GLOBAL WHISTLEBLOWING POLICY

1. GENERAL PRINCIPLES

Arçelik is committed to sustain the highest possible ethical standards and legal conduct within the Company’s business operations. In order to maximize and maintain the Company’s ability to effectively manage the reporting mechanism, any employee who believes reasonably that a potential breach of Global Code of Conduct and related Code Policies exists in the work place, then he or she should report this issue immediately to the ethics hotline.

The whistleblowing mechanism can be used covering possible improprieties to unethical acts such as;

- Breach of Global Code of Conduct and related Code Policies,
- Unlawful acts or orders requiring violations of a law, mismanagement, abuse of the current job position, significant hazards to public health or safety,
- Failures to comply with statutory obligations in countries that Arçelik has operations,
- Any other activity which subverts the Company’s operations.

2. PRINCIPLES

a. Definition of Whistle-blower

A whistle-blower is anyone who communicates an allegation or any other information indicating that acts which are incompliant to the Global Code of Conduct and related Code Policies.

b. Protection of the Whistle-blowers

The harassment or victimization of anyone raising a concern is not tolerated and individuals making a disclosure will retain their anonymity unless they agree otherwise. Arçelik will not try to discover the identity of the anonymous whistle-blowers.

Allegations and concerns notified anonymously shall be considered by Compliance Officers fairly and properly in accordance with the Global Code of Conduct and related Code Policies.
Whistle-blower’s identity protected by the Compliance Officers unless;
- The whistle-blower agrees to be identified,
- Identification is essential to allow the appropriate law enforcement officials to investigate the issue or answer the disclosure efficiently,
- Identification is needed by law.
Compliance Officers are authorized to protect the identity of the whistle-blowers even from the Ethics Committee members if such protection is requested.

We are fully committed to protect whistle-blowers and there will be zero tolerance towards to the acts aimed to put whistle-blowers in unfavourable positions by any act or omission regarding the whistleblowing, in particularly in relation to:
- employment procedure;
- education, training, or professional development;
- promotion at work, evaluation, acquiring or loss of the title;
- disciplinary measures and penalties;
- working conditions;
- termination of employment;
- earnings, compensation of earnings;
- payment of the bonuses and of the retirement gratuity;
- disposition or transfer to the other work assignments;
- failure to take measures to protect because of the harassment by other persons;
- a referral to the mandatory medical examination or referral to the examination to assess the work ability.

c. Reporting Channels

Allegations or concerns can be reported through the Ethics Hotline, which is administered by an independent, third-party provider with confidentiality. Ethics Hotline service providers informs only related Compliance Officers to enable proper handling of the concern.

When reporting via the Ethics Hotline, whether via the Web or the Phone, the informant may;
- Want not to share his/her name and contact information to remain anonymous,
- Share his/her name and contact information with the service provider and allow the information to be communicated to Arçelik. In this case, Arçelik can contact the informant directly to request any information needed during the investigation.
- Want to share his/her name and contact information only with the service provider, but not to share with Arçelik. In this case, Arçelik can contact the service provider to request additional information when needed.

The reporting channels are e mail (arcelikas@ethicsline.net), webtool (www.ethicsline.net) and telephone numbers specifically assigned to production countries.
3. PROPER USAGE OF THE ETHICS HOTLINE

It should be noted that the Ethics Hotline is not an Emergency Service. It must not be used to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If emergency assistance is required, local authorities and Company representatives must be contacted.

4. AUTHORITY AND RESPONSIBILITIES

This policy is published by Arçelik Legal and Compliance Department, and the Company is responsible for ensuring the compliance with the Policy by all its employees. Any violation of this Policy will result in disciplinary action, up to and including termination of employment.

Compliance Officers are employees of the Company appointed by the Chief Legal and Compliance Officer as being responsible for monitoring the Company’s operations pertaining to this Policy.
This Policy will be periodically reviewed by the assigned Arçelik Legal and Compliance Department to ensure compliance with new or revised laws and regulations.

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