

ÇANAKKALE MOTORWAY AND BRIDGE

**DISCIPLINARY POLICY
ON ETHICAL AND
COMPLIANCE VIOLATIONS**



1915 ÇANAKKALE

INTRODUCTION

It is one of our Company's top priorities that our employees work in a safe, respectful, and efficient working environment. The Disciplinary Policy established in this regard sets out the principles for maintaining order, cooperation, and professional standards in the workplace. The Policy clearly defines employees' rights and responsibilities while providing a transparent framework for addressing potential disciplinary violations. This helps ensure that workplace conduct aligns with our corporate values and promotes a safe, fair, and sustainable working environment.

WHAT IS THE PURPOSE OF THIS POLICY?

This Disciplinary Policy ("Policy") has been established to define the scope of conduct that ÇOK A.Ş. considers to be serious violations with consequences, to set forth the principles governing the evaluation of such conduct, and to establish the fundamental principles and standards for the sanctions that may be applied. The primary objective of this Policy is to ensure a fair, transparent, and consistent approach for all employees throughout the disciplinary process.

This Policy is also an integral part of the employment contract and other agreements entered into between ÇOK A.Ş. and its employee.

WHO IS AFFECTED BY THIS POLICY?

ÇOK A.Ş. employees and managers are responsible for acting in accordance with this Policy and aligning their business processes with the provisions of this Policy.

GENERAL PRINCIPLES

Providing a fair, respectful, and inclusive working environment for employees is one of the company's basic principles. Disciplinary processes are conducted solely on the basis of the nature and seriousness of the proved violation or strong suspicion in question, without discriminating against any employee based on their personal characteristics, opinions, or beliefs.

The investigation of incidents subject to disciplinary proceedings is conducted in accordance with the principle of confidentiality, legal regulations, and ethical disclosure mechanisms.

The disciplinary process begins with the assessment of the alleged violation; the necessary investigations are conducted in accordance with the principles of impartiality and confidentiality.

Employees have the duty to respond to evaluations concerning them and to provide the requested information and documents accurately, completely, and on time. This duty is considered a fundamental responsibility in ensuring that the disciplinary process is conducted in a healthy and fair manner.

Sanctions are determined in accordance with the principle of proportionality, considering the severity of the violation and the employee's past disciplinary record, and the decision shall be communicated to the employee in writing.

In order to ensure the effectiveness of this Policy, employees are provided with the necessary information and awareness training on a regular basis.

Disclosures made in accordance with the Ethical Disclosure Policy are carefully evaluated, and if necessary, an investigation into the suspected violation is conducted.

Necessary measures are taken to prevent any conflict of interest between the parties involved in the reporting and those conducting the investigation. In addition, if the anti-retaliation rules are violated as a result of the reporting, the sanctions set forth in this Policy are applied.

IMPLEMENTATION OF THE POLICY

The Ethics and Compliance Committee is responsible for the implementation of this Policy.

The evaluation of reports submitted under the Ethical Disclosure Policy and their resolution in accordance with the ÇOK A.Ş. Disciplinary Policy shall be the responsibility of the SPV Directors, in light of the advisory decisions of the Ethics and Compliance Committee.

The Ethics & Compliance Committee has the right to conduct any investigation it deems appropriate regarding the operation of the Disciplinary Policy or to authorize third parties to conduct such investigations. In this context, the Committee or the authorized third party may request information and documents from all employees within the scope of its investigation and evaluation in accordance with the disciplinary investigation.

The Ethics & Compliance Committee, together with the SPV Directors, decides whether the evaluation process of the report should result in an internal investigation.

The Ethics & Compliance Committee may, as a result of any investigation, inquiry, or evaluation it conducts, recommend the following measures to the relevant employees, Third Parties, and stakeholders, including but not limited to:

- Issuance of a verbal warning,
- Issuance of a written warning,
- Imposition of a disciplinary action involving an appropriate sanction,
- Changing the working conditions within ÇOK A.Ş., if necessary, in accordance with the provisions of the Labor Law and relevant national and international mandatory regulations,
- Introduction of additional obligations for investigation, audit, and reporting,
- Termination of the employment contract pursuant to the Labor Law and other applicable legislation,
- Termination of any business partnership, service, or supply relationship,
- Implementation of administrative and technical measures, where necessary, to prevent the recurrence of similar situations arising from the investigation, inquiry, or evaluation.

OUR REPORTING RULES AND DISCLOSURE CHANNELS

ÇOK A.Ş. commits to establishing a mechanism through which both employees and affected communities can report their complaints without fear, and to ensuring that these complaints are resolved in a timely and effective manner.

ÇOK A.Ş. Management undertakes to report any illegal actions carried out by security personnel to the authorities under all circumstances.

This Policy supports disclosing any actions believed to be inconsistent with applicable legislation or ÇOK A.Ş. Code of Ethical Conduct through the disclosure channels specified below:

Telephone: You may call [0212 800 65 81](tel:02128006581)

E-mail: You can send an e-mail to cok.ethics@speak-hub.com

Disclose Form: You can fill out the disclose form on www.speak-hub.com/cok-ethics

VALIDITY AND UPDATES OF THE POLICY

ÇOK A.Ş. ensures that of this Policy is the most up-to-date version in force and shared with publicly accessible resources. This Policy and its previous revisions, are retained indefinitely within ÇOK A.Ş. document management systems. ÇOK A.Ş. is responsible for ensuring that the current version of this Policy is in effect. In the event that an update is required, the Ethics and Compliance Committee is responsible for making the necessary revisions and for notifying all relevant parties affiliated with this Policy.

This Policy entered into force pursuant to the Board of Directors decision dated 17.09.2025.