

ADÖKSAN's HUMAN RIGHTS POLICY

1. PURPOSE

The purpose of this Human Rights Policy ("Policy") is to create a guide reflecting our approach and standards towards fundamental human rights as ADÖKSAN in line with the Sustainable Development Goals, to emphasize the respect we show to human rights and the value we place on all our employees, and to emphasize human rights in our relations with all stakeholders. focused approach.

The policy is also in harmony with ADÖKSAN Code of Business Ethics, ADÖKSAN policies and our Values. Our in-house practices refer to the aforementioned ADÖKSAN Human Rights Policy and our ADÖKSAN Code of Business Ethics..

2. SCOPE

Our employees and managers in all countries where we operate are obliged to act in accordance with this Policy. We expect all our Business Partners with whom we have a relationship with the supply of goods or services to act in compliance with the principles and principles in this Policy, and we take the necessary steps to ensure this.

3. DEFINITIONS

The "United Nations (UN) Guiding Principles on Business and Human Rights" provide a global standard for countries and companies to investigate, prevent and correct human rights violations encountered in the course of business activities.

"The UN Universal Declaration of Human Rights (UDHR)" is a landmark document in the history of human rights. Prepared by representatives of different legal and cultural backgrounds from all parts of the world, the Declaration was declared by the UN General Assembly in Paris on 10.12.1948 as a common measure of success for all people and all nations, and is the first document emphasizing the universal protection of fundamental human rights.

"UN Global Compact" consists of 10 principles determined in the fields of a) human rights, b) labor standards, c) environment and d) anti-corruption. These principles guide companies to achieve their sustainability and risk management goals, and contribute to increased productivity, employee loyalty, brand awareness and access to new markets.

"Human Rights" refers to the rights peculiar to all people regardless of gender, race, color, religion, language, age, nationality, difference of opinion and wealth, and includes the right to an equal, free and dignified life.

"Business Partners" includes suppliers, customers, contractors and all kinds of representatives, subcontractors and consultants, institutions/organizations with which ADÖKSAN does business and other third parties.

The “Women's Empowerment Principles (WEPs)” are a set of principles that guide business on how to promote gender equality and women's empowerment in the workplace, the market and society (7 Principles in total). These principles, established by the UN Global Compact and UN Women, are based on the recognition that businesses have a share and responsibility in promoting gender equality and women's empowerment, in line with international labor and human rights standards.

The “Organization for Economic Development and Cooperation (OECD) Multinational Companies Guide” aims to develop a state-supported corporate responsibility behavior that will maintain the balance between competitors in the international market, and thus to increase the contribution of multinational companies to sustainable development.

The “International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work”, adopted in 1998 and amended in 2022, explains that all member states are obliged to respect, develop and support the following five principles in good faith, even if they have not ratified the relevant conventions. . These five principles are:

- Freedom of association and effective recognition of the right to collective bargaining,
- Elimination of all forms of forced or compulsory labor,
- Elimination of child labor actually,
- Eliminating discrimination in employment and work,
- A safe and healthy work environment.

4. GENERAL PRINCIPLES

As ADÖKSAN, under the guidance of the "**UN Universal Declaration of Human Rights (UDHR) (1948)**" and the "**UN Global Compact (UNGC) (2000)**" that we are committed to being a signatory of, universal human rights support towards our employees, all our Business Partners and other communities affected by our products or services. We adopt an understanding that respects their rights.

We consider human rights among the most important of our ethical principles, and we expect all our Business Partners to act in accordance with these principles and ADÖKSAN's Human Rights Policy. We guarantee the human rights issue in our contracts with all our Business Partners; We include provisions regarding full compliance with the principles and principles in this Policy, and the employees of our Business Partners to internalize these principles and principles and act accordingly, and we encourage them in this regard.

The international standards and principles we prioritize regarding Human Rights are listed below:

- UN Universal Declaration of Human Rights (UDHR) (1948)
- UN Global Compact (UNGC) (2000)
- UN Guiding Principles on Business and Human Rights (2011)
- ILO Declaration of Fundamental Principles and Rights at Work (1998)
- OECD Guide to Multinational Companies (2011)
- Women's Empowerment Principles (WEPs) (2011)

5. COMMITMENTS AND IMPLEMENTATION PRINCIPLES

Our basic principle is to create a healthy, safe, positive and professional working environment for our employees, to ensure its continuity and to protect all the rights of our employees.

We may also have additional standards that take into account disadvantaged groups who are more likely to suffer human rights violations. As ADÖKSAN, as stated in the "UN Guiding Principles on Business and Human Rights", the special conditions of groups (indigenous peoples; women; ethnic, religious and linguistic minorities; children; people with disabilities; migrant workers and their families) whose rights are explained in more detail in UN documents. we take into account.

In this direction, as ADÖKSAN, in accordance with ADÖKSAN Code of Business Ethics;

Diversity, Inclusion and Equal Opportunity

- Religion, language, race, nationality, ethnicity, belief, creed, color, age, sexual orientation among our employees in the business environment or in recruitment, placement, leaving, training, career, promotion, assignment, discipline, wage management and fringe benefits processes To display an inclusive, diversity, fair, ethical and egalitarian attitude without discrimination of gender, marital status, political opinion, being disadvantaged and any legally protected characteristics,
- To be the most preferred employer for all candidates who dedicate themselves to their work and can add value and protect the rights of their employees.,
- Absolutely not tolerating any form of discrimination,
- To care about the ideas of our employees and to create working environments where they can freely express themselves with a participatory approach.,

Prevention of Child Labor and Forced/Compulsory Labor

- We strongly oppose child labor that causes physical and psychological harm to children and deprives them of their right to education at any stage of our activities, and all forms of forced and compulsory labor, including modern slavery, bonded labor and human trafficking.
- Developing procedures for our Business Partners to avoid child labor and forced and compulsory labor practices.

Zero Tolerance for Harassment and Violence

- To provide our employees with a safe and safe working environment free from all kinds of abuse, abuse, intimidation, ill-treatment or physical, verbal, sexual/psychological harassment, bullying, threats and violence, and to take all necessary precautions and support them with procedures,

Working Hours, Pricing and Benefits

- To observe the compliance of the legal working hours, working conditions and overtime provisions determined by the laws and regulations applicable in the countries in which we operate,

- Establish remuneration competitively according to the industry and local labor market and pay all wages, including fringe benefits, in accordance with applicable laws and regulations,

Personal/Professional Development

- To maintain a long-term business relationship with our employees by continuously investing in their talents and personal/professional development through internal and external trainings,

Occupational health and Safety

- In accordance with the Occupational Health and Safety Legislation, in line with our "zero accident" goal, to provide a healthy and safe working environment for our employees and our Business Partners who are in our work areas for any reason, to take the necessary safety measures and to implement regular training and information activities,

Working Life Privacy

- To comply with national/international regulations and data privacy standards for the protection of personal data of our employees and Business Partners,

Respect for the Environment and Society

- In line with our sustainable growth and green transformation goals, with the awareness of our responsibility towards the environment and society, we analyze the environmental effects of our investment projects in accordance with national/international legislation,
- Being aware of the possible effects of our use of land and natural resources along our value chain on human rights, we aim to address this issue with special policies and practices, in parallel with our Quality and Environment Policy, to protect the environment and health through the effective use of energy, water and raw materials and the preference of renewable resources throughout our value chain. reducing the damage done,
- Paying attention to community access to water resources and safe drinking water, and to the protection of ecosystems and communities with appropriate sanitation,
- To accept our work as a part of society and to respect the rights of the communities affected by our activities, to be able to resolve local problems in the most appropriate way at the local level and to communicate with civil society representatives on human rights if necessary,

Complaint Mechanism

- We undertake to make arrangements through contracts and to use our existing whistleblowing/complaint hotline mechanisms effectively in order to monitor and protect international legal requirements regarding human rights in supply chain practices by all our employees and Business Partners.

6. IMPLEMENTATION AND ENFORCEMENT

Our Human Rights Policy was published on 18.11.2022 with the approval of our General Manager. This policy is regularly reviewed by our Ethics Committee at least once a year, focusing on current requirements and changes in our operating conditions. Updates/revisions deemed necessary take effect after being approved by our General Manager upon the recommendation of our Ethics Committee. Our General Manager is at the highest level responsible for ensuring compliance with this Policy and regular follow-up of possible violations and suspicious situations within the scope of improvements.

Any employee who believes that there is a conflict between the language of the policy and our activities, has questions about this policy, or wishes to report a potential violation of this policy confidentially, can raise these questions and concerns to the Human Resources Manager or Legal Unit Manager.

In addition, we use our existing notification/complaint mechanism effectively to ensure compliance with this Policy and to ensure regular follow-up of possible violations and suspicious situations within the scope of improvements, and strive to evaluate the business processes of our Business Partners, from whom we provide goods/services, within the scope of their commitments to international organizations in terms of human rights. we show. Policy-related feedback and possible Policy violations and non-compliance can be reported via etik@adoksan.com.

In case of detection of violations and suspicious situations contrary to the principles and principles in this Policy, criminal sanctions may be applied in accordance with the provisions of the relevant legislation.

Our ADÖKSAN Human Rights Policy is made available to all our stakeholders and employees through our corporate website.