

Liba Laboratuvarları A.Ş.

Whistleblowing Policy

June 8, 2020

1 OBJECTIVE AND SCOPE

Whistleblowing Policy (“the Policy”) aims to encourage Liba Laboratuvarları A.Ş. (together referred as “Liba” or “the Company”) employees and business partners to report their concerns without any fear of retaliation when they encounter any incident that violates Liba Code of Ethics and Business Conduct. In this way, it is aimed to detect compliance breaches within the Company earlier.

With this Policy, Liba aims to implement the following practices within the Company:

- To prevent damage to the Company, employees and business partners by learning any illegal and unethical behavior on time,
- Establish a reporting mechanism where employees and Liba business partners can raise concerns without any fear of retaliation,
- To ensure that all notifications made to the relevant channels are evaluated quickly and fairly,
- Developing preventative measures against unethical actions that may occur within the company,
- Protecting the rights of the Company, employees and business partners,
- Creating a corporate culture that is committed to ethical principles that Liba employees and business partners are always proud of,
- To improve the openness and accountability environment within the Company.

2 DEFINITIONS

The terms, words, and expressions used in this Policy are to derive their meaning from the effective laws and regulations unless their definition is provided under this section.

Anonymous Notification: It refers to making notifications without giving name and contact information to notification channels and related managers.

Business Partner: It refers to real and legal persons who may affect/be affected by the results of Liba's activities, goals, policies, studies and outputs.

Compliance Officer: It is the person responsible for ensuring that the Company complies with national and international regulations as well as internal policies and procedures. This task is carried out by the Board Member responsible for Compliance.

Retaliation: Retaliation is generally defined as any negative action against the Whistleblower due to his/her notification. Retaliation may occur in the following forms but not limited to:

- Dismissal,
- Changing the workplace,
- Mobbing,
- Discrimination,
- Limitation of rights such as premium / promotion / raise.

Whistleblower: She/he is the person who expresses her/his concerns about any action that does not comply with international and local laws, regulations, sectoral regulations, Code of Ethics and Business Conduct and her/his views about the Company's areas of development.

Whistleblowing (Notification): Refers to the signed or anonymous communication of unethical behaviors, practices that are incompatible with Company policies, or violations of the law to the dedicated managers.

Whistleblowing Line: Whistleblowing Line is a reporting tool that is chased by the General Manager of the Company, who is also a Board Member, and by Board Member Responsible for Compliance, where employees (and other business partners, such as vendors, resellers, if desired) can share matters that they cannot share with their managers.

3 GENERAL PRINCIPLES

Liba attaches great importance to being honest, transparent and accountable in all its businesses. It is the duty of all employees to act in accordance with the ethical standards of the Company and to maintain a culture of honesty and respect. Therefore, all employees must comply with the Code of Ethics and Business Conduct and other policies of the Company.

Violations of laws and rules, theft, fraud, bribery, discrimination, harassment and conflict of interest threaten the general interests of individuals, companies and society. It also leads to injustice, material and moral damages. When such situations are encountered within the Company, it is a conscientious duty to inform the Company managers.

Whistleblowers should report their concerns and complaints to “libaetikhatti@liba.com.tr”. Notification topics may be exemplified including but not limited to following:

- Theft and fraud,
- Conflict of interest,
- Embezzlement,
- Misuse of duties and powers,
- All kinds of discrimination,
- Bribery and corruption,
- Money laundering and financing of terrorism,
- Improper use of Company assets,
- Harassment,
- Damaging the assets of the Company,
- Violation of legal regulations,
- Irregularity in accounting records,
- Sharing the Company's trade secrets without permission.

Whistleblowers can make anonymous notifications without sharing their name and contact information to the specified e-mail address. In anonymous reports, Liba does not attempt to identify the name of the whistleblower. Only efforts are made to investigate the notification.

Strong suspicion is enough to make a notification, and all notification and investigation processes are carried out in strict confidentiality. Sanctions may be imposed under the Liba Disciplinary Policy in case of deliberate fraudulent notification.

The person who plans to make notification should ask the following questions to herself/himself, and report when she/he is confident.

- Is the situation/event/behavior/practice I intend to report against the law?

- Does it comply with Liba Code of Ethics and Business Conduct?
- Can I explain it to my family and relatives?
- In case it is reflected in the press, does Liba feel comfortable?
- Did I consult any of my colleagues who have knowledge about this issue?

4 REPORTING CHANNELS

Employees may report any issues that they consider breaches the Code of Ethics and Business Conduct and related policies to the e-mail address of “libaetikhatti@liba.com.tr”. The use of the specified e-mail address is important for the storage and retention of records. Only the General Manager and the Compliance Officer have access to this e-mail address. If the subject to be reported is related to one of these two persons, a direct notification can be made to the other person's e-mail address or phone number. If you want to make a notification about the Board Member responsible for Compliance and the Company General Manager at the same time, you can directly report to Lale Barlas' e-mail address (lale.barlas@liba.com.tr) or phone number.

The Company undertakes to hide and protect the whistleblower's personal information based on her/his preferences to remain anonymous. The identity of the whistleblower will be kept anonymous and will not be shared with third parties, unless the/she has given clear consent that his/her personal information may be disclosed.

In the event that the person who notifies within the scope of the Personal Data Protection Law (“the Law”) numbered 6698 shares the name-surname and contact information with the Company, the personal data of the person is processed by the Company. If the employee has shared his/her personal information in the notification and it is requested by the courts, the name and contact information can be shared only with the courts.

5 NOTIFICATION AND INVESTIGATION

In order to evaluate and finalize the notices to be made in the most accurate way, the whistleblower should provide sufficient and detailed information as much as possible. For this reason, the notifications to be made by the whistleblower should include the answer for the following questions:

- Details of the suspect(s)
- Detailed information on the situation:
 - Where, when and between whom did the incident occur?
 - When did the incident first occur? What is the date of your first experience? Does it have continuity?
 - When will it occur if it has not happened yet?
 - When did the whistleblower recognize this situation?
 - Who are the witnesses (if any) of this event?
 - Did she/he witness the event or did she/he learn the incident from third parties?

The Compliance Officer decides whether additional investigations should be made for the incoming notice. If a review is required, it is carried out by Compliance Representatives directed by the Compliance Officer or an independent third-party service provider. The

results of the investigation and the proposal for disciplinary sanction are sent to the Disciplinary Board.¹ The Disciplinary Board decides whether any disciplinary sanction will be imposed or not.

In the event that a notification is made about the Compliance Officer to the General Manager, the General Manager decides whether an investigation should be made or not. In this case, the investigation may be carried out by the General Manager personally, a designated employee or an independent third-party service provider. In case the notification is about the General Manager, the Board of Directors is informed about the issue and an examination is made by the Compliance Officer.

6 PROTECTION OF THE WHISTLEBLOWER

It is crucial that employees should feel comfortable and safe in raising their concerns. For this reason, all reporting processes are carried out confidentially, and whistleblowers are protected against possible retaliation. Liba adopts the zero-tolerance principle for possible retaliation situations that whistleblowers may be exposed to.

The identity of the whistleblowers will not be disclosed unless they give a clear consent. Retaliation actions against the whistleblower will be considered as a policy violation and may be subject to disciplinary action after the Disciplinary Board's assessment.

In good faith notices, even if the accuracy of the incident is not proven by investigation, no action is taken against the whistleblower.

7 AUTHORITY AND RESPONSIBILITIES

As all employees are required to comply with this Policy, it is the responsibility of the General Manager and the Compliance Officer to ensure the enforcement of this Policy.

The violation of the policy constitutes an important disciplinary offense and may result in disciplinary actions requiring verbal or written warnings, or the termination of employment.

In the event of witnessing behaviors that violate this policy, employees may report to;

- libaetikhatti@liba.com.tr
- The Compliance Officer, or
- The General Manager.

This Policy is periodically reviewed by the Compliance Officer in line with evolving legal obligations and Company processes.

¹ Please see Liba Laboratuvarları A.Ş. Disciplinary Policy for more information.