



About the Ethics Hotline What is the Ethics Hotline?

TEMSA regards its employees as its most important resource and believes that a positive working environment and the highest level of productivity can only be achieved through the establishment and maintenance of open communications channels. The Ethics Hotline is a system implemented to effectively manage these communications channels. We believe that an effective ethics reporting system that is accessible to everyone plays a significant role in our efforts to foster a culture of integrity, protect ethical values, enhance reputation and strengthen ethical decision-making mechanisms, and we are therefore taking the necessary steps accordingly.

Reporting – General

What situations should I report?

Any unwanted situations including possible work-related conflicts of interest, unethical behaviours or attitudes, violations of laws, or breaches of TEMSA's General Codes of Conduct and TEMSA's ethics and compliance policies and procedures should be reported.

If I witness a violation, shouldn't I report it to my manager or the human resources department and let them handle the matter?

As we consider the reporting of violations to be important, we expect all our employees and stakeholders to report to us any suspected violations of TEMSA's General Codes of Conduct, TEMSA's ethics and compliance policies and procedures and/or the applicable legislation. If you are an employee, we recommend that you first communicate your concerns to your manager, or another manager who you think may be relevant. However, we are well aware that there may be situations where you hesitate to report in this way. For such situations, TEMSA receives services from Sanction Trace, an independent service provider. We would prefer you to report the situation to us anonymously through this platform rather than hiding it. There is no possibility for TEMSA or any TEMSA employee to access your identity or contact details in any way.

Why should I report what I know? What benefit would I gain from doing this?

We all have the right to work in a positive environment and, in order to maintain this environment, we have an obligation to report activities that we believe are not conducted appropriately. By working together, we can create a healthy and productive environment. Additionally, misuse of duty, conflicts of interest, or other actions or attitudes contrary to ethical standards may lead to financial losses or reputational damage within our company. Early detection of these issues and the rapid implementation of corresponding measures will benefit all stakeholders, including employees, the company, and its business partners.

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Does the management really want me to report such issues?

As detailed in the headings above, we certainly expect everyone to report any correct or reasonably suspected cases in an honest way and in good faith. Employees, business partners and other stakeholders are the first to know about any matter that may require reporting. Reports you will make can minimise any potential negative impact on our company and employees. Additionally, the information you share can help identify any relevant issues and take measures to improve corporate culture and performance.

Who should I consult to get information about compliance management and the implementation of related policies?

You can find detailed information about compliance management and the implementation of related policies [here](#).

Who can access the reports?

When you enter the reporting area, your reports will directly reach the Ethics Hotline secure server. The Ethics Hotline makes these reports accessible only to certain individuals responsible for evaluating the report within the company, based on the type of violation and the location of the incident. Each recipient of this report has received the necessary training to keep the report as confidential as possible.

How does the reporting process work?

When you access the system to report a violation, you will be asked several questions. Your choices and responses there will contribute to the progress of the process. If there is any missing information, document, or source in the report examined by the Ethics Committee, you will be informed about such deficiencies through the same system. The system will ask you to set a password before you can create your report, and those addressing the issue using any additional information you have entered into the system will provide you with feedback about your report as soon as possible through the same system.

Can we call this system a 'big brother is watching you' situation?

The Ethics Hotline is a positive part of our overall philosophy aimed at ensuring a safe, secure, and ethical workplace. We encourage you to seek guidance on ethical dilemmas, make suggestions, or share your concerns with us about issues you are worried about. Effective communication is of critical importance in today's workplace. We have carefully selected and made available to you the most effective reporting tool to fulfil our compliance obligations while also providing a positive reporting environment.

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Reporting Security and Confidentiality

Is it true that a server which shows all the websites my computer connected to creates logs about the reports I send from the company computer? And won't these logs reveal my identity as the person who submitted the reports?

The Ethics Hotline does not create or store any internal connection logs with IP addresses. Additionally, the Ethics Hotline commits to not sharing any third-party information. Should you still have any reservations about this, we recommend that you submit your reports when outside the company's internet networks or from computers with public internet connections (airports, libraries, etc.).

Can I report from the workplace or home and still remain anonymous?

Reports that you will send from the workplace, home, a friend's computer, or any internet portal will remain secure and anonymous. Internet portals never identify visitors with their names that appear on the screen, and the Ethics Reporting system ensures anonymity by not storing IP addresses.

I am concerned that the information I provided to the Ethics Hotline will ultimately reveal my identity. How can you guarantee me that this won't happen?

The Ethics Reporting system is designed to protect your anonymity. However, if you wish to remain anonymous as the reporting party, you must ensure that you do not accidentally disclose your identity in the text of the report. For instance, if you construct a sentence like "from my room that is next to Jane Doe's..." or "given my 25 years of professional experience...", there is a possibility that your identity could be revealed. Therefore, we may advise you to ensure that no matters that are specific to you or that can be associated with you do not appear in your reports.

May I request that my identity be clearly stated in my report?

There is a section where you can choose to identify yourself in the report. Please note that specifying the identity can, in some cases, expedite the resolution of the reported violation or the implementation of necessary measures.

What should I do if I am worried that reporting an issue will negatively affect me or my job?

It is stated in our company policies that all reports will remain strictly anonymous and that individuals involved in the matter will not be able to intervene. TEMSA in no way allows any retaliation against individuals who have reported an issue in an honest way and in good faith.

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Can you guarantee that I won't be harmed for reporting an issue?

TEMSA is committed to protecting those who report an issue, even if the accuracy of the incident cannot be proven through an investigation, provided that the report is submitted in good faith by referring to reasonable grounds and is not made with the intention of victimising anyone, causing harm, or gaining personal benefit. However, if it is revealed during an investigation that the reporting party has intentionally and maliciously submitted a false report, disciplinary processes may be initiated against this employee. Therefore, it is extremely important that reports are based on observations and, if possible, verifiable or contain reasonable suspicion.

Tips and Best Practices

I am aware that some people engage in unethical behaviour, but it does not affect me. Why should I report them?

Unethical behaviours may threaten the general interests of individuals, our companies, and society, and lead to material and moral damages, as well as loss of reputation, and injustice. Therefore, when you encounter a situation that may require reporting, please consider it your duty to yourself, your colleagues, the company, and society.

I am not sure whether what I have observed or heard constitutes a violation of the company policy or involves unethical behaviour, but it does not feel right to me. What should I do?

Even if you find yourself in such a dilemma, we still expect you to report such situations. We would prefer you to report any potential unethical behaviours that will turn out to be harmless, rather than not have the opportunity to check such a situation due to your uncertainty about reporting. By reporting, you will contribute to preventing any unethical behaviour or attitude, conflict of interest, misuse of duty, or any other adverse conditions.

What happens if my managers are involved in a violation? Won't they take the report and cover it up?

The Ethics Hotline and report distribution are designed to avoid the parties mentioned from being aware of or accessing the relevant reports.

If the situation I want to report is directly related to TEMSA Top Management, how can you ensure that I remain anonymous?

Please note that your ethics-related reports are directly forwarded to the Department of Chief Legal Affairs and Compliance Counselling of TEMSA. In such a case, no employee at TEMSA will have the right to access your report. If your report concerns a senior executive at TEMSA, necessary measures will be taken to prevent conflicts of interest and ensure a fair investigation.

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What if an important matter regarding the incident comes to my mind after I submit the report? Or what if the company has further questions about my report?

When you report a situation through the Ethics Hotline, you will be given a unique, random number called a "Report Key", and asked to set a password. You can make any addition to your report by logging into the platform with this report key and password. Through the same system, you may also receive additional queries with regard to including any missing information or any other details about the matter. Therefore, it is very important that you follow up on your report and contribute as much as possible to the resolution of the issue. We recommend that you respond to the questions sent to you through the platform within the specified time. Thus, both you and the company will enter into an "anonymous dialogue" where irregularities are not only identified but also resolved, no matter how complex they may be.

Are the same security measures applied in tracking the reports?

All correspondence related to reporting is treated with the same confidentiality principles and anonymity as the initial report.

What happens if I lose my Report Key or forget the Password I created?

To ensure the maintenance of security and confidentiality, you must issue a new report if you lose your report key or password. It would be convenient to indicate in your new report that the new entry is related to a report you have previously submitted.

Is it possible to withdraw my report?

Reports may not be withdrawn once conveyed to the authorised persons at TEMSA. However, you can always create a new report to submit a withdrawal request or share information indicating your misunderstanding of the incident.

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