BATIÇİM ANTI-RETALIATION POLICY

1. PURPOSE

The purpose of Batıçim's Anti-Retaliation Policy ("Policy") is to define the standards, principles, and rules used by Batıçim Batı Anadolu Çimento Sanayii A.Ş. to identify, assess, and impose sanctions on actions considered as "retaliation," and to ensure that employees are treated fairly, appropriately, and consistently throughout all related processes.

It is essential that an employee who makes a report, contributes to the Company's investigation or disciplinary process, or exercises a legal right feels comfortable and safe, and does not worry that their professional life will be adversely affected as long as they act honestly and in good faith. Within this framework, this Policy has been prepared to ensure that employees feel secure and to create a healthy working environment.

2. SCOPE

This Policy applies to all units, departments, and business processes within Batıçim. In addition, the scope of the Policy is reviewed and updated on an ongoing basis, and at least once a year, to ensure Batıçim's compliance with ethical, legal, and business-related developments.

Batıçim expects its suppliers, contractors, and business and solution partners to comply with this Policy and to exercise due care regarding the matters addressed herein. For this purpose, Batıçim includes a provision in its contracts with suppliers, contractors, and business partners requiring compliance with this Policy.

3. DEFINITIONS

Abbreviation / Term	Description
Immediate Manager	Refers to the first manager to whom the Employee directly reports.
Employee	Refers to all Batıçim employees working under an employment contract at Batıçim.
Disciplinary Sanction	Refers to the sanction imposed due to actions that are in violation of the employment contract and/or applicable legislation and/or Batıçim Code of Business Ethics and Working Principles, as well as relevant policies, procedures, instructions, regulations, circulars, and other internal company regulations.
Disciplinary Offense	Refers to actions that may damage Batıçim's reputation, disrupt workplace harmony, violate applicable legislation and/or the Batıçim Code of Business Ethics and Working Principles, Batıçim policies, procedures, regulations, circulars, and other internal company regulations, as well as breach the relevant employment contract.
Ethics Committee	The Ethics Committee, operating under the Executive Committee, has been established to evaluate notifications submitted to it regarding alleged violations of ethical rules within the scope of the Batı Anadolu Group of Companies Code of Business Ethics and Working Principles and other policies and procedures falling within the Ethics Committee's area of supervision related to the business and operations of the Batı Anadolu Group of Companies, and to provide recommendations to the management of

Abbreviation / Term	Description
	the Batı Anadolu Group of Companies on the procedures, methods, and practices to be followed in cases of ethical rule violations.
Report (Whistleblowing)	Refers to the sharing of observations and concerns regarding actions that are suspected to constitute or may constitute a violation of legislation, the Batıçim Code of Business Ethics and Working Principles, or relevant internal policies, procedures, regulations, or other internal rules, in accordance with the Batıçim Code of Business Ethics and Working Principles.
Whistleblower	Refers to the person who makes a report within the scope of the Batıçim Code of Business Ethics and Working Principles.
Business Partners	"Business Partners" include suppliers, distributors, dealers, authorized service providers, and other third parties with whom a business relationship exists, as well as any representatives, subcontractors, consultants, etc. acting in the name and on behalf of the Company, and the employees and representatives of the foregoing.
Retaliation	Retaliation, without being limited to the examples listed, refers to any direct or indirect adverse action an employee is subjected to—such as exclusion, harassment, discrimination, threats, psychological harassment, mobbing (workplace bullying), limitation of career opportunities, change of duties or workplace, negative performance evaluations, disciplinary sanctions, termination of employment, or deprivation of certain rights—due to making a report or complaint, exercising or intending to exercise a legal right, being consulted for their opinion or information in an Investigation or audit, or exercising freedom of association.
Investigation	Refers to the detailed and careful examination conducted to determine the truth regarding an incident, including cases where there is an allegation of a Disciplinary Offense, by reviewing the relevant actions and behaviors

4. RESPONSIBILITIES

All employees and managers at every level of Batıçim, including the Board of Directors and Senior Management, are responsible for complying with, implementing, and supporting this Policy. Batıçim expects and encourages all suppliers, contractors, and business and solution partners to act in compliance with this Policy.

Board of Directors and Senior Management

The primary responsibilities of the Board of Directors and Senior Management include:

- Approving and putting the Policy into effect, and approving any updates to the Policy when necessary;
- Ensuring that the Policy is reviewed regularly and, in any case, at least once a year, and updated when required;
- Ensuring the implementation of the fundamental principles set forth in this Policy;
- Assuming ownership of the Policy and encouraging its effective implementation;
- Ensuring the distribution of the Policy within Batıçim;

- Supporting ethical values and promoting them throughout Batıçim's culture;
- Coordinating and supervising the implementation of the Policy across Batıçim units and departments;
- Establishing notification, review, and sanction mechanisms in cases of non-compliance with this Policy and with the applicable legal rules and regulations regarding bribery and corruption referred to in this Policy; and
- Ensuring that fairness, impartiality, and transparency principles are observed in business processes and decision-making.

Within this framework, the Board of Directors and Senior Management adopt the principles of **"Fairness, Impartiality, and Transparency."**

Employees

Each employee is responsible for:

- Complying with this Policy;
- Completing the assigned training programs to ensure understanding and internalization of the Policy;
- Reporting incidents suspected to constitute a violation of the Policy to the Ethics Committee through the methods specified under this Policy; and
- Adopting transparency and ethical standards in relationships with business partners, contractors, and suppliers.

Within this framework, Employees adopt the principle of **"Transparency in Relationships."**

Ethics Committee

The primary responsibilities of the Ethics Committee include:

- Ensuring that applications are reviewed and/or investigated in a timely, fair, and sensitive manner, while also taking measures to protect the confidentiality and security of individuals reporting Policy violations;
- Conducting ex officio reviews in cases it deems suspicious;
- Completing the relevant review and reporting activities when instructed by the Board of Directors and Senior Management; and
- Ensuring that necessary measures are taken to remedy identified violations and to ensure compliance with this Policy.

5. IMPLEMENTATION

5.1. General Principles

Batıçim values creating an environment in which employees can freely express their thoughts without fear of retaliation. Therefore, Batıçim encourages and supports employees who exercise a legal right, or who directly or indirectly witness, suspect, or raise concerns about any unlawful activity or unethical conduct related to an employee or a Business Partner, as well as employees who have been subjected to retaliation or are at risk of retaliation for speaking up.

Batıçim adopts the principle of **"Zero Tolerance Against Retaliation."** Within this scope:

- Batıçim does not tolerate retaliation against a Whistleblower or any employee under any circumstances.
- Retaliation is considered a clear violation of the Batıçim Code of Business Ethics and Working Principles and is subject to Disciplinary Sanctions.
- The Company takes necessary measures to protect employees who have been subjected to retaliation or who are under threat of retaliation.
- Investigations conducted to examine retaliation allegations are confidential. Unless duly requested by judicial or administrative authorities, it is essential to protect the confidentiality of information that could reveal the identity of both the reporting employee and the reported person, including details such as work location, department, project, position, etc.
- Batıçim acts impartially and without prejudice toward both the reporting employee and the person reported.

Contracts executed with subcontractors providing various services within Batıçim (such as cleaning, security, etc.) are expected, to the extent necessary and applicable, to comply with the principles set forth in this Policy.

Batıçim protects all Whistleblowers even if the accuracy of the reported incident cannot be proven through an Investigation. However, if it is determined during an investigation that a Whistleblower has knowingly and maliciously made a false report, such employee may be subject to a disciplinary process and Disciplinary Sanctions. Therefore, it is extremely important that reports are based on observations and, where possible, supported by evidence.

Retaliation may be directed at a single Employee or multiple Employees, either collectively or independently. In cases where more than one Employee is subjected to retaliation or threatened with retaliation, a report from even one of these Employees is sufficient to initiate the Investigation process defined under this Policy.

Retaliation Violations Originating from Business Partners, Suppliers, and Contractors:

Batıçim monitors and evaluates risks related to Business Partners, suppliers, and contractors to ensure compliance with the Batıçim Code of Business Ethics and Working Principles and all related policies.

Compliance with this Policy by Business Partners is taken into consideration by Batıçim with respect to the continuation of existing business relationships and the establishment of future business relationships.

5.2. Measures the Company May Take Against Retaliation

If a report is made to Batıçim by an Employee within the scope of the Batıçim Code of Business Ethics and Working Principles and the Batıçim Anti-Bribery and Anti-Corruption Policy, Batıçim assesses whether the nature of the report involves a risk of retaliation and takes necessary measures to protect the employee.

An Employee's notification to the Company that they have been subjected to retaliation or are under threat of retaliation due to exercising a legal right, applying to an official authority or to Batıçim, providing

information/documents, giving testimony in an investigation, disciplinary process, or audit, exercising freedom of association, or similar reasons, is also considered a report.

In cases where there is a risk of retaliation or an explicit retaliation allegation, the claims are promptly reviewed and investigated within the scope of the Batıçim Code of Business Ethics and Working Principles, the Batıçim Anti-Bribery and Anti-Corruption Policy, and other relevant policies and procedures, and where necessary, referred to the Disciplinary Board.

During the investigation, Batıçim may implement the following measures ("Measures") to ensure that the employee is not subjected to any retaliation:

- Placing the employees involved in the report on administrative leave until the investigation is completed;
- Changing the workplace and operational assignment of the employees involved in the report;
- Changing shift schedules and working arrangements of the employees involved;
- Restricting the access of the employee alleged to have engaged in retaliation to Company resources and facilities;
- Seizing Company vehicles and computers of the employee alleged to have engaged in retaliation;
- Referring the Whistleblower to the Company Health Unit if psychological support is needed;
- Suspending the execution of an action or decision that is currently being applied to the employee as retaliation.

The above measures may be applied individually or collectively. The type and extent of the measures to be implemented are evaluated on a case-by-case basis.

The Ethics Committee is authorized to make decisions regarding these matters. In cases not explicitly addressed in this Policy, the Ethics Committee takes into consideration the United Nations International Human Rights Conventions, the International Labour Organization (ILO) conventions protecting fundamental employee rights, and relevant Good Practice Guidelines.

5.3. Employees' Rights and Obligations

Batıçim ensures, to the maximum extent permitted by law, the confidentiality of Whistleblowers, all related communications, and investigations conducted within this scope. Information, documents, and explanations related to a report are shared only with individuals who need to know for the purpose of properly investigating and addressing the reported matter.

An employee who believes that they have been subjected to retaliation or are under threat of retaliation may report the situation through the Reporting Channels listed below and request that necessary Measures be taken.

Employees who believe they have been subjected to retaliation due to making a report are obligated, where available, to provide information and documents supporting their allegations, to cooperate with the Batıçim units and authorities conducting the investigation, and to provide requested information and documents accurately.

Such reports must be made within six (6) months following the occurrence of the retaliation or retaliation threat, or from the date the threat has ceased.

5.4. Reporting Channels

Batıçim Employees, Business Partners, suppliers, and contractors may report any situation they believe constitutes a violation of the Anti-Retaliation Policy through the following Reporting Channels. These channels are not limited to those listed below; employees may also report to their Immediate Managers or to investigation authorities with whom they are in contact during an investigation, disciplinary process, or audit.

If employees have any hesitation prior to making a report, they may contact the Ethics Committee to obtain information about the process.

As explained in detail in the Batıçim Code of Business Ethics and Working Principles, a Whistleblower has the right to remain anonymous by not sharing their name and contact information when submitting a report.

Managers are obliged to immediately report any retaliation allegations received from their subordinates to the Ethics Committee.

Ethics E-mail Address:

etik@batianadolu.com
Address:

Ankara Caddesi No: 335, Bornova / İZMİR

For the Attention of the Ethics Committee

Batıçim Batı Anadolu Çimento Sanayii A.Ş.

5.5. Investigation and Disciplinary Process

Investigations related to retaliation allegations are conducted by the Ethics Committee.

Investigations should be completed within thirty (30) business days. If this period is extended, the employee is informed accordingly.

If, as a result of the investigation, it is concluded that the alleged conduct constitutes retaliation, the Human Resources Department is notified in order to initiate a disciplinary process against the Employee alleged to have committed the retaliation, in accordance with the Batıçim Disciplinary Policy. The required disciplinary process is conducted by the Disciplinary Board, as applicable, in accordance with the Batı Anadolu Human Resources Handbook.

Batıçim protects Whistleblowers even if the accuracy of the incident cannot be proven through an investigation. However, if it is determined during the investigation that the Whistleblower knowingly and maliciously made a false report, a disciplinary process will be initiated against that Employee. Therefore, it is extremely important that reports are based on observations and, where possible, supported by evidence. Even in cases where it is determined that a Whistleblower knowingly and maliciously made a false report, retaliation against such individuals is unacceptable.

The decision rendered as a result of the investigation or disciplinary process is communicated to the Employee.

6. VIOLATIONS AND CONSEQUENCES

If there is an opinion or suspicion that an Employee or any person acting on behalf of Batıçim has acted in violation of this Policy, such matter must be reported to the Ethics Committee by the managers and employees who identify it, either via the e-mail address **etik@batianadolu.com** or, as specified in the *Code of Business Ethics and Working Principles*, by submitting a written petition.

Batıçim encourages an honest and transparent approach and supports any Employee or third party who raises concerns in good faith. Within this scope, notifications made to the Ethics Committee are treated as confidential. No Employee may be subjected to pressure or punishment for making a report to the Ethics Committee regarding any action they believe violates this Policy, nor may their scope of duties or workplace be changed for this reason without the written approval of the Ethics Committee.

If the reporting person is subjected to such treatment, they are required to notify the Ethics Committee accordingly.
In cases of actual or potential non-compliance with this Policy, the matter is reviewed by the Ethics Committee either ex officio or upon notification, and if inappropriate conduct is identified, the necessary sanctions are determined and implemented.

The Ethics Committee is established and operates in accordance with the *Code of Business Ethics and Working Principles*, which constitutes an annex to this Policy.

Contracts executed with companies from which goods and services are purchased or to which goods and services are sold, as well as with suppliers, contractors, business and solution partners, or individuals and entities acting on behalf of Batıçim, include provisions stipulating that, in the event of conduct, attitude, or activities contrary to this Policy, Batıçim reserves the right to unilaterally terminate the relevant activities and/or existing contracts for just cause. In the event of a Policy violation, such provisions are applied without exception.

This Policy is supported by the Board of Directors and Senior Management of Batıçim, and all Employees are expected to comply with these principles. Success in combating bribery and corruption depends on each Employee's adoption, implementation, and continuous review of this Policy.

7. EFFECTIVE DATE
This Policy shall enter into force upon approval by the Members of the Board of Directors.

8. ENFORCEMENT
This Policy shall be enforced upon approval by the Members of the Board of Directors.

9. RELATED DOCUMENTS
- Batıçim Code of Business Ethics and Working Principles
- Batıçim Human Rights Policy
- Universal Declaration of Human Rights
- United Nations Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights