10. Confidentiality, Personal Data Protection and Prohibition of Retaliation Notice

Information and personal data shared through this form may be processed for the purposes of receiving, assessing, investigating and concluding the report; carrying out necessary corrective and preventive actions; complying with legal obligations; and protecting the Company's rights.

Persons making reports shall not be subjected to retaliation, pressure, threats, discrimination or adverse treatment because of good-faith reports. Reports that are deliberately false, misleading or intended to cause harm shall not be regarded as good-faith reports.

Information regarding the processing of personal data is provided separately in the Company's Privacy Notice on the Protection of Personal Data.

11. Declaration

I declare that I am making this report in good faith, based on the information, observations or reasonable suspicions available to me.

Date	
Full Name / Anonymous	
Signature (for hard-copy forms)	