



## WHISTLEBLOWER POLICY

### 1. OBJECTIVE

The objective of this Whistleblower Policy (“Policy”) is to provide for the principles and procedures that Mavi Giyim San. ve Tic. A.Ş. (“Mavi”) imposes for receiving, reporting and notifying situations or incidences identified or observed as non-compliant with applicable laws and regulations, relevant internal policies and procedures, best corporate governance practices, and ethical principles.

### 2. SCOPE

This Policy applies to any individual who provides ethical notifications or reports to Mavi verbally or in writing, particularly via the Ethics Line.

### 3. POLICY

#### 3.1. REPORTING VIA ETHICS LINE CHANNELS

- In the event that situations or incidences are identified or observed as non-compliant with applicable laws and regulations, internal policies and procedures, best corporate governance practices, and ethical principles (*including but not limited to the ethical rules specified in [Mavi’s People and its Principles](#)*), such violations must be immediately reported or notified but with integrity and respect for the personal rights of the individuals involved.
- It is essential for individuals reporting an incident or situation to substantiate the information with detailed and clear documentation and specify the individual(s) involved, and the time and place of the violation so that it can be reviewed and investigated properly and effectively. The recipient of the notification shall inform the reporting individual during the reporting that the reporting individual may be contacted, in case additional information and documents will be required.
- The reports or notifications of an individual regarding a violation cannot not be withheld in any way.
- The situations or incidences reported or notified within the scope of this Policy are reviewed in accordance with the **Procedure on Reporting and Investigation of Non-Ethical Conduct**.

### **3.2. ETHICS LINE CHANNELS**

- Ethics Line is a 24/7 support system operated by a third party/third parties, completely independent from Mavi, enabling the reporting of non-compliance detected or witnessed in Turkey and other countries, by individuals wishing to voice concern or ask questions. The Ethics Line can be accessed via the dedicated website at [www.maviethicsline.com](http://www.maviethicsline.com).

### **3.3. NATURE OF REPORTING AND PRIVACY**

- Reporting individuals shall make the reports by maintaining objectivity and good faith, and without personal animosity, targeting the personal rights of the people involved, or defaming others. Reporting individuals must not include or base their reports on any information or documents obtained illegally any such information or documents will not be allowed into the investigation process, and the reporting individual will be solely liable for all responsibility arising from them. Reports that are based on clear false or misdirected information will be closed without detailed review and/or investigation in line with the approval of the Compliance Executives.
- Mavi will use all best endeavours to assure that the identity of the individual reporting a violation will be kept in confidence and remain anonymous. Accordingly, reporting individuals should be able to report any violation without any due hesitation or concern in line with this assurance provided.
- In the reports or notifications made through the Ethics Line channels, individuals are not required to disclose their identity, and they may choose to remain anonymous. In anonymous reports or notifications, no inquiries will be made to identify the reporting individual. However, certain information (such as position, title, workplace or store information) included during the reporting process may not ensure anonymity. Therefore, individuals who wish to remain anonymous, should not include information that might lead directly to their identity.
- During the review and decision process, the identity of the reporting individual will be protected and kept in strict confidence.
- Reports and notifications received via the Ethics Line Channels are communicated concurrently through the Central Incidence Recording System to the Compliance Executives (*Head of Legal and Compliance and Senior Manager of Legal and Compliance, who reports to the Head of Legal and Compliance*) and the Director of Internal Audit. Reports and notifications will be evaluated by the Compliance Executives and, if necessary, will be the subject of investigation by the relevant departments. Investigations may not be conducted for all received reports and notifications if the Compliance Executives and relevant departments determines that an alternative approach would be more appropriate.

- Reporting individuals shall not share any information about violation reports with third parties other than the authorized and responsible departments of Mavi, without prejudice to the provisions of the applicable legislation.
- Mavi protects the confidentiality of reports and notifications made by individuals and will use its best endeavours to ensure that reporting individuals will not be subjected to any retaliation. Mavi will not tolerate any potential retaliation against reporting individuals. Furthermore, reporting individuals shall not be subject to actions such as demotion, disciplinary measures, dismissal, salary decrease, reassignment or similar sanctions as a result of their reporting of any incidence of unjust treatment, safety concern, management weakness, abuse of duty or power, or legislative infringements (*without prejudice to the sanctions to be applied due to the unlawful behavior of the reporting individuals*).

#### **3.4. AUTHORITY AND RESPONSIBILITY**

- This Policy is drafted by Mavi's Legal and Compliance Division.
- Legal and Compliance Division will review this Policy at regular intervals or as required.
- In the event that the provisions of this Policy differ from the applicable local legislation in the relevant country, Mavi's policies and procedures or the applicable local legislation, whichever is more restrictive, will prevail (provided that they do not violate applicable local legislation).