

Zorlu Enerji Whistleblowing Mechanism

At Zorlu Enerji, as a group company of Zorlu Holding, we are committed to upholding the highest standards of transparency, accountability, and ethical conduct. In line with our corporate governance principles and sustainability commitments, we have implemented a structured **Whistleblowing Mechanism** to enable employees and stakeholders to report any breaches of Zorlu Holding Ethical Principles in a safe, confidential, and retaliation-free environment.

1. Dedicated Oversight Body

The whistleblowing process is managed by an independent and empowered **Audit Group Presidency** within Zorlu Holding. The Presidency is responsible for receiving, reviewing, and concluding on all reported cases of ethical misconduct and operates with full autonomy, reporting directly to **Zorlu Holding Board of Directors**.

2. Independent Reporting Channel

Secure and accessible reporting channels are made available to all internal and external stakeholders. To ensure impartiality and trust, Zorlu Holding evaluates the engagement of **independent third-party service providers** for handling submissions, where applicable.

3. Anonymous Reporting

Reports can be submitted **anonymously**, without requiring the discloser to reveal their identity. All reports are assessed on the basis of content and merit, regardless of whether the source is known or anonymous.

4. Confidentiality

All reports are treated with the utmost **confidentiality**. The identity of whistleblowers and the content of the reports are only accessible to authorized individuals and are never disclosed to third parties without consent. Appropriate technical and organizational measures are in place to safeguard the integrity and privacy of the information shared.

5. Zero Tolerance for Retaliation

Zorlu Holding follows a strict **zero-tolerance policy against retaliation**. Individuals who raise concerns or participate in investigations are protected from any form of discrimination, harassment, or adverse consequences. Any attempt at retaliation is itself treated as a serious violation of our Ethical Principles.

6. Awareness and Training

To ensure effective use of the whistleblowing mechanism, all employees are provided with **onboarding and periodic training**. Awareness is maintained through internal communication platforms, and detailed guidance on the process is readily available.

7. Investigation Process

All reports are:

- Initially assessed and categorized by the **Audit Group Presidency**,
- If deemed credible, investigated through a structured, **impartial and evidence-based process**,
- Concluded with appropriate disciplinary or corrective actions, if necessary.

Throughout the process, **due process, fairness, confidentiality, and non-retaliation principles** are strictly upheld.