

 BORÇELİK	Document Title: Stakeholder Feedbacks and Complaints Management Procedure	Issue No 10.45
Issue Date : 12.08.2022	Grounds for Revision: The complaint and feedback mechanism is categorized into internal and external complaints.	
Rev. Date : 03.04.2025		
Revision No : 1		Prepared and Revised by:
Page : 1/ 5		Approved by:
	BERRİN MEYDAN	DERYA DEMİRER

1.0 PURPOSE

The purpose of this procedure is to describe the activities related to the handling and evaluation of notifications concerning Borçelik's operations, taking necessary precautions if required, and providing feedback to internal and external stakeholders who submit complaints or notifications.

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, or expressions of positive feedback/appreciation conveyed to the organization by our stakeholders regarding Borçelik's operations
- 4.2 Complaint:** Refers to concerns and issues raised by employees and external stakeholders regarding a specific matter. The scope of complaints may range from serious and potentially unethical situations such as discrimination or victimization in the workplace, to minor, day-to-day grievances raised by local stakeholders or individuals affected by a project.
- 4.3 Feedback Committee:** Consists of representatives from the Human Resources, Employee Services, and Corporate Communications departments. The committee is responsible for monitoring complaints/notifications received from internal and external sources, excluding those submitted via the Borusan Orange Ethics Line.
- 4.4 Complaint Resolver:** Refers to the person who evaluates and resolves the complaint referred to them by the Feedback Committee. These individuals are identified on the second page of the F10.45-01 Borçelik Notification Record Form.

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Page : 2/ 5	BERRİN MEYDAN	DERYA DEMİRER

5.0 PROCEDURE

5.1. General

The Feedback Committee monitors all complaints and notifications received from internal and external stakeholders in a manner that is impartial, fair, constructive, and prompt, in accordance with confidentiality and security rules. The committee, which is responsible for managing the process, convenes on a monthly basis to evaluate the operation of the system and prepares a report that includes the complaints and notifications.

Notifications regarding our products are outside the scope of this procedure. Such notifications are handled separately under the **Customer Complaints Procedure No. 71.01**.

5.2. Complaint and Feedback Mechanism for External Stakeholders

External stakeholders include local communities, neighboring organizations, national or local government institutions, non-governmental organizations (NGOs), marginalized community members, politicians, religious leaders, customers, suppliers, academic institutions, media organizations, and other entities.

External stakeholders may initiate the complaint/notification mechanism through the following channels. They may submit their complaints or notifications free of charge, either anonymously or by voluntarily providing their personal information:

- Borçelik website: <https://www.borcelik.com/geri-bildirim>
- E-mail
- Telephone
- Social media channels

At certain times of the year, informative content directing stakeholders to the feedback page on the website <https://www.borcelik.com/geri-bildirim> is shared via the company's social media accounts.

Situations/incidents that may be subject to a complaint/notification are categorized as follows:

- Emergencies (fire, explosion, flood and inundation)
- Diversity and Inclusion
- Environmental Impacts
- Human Rights
- Occupational Health and Safety
- Data Protection
- Other

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Page : 3/ 5		BERRİN MEYDAN	DERYA DEMİRER

Notifications submitted are evaluated under the following categories:

Complaints: Notifications expressing dissatisfaction with Borçelik's operations.

Suggestions: Notifications submitted to the organization with the expectation of improving Borçelik's operations.

Positive Feedbacks/Appreciations: Notifications expressing satisfaction with Borçelik's operations. The company gives due consideration to local customs, traditions, rules, and legal systems when evaluating the received complaints and notifications.

5.2.1 Collection, Recording, and Evaluation of Complaints and Feedback

- All complaints/notifications received through various channels are collected by the Feedback Committee, and the complaint/notification process is initiated.
- The complaint/notification is recorded by a member of the Feedback Committee in the F10.45-01 Borçelik Notification Record Form, and the complainant is informed within 5 days that their notification has been received. This does not apply to anonymous complaints/notifications.
- The Feedback Committee shares the complaint/notification with the responsible person who will resolve the issue based on the relevant subject category. These individuals are defined on the second page of the F10.45-01 Borçelik Notification Record Form.
- The responsible person conducts a preliminary assessment and ensures that the necessary actions are taken.
- The responsible person reports the action taken to the Feedback Committee within 30 days at the latest, so that the resolution can be communicated to the complainant. Once the resolution is shared, the F10.45-01 Borçelik Notification Record Form is updated.
- A monitoring and evaluation system is established for complaints/notifications. The monitoring process is recorded in the system by adding the number of days to the final section of the F10.45-01 Borçelik Notification Record Form.
- Once all related documents are completed, the complaint is formally closed.

The distribution of responsibilities varies depending on the type of complaint or notification, as outlined below:

- Complaints/notifications concerning violations of company rules or legal regulations by company personnel, misuse or damage of company property, actions that may harm the company's reputation, abuse of authority, harassment, sexual harassment, theft, physical assault, or similar misconduct that constitutes a breach of the Borusan Holding Orange Guide are directed to the Borusan Orange Ethics Line and managed in accordance with the Ethics Management and Disciplinary Procedure.
- Complaints/notifications regarding human rights violations and diversity and inclusion issues are referred to the Human Resources Manager.
- Complaints/notifications related to emergency situations are referred to the Emergency Committee Leader.

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Page : 4/ 5	BERRİN MEYDAN	DERYA DEMİRER

- Complaints/notifications regarding environmental impacts are referred to the Environmental Committee Leader.
- Complaints related to occupational health and safety are referred to the OHS Committee Leader.
- Complaints related to data protection are referred to the Information Security Committee Leader.

For complaints/notifications that do not fall under the above-mentioned categories, the Feedback Committee evaluates the matter and refers it to the appropriate responsible person based on the subject.

5.3 Complaint and Feedback Mechanism for Internal Stakeholders

Internal stakeholders include Borçelik employees, contractors, and subcontractors. Internal stakeholders may initiate the complaint/notification mechanism through the following channels:

- Borçelik website: <https://www.borcelik.com/geri-bildirim>
- E-mail
- Telephone
- Internal digital screens via <https://www.borcelik.com/geri-bildirim>
- Internal posters via <https://www.borcelik.com/geri-bildirim>
- Through the subcontractor representative
- Borusan Orange Ethics Line

Situations/incidents that may be subject to a complaint or notification are categorized as follows:

- Emergencies (fire, explosion, flood and inundation)
- Diversity and Inclusion
- Environmental Impacts
- Human Rights
- Occupational Health and Safety
- Data Protection
- Other

Submitted notifications are evaluated under the following categories:

- Complaints:** Notifications expressing dissatisfaction with Borçelik's operations.
- Suggestions:** Notifications submitted to the organization with the expectation of improving Borçelik's operations.
- Positive Feedback/Appreciations:** Notifications expressing satisfaction with Borçelik's operations.

The company gives due consideration to local customs, traditions, rules, and legal systems when evaluating the received complaints and notifications.

5.2.2 5.3.1. Collection, Recording, and Evaluation of Complaints and Feedback

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Page : 5/ 5		BERRİN MEYDAN	DERYA DEMİRER

- All complaints/notifications received through various channels are collected by the Feedback Committee, and the complaint/notification process is initiated.
- The complaint/notification is recorded by a member of the Feedback Committee in the F10.45-01 Borçelik Notification Record Form, and the complainant is informed within 5 days that their notification has been received. This does not apply to anonymous complaints/notifications.
- The Feedback Committee shares the complaint/notification with the responsible person who will resolve the issue based on the relevant subject category. These individuals are defined on the second page of the F10.45-01 Borçelik Notification Record Form.
- The responsible person conducts a preliminary assessment and ensures that the necessary actions are taken.
- The responsible person reports the action taken to the Feedback Committee within 30 days at the latest, so that the resolution can be communicated to the complainant. Once the resolution is shared, the F10.45-01 Borçelik Notification Record Form is updated.
- A monitoring and evaluation system is established for complaints/notifications. The monitoring process is recorded in the system by adding the number of days to the final section of the F10.45-01 Borçelik Notification Record Form.
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- Complaints/notifications regarding human rights violations and diversity and inclusion issues are referred to the Human Resources Manager.
- Complaints/notifications related to emergency situations are referred to the Emergency Committee Leader.
- Complaints/notifications regarding environmental impacts are referred to the Environmental Committee Leader.
- Complaints related to occupational health and safety are referred to the OHS Committee Leader.
- Complaints related to data protection are referred to the Information Security Committee Leader.

For complaints/notifications that do not fall under the above-mentioned categories, the Feedback Committee evaluates the matter and refers it to the appropriate responsible person based on the subject.