

2025



# POLICY ON ODAS ETHICS HOTLINE

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# 01 Purpose and Scope

The Policy on ODAŞ Ethics Hotline (the "Policy") has been drafted to outline the purpose and structure of the reporting line in order to ensure compliance with ethical principles in all operations of ODAŞ Elektrik Üretim Sanayi Ticaret A.Ş. ("ODAŞ") and its affiliates, in line with the understanding of commitment to ethical principles, transparency, accountability, and corporate responsibility.

The purpose of this Policy is to ensure that reports of conduct in violation of ODAŞ'S Code of Ethics, ODAŞ's policies, or applicable laws and regulations are submitted through a secure, anonymous, and effective system; to establish an organization that allows for impartial assessment of reports; and to establish a preventive structure throughout the company against unethical conduct.

ODAŞ Ethics Hotline is not only a strategic tool intended to detect violations, but also to strengthen a sustainable ethical culture, ensure that corporate values are internalized by employees, and protect corporate integrity.

The Policy covers employees, managers, subcontractors, suppliers, and other business partners of ODAŞ. Reports made in good faith through the ODAŞ Ethics Hotline are handled with zero-tolerance for retaliation, regardless of the identity of the person making the report.

# 02 ODAŞ Ethics Hotline and Reporting Methods

ODAŞ provides an open, secure, and accessible ethics hotline system to its employees and business partners in order to enable the reporting of actions and behaviors that violate ethical principles. This system is operated through the Speak-Hub platform, an impartial and independent third-party service provider.

The system is accessible at [www.speak-hub.com](http://www.speak-hub.com), and employees can log in using their username and password, which have been communicated to all employees by the Company. Reports can be made by sharing identity information or anonymously. Reports made through the ODAŞ Ethics Hotline can also be submitted via the hotline number +90 212 800 65 95 and the email address [odas@speak-hub.com](mailto:odas@speak-hub.com).

The reports submitted are received by an independent service provider and categorized based on criteria such as the type of ethical violation, the location where the violation occurred, the parties involved, and the subject of the report; and they are transferred to the ODAŞ Ethics Committee's administrator screen and submitted to the ODAŞ Ethics Committee for review.

The ODAŞ Ethics Committee is authorized and responsible for taking necessary actions, initiating investigation processes, making recommendations for sanctions, or taking administrative decisions according to the nature of the case. Confidentiality and impartiality are essential throughout the



process; communication regarding the follow-up of the report can be established anonymously with the reporting person via the ODAŞ Ethics Hotline.

This system contributes to the establishment of an agile and sustainable ethical management structure within the Company.

## 03 Principles and Guarantees

ODAŞ Ethics Hotline is built around the company's principles of ethical integrity, transparency, accountability, agility, and sustainable compliance. The key principles governing the operation of the system are summarized below:

### 3.1. Anonymity and Confidentiality

The disclosure of personal information in reports made through the ODAŞ Ethics Hotline is entirely at the discretion of the person making the report. Anonymous reports are considered without the requirement to disclose identity. All reports are handled with the utmost confidentiality within the limits of the law and are shared only with relevant parties.

### 3.2. Protection Against Retaliation

ODAŞ encourages all reports made in good faith within the framework of ethical principles and takes all necessary measures to ensure that the professional positions of these individuals are not affected. Any direct or indirect retaliation against individuals who make a report to the ODAŞ Ethics Hotline will be considered a serious violation under the disciplinary process.

### 3.3. Integrity and Responsibility

It is essential that reports are as concrete as possible, based on observation or information. False reports made to the ODAŞ Ethics Hotline for personal gain or with malicious motives are considered unethical behavior. Operating in line with these principles, the ODAŞ Ethics Hotline aims to establish a dynamic, reliable, and sustainable ethical awareness within the corporate culture.

## 04 Duties and Responsibilities

The ODAŞ Ethics Committee is responsible for the operation of the ODAŞ Ethics Hotline and the assessment of reports. The ODAŞ Ethics Committee receives reports referred by an independent third party, reviews their content in accordance with ethical principles, company's internal regulations, and applicable laws and regulations, initiates investigation processes when necessary, and takes appropriate action.

All employees, managers, and business partners of ODAŞ are obligated to act in accordance with this Policy and ODAŞ's Code of Ethics, to report any suspicious circumstances to the ODAŞ Ethics Hotline, and to contribute to the strengthening of the ethical culture.



Cooperation among all internal stakeholders is essential for the proper processing of reports made to the ODAŞ Ethics Hotline, for ensuring that they are handled in accordance with the guidance of the ODAŞ Ethics Committee, and for the system to operate in a sustainable, agile, and reliable manner.

### 05 ODAŞ Ethics Hotline Training

ODAŞ regularly conducts awareness and training programs to ensure that its employees can use the ethics hotline system effectively and correctly. New recruits are provided with basic information about the ODAŞ Ethics Hotline during their induction process; and existing employees are provided with updated training content at specific intervals.

These training sessions cover key subjects such as the purpose of the ODAŞ Ethics Hotline, how to use it, the principles of confidentiality and anonymity, and the circumstances under which reports can be made. Furthermore, practical guidance is provided based on potential scenarios that employees may encounter.

Training programs are intended to strengthen the company's sustainable ethical culture, build employee trust in the ODAŞ Ethics Hotline, and enable dynamic use of the system.

### 06 Enforcement

The Policy on ODAŞ Ethics Hotline has entered into force as of 25.07.2025, pursuant to the Board of Directors' Decision dated 25.07.2025 and numbered 2025/10. The effective date and version information of the Policy shall be clearly stated in the document. The Policy is published and made available on internal company systems and the corporate website.

ODAŞ Ethics Committee is responsible for implementing, monitoring, and assessing the effectiveness of the Policy. Within this scope, ODAŞ Ethics Committee identifies risks in the implementation of policies, reviews the ethics reports received, monitors the system's effectiveness regarding violations, and recommends corrective actions when necessary. Recommendations for revisions are prepared by the ODAŞ Ethics Committee and implemented by the Board of Directors. Updated versions of the Policy are clearly communicated to all employees and relevant stakeholders.



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