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A-Purpose: To define the principles regarding the safe, confidential and non-retaliatory reporting of situations considered to be contrary to ethical principles, legal regulations, human rights or company rules during company activities by employees and relevant stakeholders, and the evaluation of reported issues.

B-Scope: Covers all Flexati employees and stakeholders associated with the company.

C-Responsibles: All employees

D-Definitions:

Whistleblowing / Reporting: Reporting unethical behaviors, legal violations, human rights violations, occupational health and safety risks or practices contrary to company rules.

Whistleblower: A person who makes a report in good faith without seeking personal benefit.

E-Application:

1.Reporting Channels

1.1. An ethics line (whistleblowing line) is available within the company, and whistleblowing and reporting can be submitted through the digital reporting system accessed by scanning the QR codes located within the factory premises and procedure using a mobile device.



1.2. Reports submitted through the system accessed by scanning the QR code are recorded and forwarded to the Human Resources department.

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1.3. Reports may be submitted anonymously or with identification.

1.4. In addition to the digital reporting system, whistleblowing and reports may also be submitted via the e-mail address HR@flexati.com or through the Suggestion System Box and Suggestion Form (EHS_FR_0009).

1.5. Access to the related mechanisms is provided in an easy and continuously accessible manner for all employees and relevant stakeholders; QR codes are positioned in common areas. In addition, Suggestion Boxes are located in common areas and the Suggestion Form can be obtained both physically and digitally.

1.6. The ethics line and reporting mechanism are regularly announced to employees through orientation trainings, periodic internal communication announcements and internal company communication channels.

1.7. All employees and relevant stakeholders have the right to use these mechanisms freely and without fear of retaliation.

2.Reporting Subjects

- 2.1. Practices contrary to legal regulations
- 2.2. Behaviors contrary to ethical principles
- 2.3. Human rights violations
- 2.4. Discrimination, harassment and mobbing
- 2.5. Improper use of company resources
- 2.6. Information security violations (data privacy, unauthorized access, information leakage, etc.)
- 2.7. All kinds of misconduct and conflicts of interest, including corruption and bribery
- 2.8. Violations related to working conditions (working hours, remuneration, social rights, leaves, etc.)
- 2.9. Occupational health and safety (OHS) risks and violations

3.Confidentiality and Protection

3.1. The identity of reporting persons is kept confidential and this information is shared only with authorized persons.

3.2. Reports are evaluated by a limited number of persons authorized by Human Resources, the Ethics Committee and/or top management. Access to report contents by unauthorized persons is strictly prohibited.

3.3. All information and documents related to reports are protected in accordance with data privacy and information security rules and shared only with relevant persons when necessary.

3.4. No retaliation, discrimination or any sanction may be imposed against employees making reports in good faith.

3.5. Anonymous reports are also evaluated with the same diligence and necessary processes are carried out to ensure the effective investigation of such reports.

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4.Evaluation Process

- 4.1. Reports are recorded by Human Resources.
- 4.2. Depending on the nature of the issue, evaluations are carried out together with the relevant departments.
- 4.3. Corrective and preventive actions are initiated where deemed necessary.
- 4.4. The process is carried out in accordance with confidentiality principles.

5.Malicious Reports

- 5.1. In cases where knowingly false, misleading or defamatory reports are identified, relevant legislation and company rules shall apply.

6.Improvement Process for Discrimination and Harassment Reports

In reports related to discrimination, harassment, mobbing and similar issues, the process is not limited only to recording and investigation. Where deemed necessary, improvement actions aimed at eliminating the effects of the incident and protecting and supporting the relevant persons are planned and implemented.

Within this scope, the process is carried out proportionally by considering the nature, scope and effects of the incident. Depending on the investigation results, appropriate measures for the protection and support of the victim are evaluated and necessary actions are taken. Communication with the parties is conducted in compliance with confidentiality principles and only to the extent necessary.

In order to prevent the recurrence of similar incidents, corrective and preventive actions are determined and implemented where necessary. The appropriateness and effectiveness of the actions taken are regularly monitored, and additional measures are planned if needed.

Investigations conducted within the scope of the process, actions taken and monitoring results are recorded and retained in accordance with the relevant procedures.

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