

### 1. INTRODUCTION

The purpose of this document is to provide a formal grievance management system, developed in order to support our employees to share their ideas, opinions, recommendations for improvement and complaints freely which will support us minimize the social risks to the business and the environment. The aim is to provide a transparent grievance process which clears conflicts and improves communication with all stakeholders.

### 2. SCOPE

This document explains the internal management methodology for with an effect on employee commitment and satisfaction; as well as their expectations and demands on corporate applications which have a direct impact on health and safety issues.

### 3. DEFINITIONS

Term	Definition
<b>Stakeholders</b>	Groups or individuals within a business who work directly within the business, such as employees, contractors and customers.
<b>Request</b>	A general definition for all input subject to this document, by our employees or internal contractors
<b>Improvement request</b>	Requests issued to improve workplace conditions for health, safety, environment or social issues
<b>Social request</b>	Individual reporting of a grievance against social compliance and human rights or corporate values such as discrimination, insult, abuse, harassment, conflict of interest
<b>Employee representative</b>	Legally recognized and authorized employees, selected or assigned to provide an additional contact line for employees to improve their communication with others and the Management

### 4. REPORTING CHANNELS

Elif provides the below channels for stakeholders to use at will.

Channel	Definition
<b>Face to Face</b>	Through our Open Door Policy, internal stakeholders can communicate with their line managers, Manager Responsible from Safety & Environment or Manager Responsible from Social Compliance
<b>e-mail</b>	Requests can be sent to <a href="mailto:ethics@elif.com">ethics@elif.com</a> and <a href="mailto:etik@elif.com">etik@elif.com</a> directly for the view of Ethics Committee.
<b>Request Boxes</b>	Request Boxes are located in common use areas such as Dining Hall, Tea Room, Changing Room Entrance and First floor Elevator Area <b>Note:</b> In case the requester does not wish to make an open request, the Request boxes can be used for anonymous notifications.

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## Elif Request Management Policy

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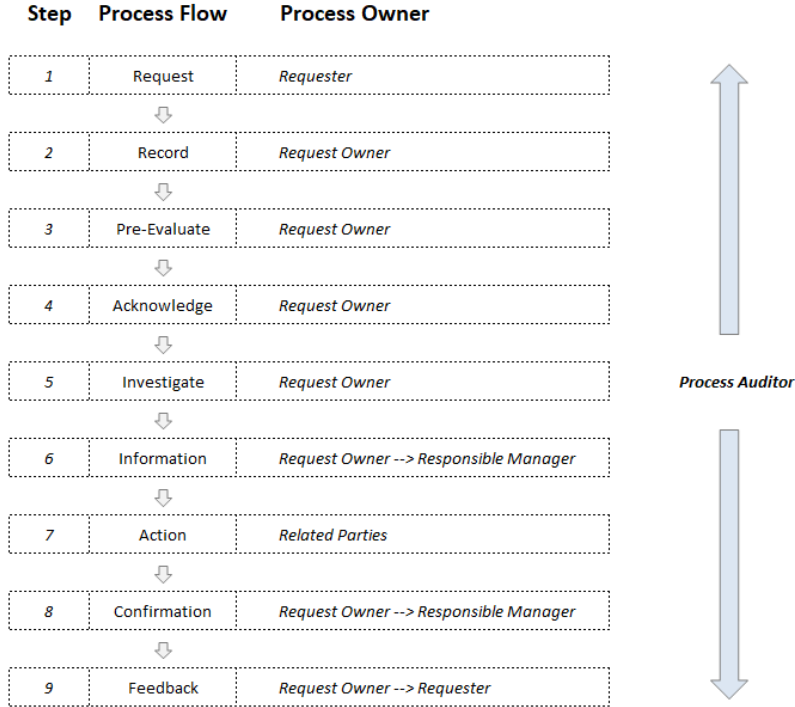
### ROLES & RESPONSIBILITIES

Role / Position	Responsibility
<b>Requester</b>	Employee or contractor who submits the grievance via defined channels.
<b>Responsible Manager</b>	Manager responsible from the request depending on the type such as Health & Environment or Social. Assigns and monitors request owner until the grievance is finalized.
<b>Request Owner</b>	<b>Improvement requests:</b> Assigned person who receives the grievance, owns and finalizes the process.
	<b>Social requests :</b> Ethics Committee receives and coordinates the process for social requests.
<b>Ethics Committee</b>	Receiving ethics grievances directly via defined channels. The committee consists of CEO, CFO and HR Director.
<b>Process Auditor</b>	Assigned person who views the process and related tools for effectiveness and improvement.

*\*Legally authorized employee representatives have the right to act as Request Owner.*

### 5. PROCESS

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**5.1. Request:** The requester submits requests via the defined channels in a simple language.

**5.2. Record:**

**a. Face to Face** : Face to face improvement requests are put into defined written format (Request Form) by the request owner and added to request tracking chart in progress. If the requester wants to address the individual request formally, request owner also uses the Request Form.

**b. e-mail** : The requests sent to the defined e-mail address are recorded and processed by the request owner.

**c. Request Boxes** : The request forms are collected by Human Resources request owners. The request forms are collected from the request boxes weekly in the presence of an employee representative.

**5.3. Pre-evaluation:** The request owner screens the collected requests and classifies them depending on the level of severity in order to define the request owner and maintain effective approach to the request.

See below table categorizing the different levels;

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Level	Description	Request Owner
Level 1	Can be answered immediately and/or there is an ongoing solution process already	HR Specialist
Level 2	Minor grievances that will not affect the reputation of the company	HR Senior level or above
Level 3	Any requests concerning human health directly	Manager Responsible from HSE
Level 4	Repeated or serious grievances that may put the reputation of the company in risk	Manager Responsible from Social Compliance

*\*Requests in contrary to the legal regulations (Law), company working rules and business ethics or hazardous for human health are not taken into consideration.*

- 5.4. Acknowledgement** : The request owner acknowledges the requests within 2 workdays after receiving the request.
- 5.5. Investigation** : The request owner is responsible for investigating the request. Investigation may require the request owner to make site visits, consult employees, contact with others and complete other activities. Recording all activities is advised to the request owner, as providing required proof when necessary is the request owner's responsibility.
- 5.6. Information** : Following the investigation, the request owner will use the findings to create an action plan in order to resolve the request. It's the request owner's responsibility to inform related managers on the action plan.
- 5.7. Action** : The request owner coordinates with related parties as per the action plan, in order to assign actions, monitor actions and deadlines.
- 5.8. Confirmation** : After all actions are taken, the request owner confirms with the parties in the action plan that the improvement has been made or the problem has been solved.
- 5.9. Feedback** : Following the confirmation phase, the request owner contacts the requester in order to inform that the request has been handled. In some grievance situations, confirmation may be directly received via the feedback from the requester.

## 6. ANNOUNCEMENT

All records regarding written requests are updated monthly and shared in Request Tracking Chart which can be seen in defined common use areas.

## 7. CONFIDENTIALITY

Any discussions on the individual requests which are not a part of the resolution process of the Request Management System are deemed inappropriate in terms of personal data privacy and corporate information security and are not tolerated. The responsible parties in Request Management System are also not allowed to discuss with others about the individual requests. The company is under no obligation to provide feedback on claims or reports made about another employee.

## 8. VIOLATIONS

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If an employee is found to have violated the grievance procedure policy, they will be subject to disciplinary action, up to and including termination. The severity of each case will determine the type of disciplinary action, which may include a verbal or written warning, suspension, and/or termination.

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