REPORTING POLICY

Introduction

Limak is committed to conducting business with integrity, transparency, and accountability. A strong speak-up culture is essential to preventing and detecting misconduct, including bribery, corruption, fraud, financial misconduct, human rights Concerns, and other breaches of law, the Code of Ethics, or Company policies.

Limak has a Whistleblowing programme. This programme is open for both Employees and Business Partners. Employees must raise concerns if they observe suspicious behaviour that may constitute a Compliance Concern, without fear of retaliation. Business Partners are encouraged to do so.

Speaking up in good faith and at an early stage helps Limak address Compliance Concerns promptly and protect its people, operations, and reputation.

1. Purpose

Limak Group of Companies, including all joint ventures directly or indirectly controlled by Limak Holding A.Ș., (collectively we, us, our, Limak or Company) is committed to acting with integrity and conducting all of its business in an honest and ethical manner. This commitment applies to all business dealings and relationships around the world; we expect the same from our Employees.

This Policy explains how Compliance Concerns relating to Limak's business activities and relationships may be reported through the Limak Whistleblowing programme. It also sets out the Reporting Channels available, the standards expected of Employees and managers, and the protections that apply to those who speak up in good faith.

This Policy is designed to comply with the EU Whistleblower Directive on the protection of persons who report breaches of EU law. Where local national laws provide broader protections or stricter requirements than the Directive, those local statutory provisions shall take precedence.

This Policy applies to all Company Employees, whether permanent or temporary, wherever located. Where permitted by applicable law, the Whistleblowing programme is also available to former employees, contractors, suppliers, Business Partners, and other third parties who wish to report a Compliance Concern connected to Limak.

The Policy serves to facilitate reporting without fear of retaliation, so that our programme can alert the business to potential improper behaviours and deliver effective remediation.

Compliance with this Policy helps protect Limak and its Employees from potential breaches of laws and regulatory, financial and reputational risks.

2. Principles

Limak is committed to conducting its business fairly, with respect, honesty and integrity. Employees are expected to maintain high standards of ethical behaviour and transparency and shall speak up when they observe or believe a conduct may constitute a Compliance Concern. Compliance Concern or Concern refers to any behaviour by Employees or third-parties that may breach applicable laws, Limak's Code of Ethics ("CoE") or any related policies.

This Policy explains what should be reported, how reports may be made, and the responsibilities Employees and managers have to support a speak-up culture and prevent retaliation. It also explains how Concerns about retaliation or breaches of this Policy may be raised.

This Policy is a Reporting policy. It does not describe Limak's investigation procedures, disciplinary processes, or local grievance processes for routine employment matters unless those matters also involve a reportable Compliance Concern.

3. Definitions

In this Policy, the following capitalised terms have the meaning set out below.

Reporting Policy or Policy: Limak Group Reporting Policy.

Directive: Limak Group Allegations Case Management Directive.

Company: All companies in the Limak Group of companies, subsidiaries, affiliates and joint ventures directly or indirectly controlled by Limak Holding A.Ş.

Employee/s: Those who work for Limak in any capacity at any level whether permanent or temporary, wherever located. It includes directors, officers, agency workers, seconded workers, volunteers, interns, job applicants and former employees.

Business Partner: Any third party that has, or seeks to have, a business relationship with Limak or acts for, with, or on behalf of Limak, including customers, suppliers, contractors, subcontractors, consultants, agents, intermediaries, JV or consortium partners.

Reporter: Individual who raises a Compliance Concern by making a report using one of the Reporting Channels, irrespective of whether they are an Employee or third party.

Compliance Concern or Concern: Any behaviour by an Employee/s or third-party/ies that may breach applicable laws, Limak's Code of Ethics ("CoE") or any related policies.

Whistleblower Portal: Confidential reporting options offered by Limak through external provider (Case IQ), comprising toll-free telephone numbers, additional numbers where toll-free is not available and online web. These can be found at https://limakallegationcms.caseiq.app/portal.

Reporting Channels: Comprise the confidential Whistleblower Portal, a Reporter's manager, the superior of their manager, the HR function or the Limak Legal and/or Compliance Office.

4. Whistleblowing/Reporting

To support a broad culture of open communication and reporting, Limak has created a Whistleblowing programme. This provides several available channels to raise a Compliance Concern and gives everyone a wide range of ways to let Limak know about it.

You are encouraged to speak up using any of the Reporting Channels set out below and to raise your Compliance Concern as early as possible.

While Limak encourages individuals to use its internal reporting channels first to resolve matters swiftly, they retain the right in many countries in which Limak operates to report directly to competent national authorities at any time. For example, in Turkey, individuals may report directly to the Chief Public Prosecutor's Office, MASAK (Financial Crimes Investigation Board), SPK (Capital Markets Board of Türkiye), and the KVKK (Turkish Data Protection Authority). Where such reports are made to the local authorities, Reporters retain full legal protection against retaliation.

Unless prohibited by local law, you are not required to reveal your identity when making a report. Limak provides a confidential Whistleblowing Portal (comprising toll-free phone numbers, additional numbers where toll-free is not available and an online Web Portal) through which reports may be submitted anonymously where permitted by law.

Reports should be made honestly and in good faith. A report does not need to be proven to be valid, but. Limak's whistleblowing programme is reserved for legitimate Compliance Concerns. Abuse of this system through intentionally false or malicious reporting constitutes a breach of the Code of Ethics, will not be tolerated and will result in appropriate disciplinary measures, up to and including legal action and termination from employment.

What should be Reported

There are three types of Compliance Concern:

1) Integrity and Other Compliance Concerns
2) Fraud Concerns
3) Employment and Workplace Concerns

A Compliance Concern may relate to actual, suspected, or likely wrongdoing within Limak, or outside Limak where it is connected to or may impact Limak. The examples below are illustrative and are intended to help distinguish reportable matters from routine workplace issues.

Integrity and Other Compliance Concerns

This category includes any other suspected illegal, unethical, or otherwise improper conduct by Limak, an Employee, Supplier, Business Partner, or other third party connected to Limak, including the following:

(a) Bribery or corruption
(b) Sanctions
(c) Conflicts of interest
(d) Disclosure of business confidential information
(e) Violent acts or threats to personal safety
(f) Public procurement misconduct
(g) Money laundering
(h) Tax evasion
(i) Product safety and compliance issues
(j) Environmental impact concerns
(k) Protection of privacy and personal data
(l) Retaliation (any allegation that arises from raising a Compliance Concern or having otherwise provided information about misconduct)

Fraud Concerns

Reportable Fraud Concerns include suspected deception for personal or business gain or to cause loss, such as falsified expenses, false invoicing, theft, or misuse of Company assets. They include both suspected fraud committed *against* Limak as well as that which may benefit Limak and cause loss to another party, by Employees and third parties acting on Limak's behalf.

Employment and Workplace Concerns

Reportable Concerns in this category involve suspected breaches of employment law, including anti-discrimination or anti-harassment requirements, or related Limak policies or the Code of Ethics by Employees, or a third party acting for or with Limak. They also include allegations related to human rights, including modern slavery and health and safety in the workplace, for example in the context of construction sites. Routine workplace matters such as ordinary disagreements, work allocation concerns, scheduling issues, or personality clashes should usually be raised through local management or HR processes unless they also involve a Compliance Concern.

How to Raise a Concern

Limak provides a range of secure and confidential channels (together, the "Reporting Channels") through which Compliance Concerns may be raised, including the following:

(a) Their manager;
(b) The superior of their manager;
(c) HR function;
(d) Legal and /or Compliance Office contact;
(e) Limak confidential Whistleblowing Portal (comprising toll-free phone numbers additional numbers where toll-free is not available and online web. These can be found at https://limakallegationcms.caseiq.app/portal)

When raising a Concern, Reporters should include as much information as possible: this may include as a summary of events, the date when it happened (and other relevant dates), information that would help identify the alleged perpetrator, details of any individuals who witnessed the Concern and reference to any documentation that may be assist an investigation.

Managers' Responsibilities

Managers must encourage a speak-up culture, receive Concerns respectfully, protect confidentiality as far as possible, and promptly escalate any Compliance Concern they receive or become aware of to the Whistleblowing Portal or the Compliance Office. Managers must not screen out, suppress, or investigate Concerns themselves unless specifically authorised to do so under a separate process.

Managers must never engage in, encourage, or tolerate retaliation. Any actual or suspected retaliation, or any attempt to identify an anonymous Reporter improperly, must be reported immediately through the Reporting Channels set out in this Policy.

How Reports are Handled

Reports are received and handled as confidentially as possible and are shared only with those who have a legitimate need to know. Limak seeks to acknowledge reports within 7 days and to conduct an initial intake and triage review so the Concern can be directed promptly to the appropriate subject matter expert under the relevant internal process. When triage review results in the launch of an investigation, the aim is to complete it within 3 months; in the case of complex investigations which take longer, substantive feedback will be provided within 3 months. Further information can be found in the Allegations Case Management Directive

Protection Against Retaliation and Confidentiality

Limak prohibits retaliation or discrimination against any person who, in good faith, raises a Compliance Concern, helps another person to raise a Concern, or participates in a related process. This protection applies even if the Concern is ultimately unsubstantiated, provided it was raised honestly and in good faith.

The following are examples of conduct that may constitute retaliation if linked to a report made under this Policy; the list is illustrative and not exhaustive.

<u>Direct Consequences (including harassment):</u>

a) suspension, lay-off, dismissal or equivalent measures.
b) demotion or withholding of promotion.
c) imposition or administering of any disciplinary measure, reprimand, or other penalty, including a financial penalty.
d) coercion, intimidation, harassment, or ostracism.
e) early termination or cancellation of a contract for goods or services.
f) discrimination, disadvantageous or unfair treatment.

<u>Indirect Consequences:</u>

g) withholding of training.
h) transfer of duties, changes of location of place of work, reduction in wages, change in working hours.
i) a negative performance assessment or employment reference.
j) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment.
k) failure to renew, or early termination of, a temporary employment contract.

<u>Other Consequences (including reputational):</u>

l) cancellation of a license or permit; or
m) psychiatric or medical referrals.
n) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income.
o) blacklisting based on a sector or industry-wide informal or formal agreement, which may result in the person not, in the future, finding employment in the sector or industry.

Any person who believes they have suffered retaliation, victimisation, or other adverse treatment because of a report should raise this as a new Compliance Concern using the Reporting Channels set out in this Policy. The same applies where a person believes someone else has been subjected to retaliation for speaking up.

Limak seeks to protect the confidentiality of reports and the identity of Reporters, subject to applicable law and the need to conduct an appropriate intake, assessment, and follow-up process. Information relating to a report will be disclosed only to those who need it for proper handling of the matter.

If a Reporter chooses to identify themselves, Limak will keep their identity confidential wherever possible. In limited circumstances, disclosure may be required by law or necessary to protect an individual’s safety or comply with a legal obligation.

Limak also seeks to protect the identity of subjects of investigation (the alleged perpetrator or wrong-doer against whom allegations have been made). Appropriate rights and protections shall be applied in respect of these individuals, including the presumption of innocence, because allegations will not always be substantiated. Where they are not, it would be unfair to the subject for their reputation to have potentially been damaged because this may result in colleagues having lost trust and confidence in them.

Reports submitted through designated Reporting Channels are managed using measures designed to protect confidentiality and, where anonymous reporting is permitted, to support anonymity.

5. Governance - Roles, Responsibilities & Reporting Lines

The Group Ethics and Compliance Committee (GECC) and relevant Sectors Ethics and Compliance Committees shall be responsible for approving process-related corrective measures and recommending appropriate sanctioning measures for relevant compliance infringements to the appropriate level of management in accordance with the relevant committee charters.

The GECC and relevant Sector Ethics and Compliance Committees may delegate this responsibility to remediation committees established at Group and Sector levels, as deemed appropriate.

The Chief Compliance Officer, acting on behalf of the GECC, reports to the Audit Risk & Compliance Committee on the sanctioning and process-related remediation activities of the GECC and, as deemed necessary, the sanctioning and process-related remediation activities stemming from GECC.

6. Consequences for Breaching this Policy

Failure to comply with this Policy (without an approved exception if applicable) may result in disciplinary action up to and including termination of employment.

7. Point(s) of Contact

Questions about this Policy or how to raise a Compliance Concern should be directed to the Compliance Office.

8. Policy Owner

The Compliance Office owns this Policy and is responsible for maintaining it and overseeing its implementation.

9. Document updating, Storage and Publication

This Policy was reviewed by the Limak Audit and Risk Compliance Committee and approved by the Board of Directors in July 2026. It replaced the Code of Business Ethics Implementation Principles Compliance and Violations Policy.

The Policy will be reviewed periodically and updated as necessary to reflect legal, regulatory, and operational developments. The current version will be stored and made available through Limak's designated policy publication channels.

This Policy has been translated into several languages. In the event of any inconsistency between the language versions, the English version shall prevail, without prejudice to any mandatory provisions of applicable local law.