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OPET
WHISTLEBLOWING POLICY

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1. Purpose and Scope

The purpose of this Whistleblowing Policy (“the **Policy**”) is to encourage employees and all stakeholders of Opet, to report any activity that is considered or suspected to be illegal or misconduct and therefore in violation of applicable laws and/or the Opet Code of Ethics and relevant policies. It also aims to clearly and explicitly state that Opet employees who make notifications in good faith, as well as individuals who contribute to the investigation process, are protected against any potential acts of retaliation.¹

All employees and managers of Opet shall comply with this Policy, which is an integral part of the Opet Code of Ethics.

This policy has been prepared in accordance with the Code of Ethics and Values of Opet's Principal Shareholders.

2. Definitions

“**Authorized Person(s)**” mean the terms defined in Article 4.3

“**Business Partner**” includes suppliers, distributors, retailers authorized services and other third parties with whom the company has a business relationship and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company, as well as their employees and representatives.

“**Dashboard**” means the term defined in Article 4.3.

“**Dashboard Users**” means the term defined in Article 4.3.

“**Disciplinary Penalty**” refers to the type of punishment imposed for breach of employment contract, and/or a behavior that constitutes a violation of applicable legislation and/or a breach of Opet Code of Ethics, related policies, procedures, guidelines, circular notes, and all applicable regulations.²

“**Fraud**” means any intentional act or omission to deceive others for unlawful gain or to cause loss, including the misuse of one’s position for personal or corporate benefit through the misapplication of the organization’s resources or assets.

“**HR**” means Opet People and Culture Leadership

“**HR Subject**” means the term defined in Article 4.6.

“**Internal Audit**” means Opet Internal Audit Leadership.

“**Investigation**” means a detailed and careful examination of relevant actions and behaviors conducted to ascertain the facts of a matter, including but not limited to cases where a disciplinary offense is alleged.

“**Line Manager**” means the primary manager with whom the employee is directly affiliated.

“**Notification**” means sharing observations and concerns about actions which are suspected to violate laws, internal arrangements such as Opet Code of Ethics, relevant internal policies, procedures, and regulations according to this Policy.

“**Opet**” means all companies controlled solely or jointly by Opet Petrolcülük A.Ş. and Opet Petrolcülük A.Ş., either directly or indirectly by holding 50% or more than 50% of their shares.

“**Principal Shareholders**” refers to Türkiye Petrol Rafinerileri A.Ş. and Öztürk Yatırım ve Turizm A.Ş.

“**Reportable Matter(s)**”, mean the term defined in Article 4.1

“**Retaliation**” means any negative act—such as demotion, disciplinary action, dismissal, salary reduction, job or shift reassignment—carried out to penalize a Whistleblower or any individual who contributes to an Investigation (e.g., by providing information or acting as a witness), as a result of their involvement in the reporting or investigation process.

“**The UN Global Compact**”³ is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation.

¹ For further details, please refer to the Opet Anti-Retaliation Policy.

² See Opet Disciplinary Policy for details.

³ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption.

“**Whistleblower**” means the person who reports notification. This definition covers persons who are or have been employed at Opet, Opet clients, Business Partners and all other stakeholders.

3. General Principles

Opet attaches great importance to being in full compliance with the applicable laws, international conventions of the countries in where it is located, and the UN Global Compact, performs its activities with integrity and according to the highest ethical standards, and supports the culture of “open communication” and “accountability” in order to prevent unethical or illegal actions.

For this reason, Opet encourages its employees who directly or indirectly witness an illegal or unethical activity performed by an employee or a Business Partner or who obtain information about such a situation through legal channels, or who suspect such a situation, to express their concerns, and encourages its stakeholders to do so.

Opet carefully evaluates all reported Notifications and aims to investigate alleged violations as explained below. In this regard, all investigations will be conducted as soon as possible after receipt of the Notification, taking into account the results of the preliminary assessments.

4. Application of the Policy

4.1. Reportable Matters

Any illegal or unethical behavior or activity which are listed under the headings below (including but not limited to them) that has occurred in the past, may be occurring at the time of the Notification, or is expected to occur in the future may be the subject of a Notification⁴.

i. Unfair Practices Against Employees:

Opet provides a safe, peaceful and professional working environment for its employees. Therefore, any action against Opet employees which contradict with the regulations, Opet Code of Ethics or relevant policies and safe and peaceful work environment, is not tolerated.

ii. Acts Against the Interest of the Company:

While performing their duties, all Opet employees act according to our fundamental values and Opet Code of Ethics and avoid behaviors and activities that may cause material and/or moral harm to Opet. This can only be achieved when all employees internalize and maintain integrity, honesty, responsibility, trust and respect, which are Opet’s fundamental values. Therefore, any action by Opet employees that violates our fundamental values shall not be tolerated, regardless of the employee’s seniority or roles.

iii. Noncompliant actions of Business Partners:

Opet monitors and evaluates the risks associated with its Business Partners in order to ensure compliance with the principles outlined Opet Code of Ethics and related policies, in particular Opet Supply Chain Compliance Policy. We do not tolerate any behavior by our Business Partners that violate our Code of Ethics and related policies.

iv. Private Law Breaches:

Opet complies with the regulations in every country where it operates, and in cases where such regulations are unclear, encourages to consult experts to collect information, and expects its employees to act according to the Opet Code of Ethics. The violation of local and or international laws including but not

⁴ Customer complaints about the products and services of Opet are not covered by this Policy if they are not a Reportable Matter at the same time.

limited to sanctions and export controls, fraud, anti-bribery and corruption activities, prevention of laundering proceeds of crime and financing terrorism, protection of competition and personal data, and Capital Market law is not tolerated.

Each of the matters explained in paragraphs (i), (ii), (iii) and (iv) above shall be referred to as “Reportable Matter” alone and as “Reportable Matters” together.

4.2. Notification Methods

The Koç Group Ethics Hotline, which is operated by independent service providers and available 24/7, is the main reporting method for reporting a Reportable Matter. Koç Group Ethics Hotline can be reached by:

- Via phone numbers 0850-577-1926 or 0850-220-3845⁵;
- Through a web-based reporting system at www.koc.com.tr/ihbarbildirim.

In addition to the above channels, Whistleblowers may use the following alternative methods below to raise their concerns:

- If the Whistleblower is an Opet employee on the date of the report, they may contact their Line Manager.
- They may report their concern directly to Opet Internal Audit Leadership or Opet Legal and Compliance Leadership⁶.

If an employee at any level becomes aware of a Reportable Matters directly, and/or if someone else informs him/her about a Reportable Matter , he/she is expected to report the situation to Opet Internal Audit Leadership, or to Opet Legal and Compliance Leadership in the case of Private Law violations to ensure that the report is handled in accordance with this Policy and that all information is consolidated as soon as possible.

4.3. Global Incident Dashboard

All Reports are consolidated in the Global Incident Dashboard (“**Dashboard**”) by the Dashboard Users (defined below) regardless of the Notification method used. Koç Holding Internal Audit Leadership, Koç Holding Legal and Compliance Leadership, Opet Internal Audit Leadership, and Opet Legal and Compliance Leadership have authorization to access this system. The data in the Dashboard reported by a Whistleblower cannot be modified or deleted by the Dashboard Users. Dashboard Users can view, sort and/or monitor these reports. In addition, the Dashboard automatically consolidates the reports using the following information and prepares them for pre-assessment:

- Date and time of the report,
- Whistleblower information (*if available*),
- Related Opet company name, location, Leadership and employee,
- Date, time and area of the incident,
- Detailed explanation provided by the Whistleblower

In order to ensure confidentiality and to protect the Whistleblowers, access to the Dashboard is granted only to authorized personnel within Opet Internal Audit Leadership or Opet Legal and Compliance Leadership (“**Dashboard Users**”) except for circumstances specifically regulated in the Principal Shareholders’ Whistleblowing Policies. Dashboard Users perform an independent duty, and the reports shall be reviewed by persons who do not have any conflict of interest.

⁵ Information on phone numbers, the countries within scope, and the languages in which services are provided is available at koc.com.tr/ihbarbildirim

⁶ If a Report is sent to Opet Internal Audit Leadership or Opet Legal and Compliance Leadership, it must be ensured that the notifications are recorded in Global Incident Dashboard.

Opet Internal Audit Leadership and Opet Legal and Compliance Leadership shall periodically analyze the data (e.g. the type and frequency of the incidents, the Leaderships which are regularly reported, etc.) in the Dashboard and work with the relevant leaderships to ensure that the necessary measures are taken to address the relevant compliance risks and improve compliance deficiencies.

Opet Internal Audit Leadership and Opet Legal and Compliance Leadership report the activities carried out, including the procedures performed and the decisions of the Ethics Committee, to the Opet Board of Directors and, if requested, to the Principal Shareholders on a semi-annual basis. In addition, in order to assess the effectiveness of the work carried out under the Opet Anti-Retaliation Policy, the Internal Audit Leadership and/or the Legal and Compliance Leadership responsible for conducting the investigation maintain a list of the Whistleblower and other relevant individuals. The measures taken against retaliation and the evaluation activities performed are regularly reported to the Ethics Committee.

4.4. Confidentiality, Anonymity and Integrity

Opet respects the preference of Whistleblowers and other individuals who contribute to the investigation process to remain anonymous. In this context, all information reported through the Ethics Hotline and other alternative channels, as well as all investigation activities carried out, shall be kept confidential to the extent permitted by law⁷.

Accordingly, to the extent permitted by law, the details of a Notification and any other information gathered during an Investigation will be shared with persons who are authorized to (i) investigate, (ii) evaluate the subject, and (iii) take action if their name is not mentioned in the Notification. For the avoidance of doubt, any person whose name is mentioned in a Notification is not authorized to have access to or be involved in the assessment or Investigation process.

While it is recommended that the leadership conducting the Investigation informs the Whistleblower of the progress and outcome of the Investigation, it may be decided, if necessary, to conduct the process in complete confidentiality.

Anyone who provides information during an Investigation is also required to maintain the confidentiality of the information they have provided, or of any information they may learn during the Investigation. Similarly, they are obliged to protect and respect the existence of the Investigation, its confidentiality, and the individuals involved in the process.

A Whistleblower has the following options when reporting an incident:

- i. Withhold their name and contact information in order to remain anonymous,
- ii. Provide his/her name and contact information and allow this information to be communicated only to the authorized persons. In this case, the relevant authorized persons may contact the Whistleblower directly to request any information that is needed during an Investigation.

4.5. Zero Tolerance to Retaliation

Opet encourages and supports the reporting of concerns. It is essential that Whistleblowers and other individuals who contribute to investigation activities feel comfortable and secure, and do not fear any adverse impact on their professional lives, as long as they act honestly and in good faith. Accordingly:

- o Any form of Retaliation shall be considered a direct violation of the Opet Code of Ethics, the Opet Whistleblowing Policy, and this Policy, and shall be subject to Disciplinary Penalties⁸.
- o Opet makes proactive efforts to protect Whistleblowers and individuals supporting Investigations—even if the facts could not be confirmed—provided that the Notification was

⁷ See “4.2 Notification Methods” for alternative whistleblowing channels.

⁸ For further details, please refer to Opet Disciplinary Policy and Workplace Policy.

made in good faith, with reasonable grounds, and not with intent to harm, gain advantage, or cause damage.

- Necessary measures are taken to identify and protect individuals who have been subjected to or are at risk of Retaliation, including Whistleblowers and those contributing to Investigations (e.g., witnesses).
- Unless formally requested by judicial or administrative authorities, the identity and identifying information (such as location, Leadership, or project details) of the Whistleblower, the reported individual, and others involved in the Investigation process shall be kept confidential.
- The contracts signed with Business Partners are expected to align with the principles set forth in this Policy to the extent necessary and applicable.

However, if it is determined during an Investigation that a Whistleblower or any other related individual has deliberately and maliciously provided false information, such individuals may be subject to disciplinary proceedings and Disciplinary Penalties. Therefore, it is extremely important that Notifications are based on observations and, where possible, supported by evidence.

For further details, please refer to the Opet Anti-Retaliation Policy.

4.6. Investigation Process

All reports submitted through the Hotline and other alternative channels are evaluated as soon as possible by Opet Internal Audit Leadership and/or Dashboard Users comprised of Opet Legal and Compliance Leadership according to their subject matter. The purpose of the evaluation is to verify the subject matter of the Notification and to determine whether the information provided is reliable.

In accordance with the Whistleblowing Policies of the Principal Shareholders, as a result of the pre-assessment, if the relevant subject is a subject within the authority of Opet, Opet Dashboard User shall be authorized to investigate the subject in depth, in other words, to decide whether an Investigation should be started or the case should be closed. If there is a need to conduct an Investigation, then Opet conducts the investigation in line with its internal procedures.

If the relevant matter is not within the jurisdiction of Opet, it is referred to the Principal Shareholders.

In this process, any information obtained through unlawful means by the Whistleblower or other individuals who contribute to the investigation (if any) shall not be taken into consideration during the Investigation.

Except for the circumstances specifically regulated under the Principal Shareholders' Whistleblowing Policies, if the Investigation is being conducted by the authorized functions within Opet, the leadership primarily responsible for the Investigation shall inform the other relevant leadership(s) and obtain their input (if any) before finalizing the Investigation and issuing the final report. In such cases, the consulted leadership shall provide their recommendations as soon as possible and, in any event, in a manner that does not cause any delay in the process.

Depending on which leadership holds responsibility for the Investigation, Opet Internal Audit Leadership or Opet Legal and Compliance Leadership may, when necessary and throughout the Investigation process, (i) request support/contribution from one another, and (ii) consult other leaderships for professional expertise. Opet People and Culture Leadership shall particularly provide input during the Investigation stage when the incident involves an alleged violation by an employee. A lawyer within the Opet Legal and Compliance Leadership shall particularly support the Investigation when the alleged incident concerns a breach of applicable laws (e.g., criminal law, labor law, etc.) and shall also be responsible for ensuring that any applications/notifications to relevant authorities, deemed necessary, are made in compliance with applicable laws.

If the report prepared as a result of the Investigation includes a recommendation for imposing a Disciplinary Penalty, the matter shall be submitted to the Opet Ethics Committee based on the nature of the incident and the individual subject to the investigation.

4.6.1. Investigations Conducted by People and Culture Leadership (“HR”)

In accordance with the Opet Disciplinary Policy, if the subject matter relates to the employee’s incompetence (i.e. low performance, low productivity, failure to meet the requirements of the duty assigned) (“**HR Subject**”), his/her managers in the relevant business unit or his/her Line Manager shall forward the matter to HR, and request that an investigation be conducted. The HR is authorized to determine whether to impose a Disciplinary Penalty, and if imposed, the type of Disciplinary Penalty, and has right to escalate the issue to the Ethics Committee when necessary. All other notifications and investigations concerning employees shall be conducted, depending on the nature of the matter, by Opet Internal Audit Leadership or Opet Legal and Compliance Leadership.

Disciplinary Penalty imposed by HR shall be periodically reported to the Ethics Committee every three months or more frequently based on the recurrence rate of the cases.

4.6.2. Ensuring Impartiality in Investigations and Authority to Act

If deemed necessary for the integrity and effectiveness of the investigation, measures under the Opet Anti Retaliation Policy may be implemented to protect the employees subject to the report and other individuals contributing to the investigation process.

In the case of Investigations conducted within Opet, if there are valid reasons that could affect the neutrality and independent decision making in the case of the existence of a hierarchical or functional conflict of interest, and/or if the name of the authorized Leadership is mentioned in the Notification, or if it is necessary to conduct a comprehensive Investigation, or if the Investigation is conducted in a location different from the country where Opet headquarter is located (e.g need for quick and efficient Investigation, special expertise, language barriers etc.), the Investigations may be conducted by independent third party service providers. In such a case, the opinions of the Principal Shareholders shall be obtained in accordance with the Reportable Subject when deciding to procure outsource services.

4.6.3. Investigation Reports and Disciplinary Decisions

During the investigation, if there is a determination that a Disciplinary Penalty may be imposed, it is essential to obtain a written statement from the employee concerned before the final Investigation Report is prepared.

The Investigation Report shall be submitted by the authorized leadership to the Ethics Committee for a decision. Disciplinary Penalties imposed by HR in accordance with Article 4.6.1 shall be regularly submitted to the Ethics Committee for their information.

In addition, to assess the effectiveness of actions carried out under the Opet Anti-Retaliation Policy, Opet Internal Audit Leadership and/or Opet Legal and Compliance Leadership responsible for the investigation shall maintain a list of the Whistleblower and other relevant individuals, and regularly report the measures taken against retaliation and the evaluations conducted to the Ethics Committee.

4.7. Expectations from the Whistleblowers

In order to ensure that the “Disclosure Matter” is clearly understood clearly and can be properly and fairly assessed, the Whistleblower is expected to provide sufficient and as detailed information as possible. Therefore, Notification should, as far as possible, include answers to the following questions:

- Names of the suspect(s),
- Detailed information on the matter;
- When/where/with whom did the incident take place?
- How many times has it happened? Is it recurring? When did it happen for the first time?
- If it has not occurred yet, when is it expected to occur?
- When did the Whistleblower become aware of the issue?
- Who else is aware of the problem? If the managers are aware of the problem, have they taken any action to prevent it?
- Did the Whistleblower directly witness the incident, or hear about it from someone else?
- Did the Whistleblower inform his/her line managers? If not, why?
- Is there any evidence of the reported concern?

5. Authority And Responsibilities

All employees and managers of Opet are responsible for complying with this Policy, implementing and supporting Opet’s procedures and controls in accordance with the requirements of this Policy. Opet takes necessary steps to ensure that all its Business Partners are informed about this Policy.

If there is a discrepancy between the local regulations applicable in the countries where Opet operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local regulations.

Opet employees may contact Opet Internal Audit Leadership and Opet Legal and Compliance Leadership for their questions regarding this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If any third party that is expected to comply with this Policy acts in violation of this Policy, the relevant agreements may be terminated.

6. Revision History

This Policy entered into force with the Board of Directors’ Resolution dated 15.04.2022 and was updated with the Board of Directors’ Resolution dated 06.02.2026. Opet Legal and Compliance Leadership is responsible for updating the Policy.

Revision	Date	Comment
No:1	10.06.2024	The name of the Legal and Compliance Group Directorate has been revised.
No:2	12.05.2026	Definitions have been aligned with the Anti-Retaliation Policy, and the procedures related to the investigation process have been revised for improved clarity. Additionally, the unit names have been revised.