<b>BORÇELİK</b>	Document Title : Stakeholder Feedbacks and Complaints Management Procedure			Issue No 10.45		
Issue Date: 12.08.2022	Grounds for Revision : New Procedure					
Rev. Date :						
Revision No : 0		Prepared and Revised by:	App	roved by :		
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#### 1.0 PURPOSE

The purpose of this procedure is to explain the activities related to meeting and evaluating the notifications related to Borçelik's operations, taking precautions if necessary and providing feedback to the person/institutions that submitting the notification.

#### 2.0 SCOPE

This procedure applies to all notifications submitted by the stakeholders related to Borçelik operations.

## 3.0 GROUNDS AND RELATED DOCUMENTS

**30.08** Procedure for the Control of Documents and Records

**09.01** Objectivity Management and Risk Assessment Procedure

09.05 Confidentiality and Security Procedure

30.05 Corrective and Preventive Action Procedure

Borusan Code of Conduct and Code of Ethics (Orange Guide)

Borçelik Website

Orange Ethics HotLine

Borçelik External Stakeholder Engagement Policy

Borçelik Human Rights Policy

#### 4.0 DEFINITIONS

- **4.1 Notification:** Suggestions, complaints, positive feedback/acknowledgements conveyed to the organization by our stakeholders regarding Borçelik's operations.
- **4.2 Feedback Committee:** Feedbacks are evaluated by the Borcelik Sustainability Committee.

#### 5.0 PROCEDURE

# 5.1. General

**Feedback Committee** ensures all objections and complaints to be handled in a constructive, impartial, fair and prompt manner in accordance with confidentiality and security rules.

Feedback Committee is responsible for all decisions taken at every stage of the feedback evaluation process.

# 5.2. Notifications

Individuals and organizations can submit a notification for free either anonymously or with their consent through https://www.borcelik.com/geri-bildirim.

Situations/events that may be subject to notification:

Emergencies (fire, explosion, flood and inundation)

Diversity and Inclusion

**Environmental Impacts** 

Ethical Rules

Human Rights:

Occupational Health and Safety

Data Protection

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Internal Use Only

Confidentiality Classification:

Sınıflandırma: Borusan Grubu Özel Classification: Borusan Group Confidential

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Notifications about our products are out of the scope of this procedure. Such notifications are regulated exclusively in the Customer Complaints Procedure No. 71.01.

## 5.3. Recording the Notifications

Any notification submitted to Borçelik is recorded and kept by the Feedback Committee via the Borçelik Notification Evaluation Form No: **F10.45-01**.

## 5.4. Investigation of the Accuracy, Evaluation and Settlement of the Notifications

## 5.4.1. Investigation of the Accuracy of the Notifications

Notifications are evaluated by the Feedback Committee. Records and documents that will constitute a proof of the notification shall be provided.

Notifications shall be carefully evaluated on the basis of evidence in terms of impartiality, transparency, objectivity, presence of conflict of interests, security and confidentiality.

Confirmed notifications shall then be evaluated for the purpose of realizing other stages specified in the procedure.

For the notifications whose accuracy cannot be certified on the grounds of evidence, **Borçelik Notification Evaluation Form No: F10.45-01** shall be terminated, archived and the notification shall not be further evaluated.

# 5.4.2. Evaluation of the Notifications

Submitted notifications are evaluated in accordance with the following categories:

Complaints: Complaint is an expression of dissatisfaction with regard to the operations of Borçelik.

**Suggestions:** These are the notifications conveyed to the organization with regard to the operations of Borçelik with the expectation of improvement.

**Positive Feedbacks/Acknowledgements:** These are expressions of satisfaction with regard to the operations of Borcelik.

Borçelik gives due consideration to local customs, traditions, rules and legal systems while evaluating the feedback received.

#### 5.4.3. Finalization of the Notifications

Notifications regarding the violations of human rights and ethical rules, diversity and inclusion are forwarded to the Borusan Orange Ethics HotLine and are managed in accordance with the Ethics Management and Discipline Procedure.

Notifications regarding emergencies are forwarded to the emergency committee leader and the committee is expected to take action. Actions are then reported to the Feedback Committee.

Notifications regarding environmental impacts are forwarded to the environmental committee leader and the committee is expected to take action. Actions are then reported to the Feedback Committee.

Notifications regarding occupational health and safety issues are forwarded to the OHS committee leader and the committee is expected to take action. Actions are then reported to the Feedback Committee.

Notifications regarding Data Protection are forwarded to the information security committee leader and the committee is expected to take action. Actions are then reported to the Feedback Committee.

## 5.5. Feedback with regard to Objections and Complaints

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Notifications are evaluated within 30 working days at the latest from the date of submission, the actions taken and the necessary response regarding the notification are submitted to the person who sent the notification (if not anonymous).

In the event that the finalization process of the notifications is prolonged, the person submitting the notification is duly informed about the developments by a letter.

Decision taken with regard to notifications whose accuracy could not be confirmed are notified to the person submitting the notification, together with the legal grounds, via e-mail or SMS.

## 5.6. Review of the Feedback Committee Resolutions

Notifications, actions with regard to the notifications and resolutions regarding the notifications are reviewed at least once a year by the Borçelik Executive Board.

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