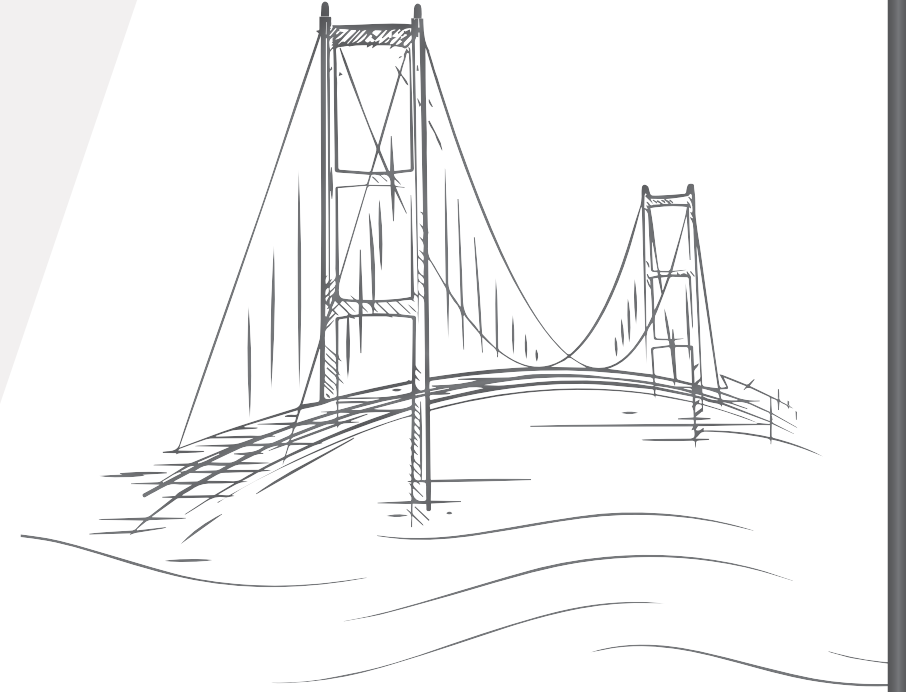


**ÇANAKKALE MOTORWAY AND BRIDGE**

**ETHICAL DISCLOSURE  
POLICY**



**1915ÇANAKKALE**

## INTRODUCTION

Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme Anonim Şirketi ("ÇOK A.Ş.") acts in compliance with all applicable national and international legislation in all its activities. In this regard, it expects all its stakeholders to act in accordance with ÇOK A.Ş. Code of Ethical Conduct, compliance policies, and all applicable legislation. ÇOK A.Ş. encourages disclosure of any unethical behavior or conduct that violates ÇOK A.Ş.'s internal rules or the law through the ÇOK A.Ş. Ethical Disclosure Hotline.

## WHAT IS THE PURPOSE OF THIS POLICY?

This policy is intended to provide information on the following:

- Who can report
- What can be reported
- How to report
- ÇOK A.Ş.'s responsibilities

## WHO IS COVERED BY THIS POLICY?

Anyone who is aware of or affected by any unethical or illegal situation suspected to have occurred within ÇOK A.Ş. is encouraged to report any such situation:

- Employees and Managers of ÇOK A.Ş.
- Suppliers of ÇOK A.Ş.
- Customers of ÇOK A.Ş.
- Other third parties (consultants, intermediaries, etc.)

## WHAT ARE OUR DISCLOSURE CHANNELS?

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

**E-mail:** You can send an e-mail to [cok.ethics@speak-hub.com](mailto:cok.ethics@speak-hub.com)

**Disclose Form:** You can fill out the disclose form on [www.speak-hub.com/cok-ethics](http://www.speak-hub.com/cok-ethics)

## WHAT SHOULD YOU REPORT?

### Issues That Can Be Reported to the Ethical Disclosure Hotline

- Corruption, bribery
- Conflicts of interest
- Abuse of trust, fraud, and fraudulent transactions
- Forgery of documents, false statements in physical or digital environments
- Cyber security
- Verbal or physical harassment
- Psychological harassment (mobbing)
- Gender-based discrimination, harassment, exploitation, violence, abuse
- Assault, injury
- Discrimination and retaliation
- Violation of occupational health and safety rules
- Child labor
- Violation of the right to form and join unions
- Forced labor
- Working hours and wages in violation of the law
- Waste management in violation of the law, practices causing water and air pollution.

- Violations of other local laws and international regulations similar to the above, as well as violations of ÇOK A.Ş. internal rules, resulting in financial, legal, ethical, and reputational risks for ÇOK A.Ş.

#### Issues That Are Not Appropriate for the Ethical Disclosure Hotline

- Promotion
- Annual leave
- Topics concerning lunch hall, service, etc.

If you have any requests, questions, or comments regarding these or similar employee rights, please directly contact your managers, human resources department, or the channels specified in the “Stakeholder Participation Plan” heading on the [www.1915canakkale.com](http://www.1915canakkale.com) website.

For reports of violations regarding the protection of personal data: You can use the “Application Form for the Exercise of Rights by Data Subjects” under the “Protection of Personal Data” heading on the [www.1915canakkale.com](http://www.1915canakkale.com) website.

The Ethical Disclosure Hotline is designed solely for reporting matters that may be unethical or unlawful. However, if you believe that an unlawful practice is being carried out in relation to the matters mentioned above, you may use the Disclosure Channels.

## WHAT SHOULD YOU PAY ATTENTION TO WHEN MAKING A REPORT?

Reporting persons are expected to provide sufficient and detailed information at the time of reporting.

Reports concerning ethical or compliance violations, whether directly observed or experienced, may not always be supported by clear evidence. However, all evidence that can be provided is important for the investigation and inquiry of the reported incident, its proper understanding, and its transparent, impartial, and fair assessment.

Therefore, reports should include the following information to the extent possible:

- The suspected ethical or compliance violation; where and when it occurred, whether it is ongoing,
- The names of the suspected person(s),
- When the reporting person became aware of the incident,
- Whether the incident is known to anyone other than the reporting person and, if so, whether any action has been taken,
- Whether there is any evidence and, if so, where it can be found.

In any case, reporting is encouraged even if this information is not complete or clear.

## OUR RESPONSIBILITY AS ÇOK A.Ş.

#### Confidentiality

ÇOK A.Ş. supports all employees or third parties acting on behalf of or for ÇOK A.Ş. in expressing their opinions and concerns in good faith. All reports made in this context are going to be kept confidential. ÇOK A.Ş. expects the same sensitivity regarding confidentiality from the reporting persons. Until the matter reported is resolved or ÇOK A.Ş. provides additional information on the matter, no information related to the report may be shared with anyone inside or outside ÇOK A.Ş.

#### Prevention of Retaliation

ÇOK A.Ş. works to ensure that reporting persons under this Policy are not subjected to any form of discrimination, mistreatment, social/psychological pressure, or any other form of retaliation and it takes great care to protect the physical and mental safety of reporting persons. ÇOK A.Ş. always supports ethical reporting made in good faith, with honesty and transparency, and protects reporting persons.

ÇOK A.Ş. maintains a zero-tolerance policy against any form of retaliation. ÇOK A.Ş. does not subject any employee to pressure, punishment, or retaliation of any kind for making an ethical or compliance report and does not tolerate such actions.

An employee who makes a report shall not be subject to direct or indirect retaliation, including but not limited to:

- Termination of the employment contract
- Changes to working conditions
- Suspension from work
- Forced paid or unpaid leave
- Any similar retaliatory action

Failure to comply with the rules regarding the prevention of retaliation by other employees constitutes a violation of this policy and the sanctions provided for in the ÇOK A.Ş. Disciplinary Policy shall apply.

## MANAGEMENT OF REPORTS

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ÇOK A.Ş. takes all necessary measures and exercises due care to receive reports, evaluate them in accordance with objective criteria, conclude them promptly, considering the time limits specified in the Stakeholder Participation Plan to the extent applicable to the relevant application, and inform the relevant persons.

The evaluation of reports made under this policy and their resolution in accordance with the ÇOK A.Ş. Disciplinary Policy is the responsibility of the Ethics and Compliance Committee.

## DOCUMENT UPDATE, STORAGE AND PUBLICATION

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ÇOK A.Ş. ensures that this Policy is the most up-to-date version in force and shared through publicly accessible resources. This Policy and all its previous versions are retained indefinitely within ÇOK A.Ş.'s document management systems. In case a revision to this Policy is required, the Ethics & Compliance Committee is responsible for conducting the necessary revisions and announcing the revision to all parties affiliated with this Policy.

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