



KOÇZER

HUMAN RIGHTS POLICY

TABLE OF CONTENTS

1.	PURPOSE AND SCOPE	3
2.	DEFINITIONS	3
3.	AUTHORITY AND RESPONSIBILITIES.....	4
4.	GENERAL PRINCIPLES	5
5.	COMMITMENTS.....	5

1. PURPOSE AND SCOPE

This Human Rights Policy (“**the Policy**”) is a guide that reflects KoçZer’s approach and standards in relation to human rights and shows the importance KoçZer attributes to respect for human rights.

All employees and directors of KoçZer’s hall comply with this Policy. KoçZer also expects and takes necessary steps to ensure that all its Business Partners - to the extent applicable - complies with and/or acts in line with this Policy.

2. DEFINITIONS

“**Business Partners**” include suppliers, any representatives, subcontractors and consultants acting on behalf of the company.

“**Human rights**” are rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, difference of thought, and wealth. This includes the right to an equal, free and dignified life, among other human rights.

“**The ILO**” means The International Labor Organization.

“**Koç Group**” means Koç Holding A.Ş., companies which are controlled directly or indirectly, jointly or individually by Koç Holding A.Ş. and the joint venture companies listed in its latest consolidated financial report.

“**The OECD**” means The Organization for Economic Co-operation and Development

“**The OECD Guidelines for Multinational Enterprises**”¹ aims to develop a state-sponsored corporate responsibility behavior that will maintain the balance between competitors in the international market, and thus, increase the contribution of multinational companies to sustainable development.

“**Worst Forms of Child Labour Convention (Convention No. 182)**”² means the ILO Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour.

“**The UN**” means the United Nations.

“**The UN Global Compact**”³ is the pact based on the universally accepted declarations of the UN on the fields of social responsibility and sustainability practices, addressing 10 fundamental responsibilities of business in the areas of human rights, labor, environment and anti-corruption.

“**The UN Guiding Principles on Business and Human Rights**”⁴ is a set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations.

¹ <http://mneguidelines.oecd.org/annualreportsontheguidelines.htm>

² https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

³ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

⁴ https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

“The Universal Declaration of Human Rights (UDHR)”⁵ is a milestone document in the history of human rights, drafted by representatives with different legal and cultural backgrounds from all regions of the world, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected.

“The ILO Declaration on Fundamental Principles and Rights at Work”⁶ is an ILO declaration adopted that commits all member states whether or not they have ratified the relevant Conventions, to respect, and promote the following four categories of principles and rights in good faith:

- freedom of association and effective recognition of collective bargaining,
- elimination of all forms of forced or compulsory labor,
- abolition of child labor,
- elimination of discrimination in employment and occupation.

“The Women’s Empowerment Principles (WEPs)”⁷ a set of Principles offering guidance to businesses on how to promote gender equality and women’s empowerment in the workplace, marketplace and community. Established by UN Global Compact and UN Gender Equality and Women’s Empowerment Unit, these principles are grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women’s empowerment in accordance with international labor and human rights standards.

3. AUTHORITY AND RESPONSIBILITIES

All employees and directors of KoçZer are responsible for complying with this Policy, implementing and supporting the KoçZer’s procedures and controls in accordance with the requirements in this Policy. KoçZer also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable complies with and/or acts in line with this Policy.

If there is a discrepancy between the local regulations applicable in the countries where KoçZer operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, shall prevail.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law Koç Group or KoçZer Code of Conduct, you may seek guidance or report this incident to your line managers. You may alternatively report the incident to KoçZer’s Ethics Hotline via the following link: “<https://www.koczer.com/etik-hatti>”

KoçZer employees may consult KoçZer Human Resources and Corporate Communication Department in KoçZer for their questions related to this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

Human Resources and Corporate Communication Department is responsible for updating the Policy.

⁵ <https://www.un.org/en/universal-declaration-human-rights/>

⁶ <https://www.ilo.org/declaration/lang--en/index.htm>

⁷ <https://www.weps.org/about>

4. GENERAL PRINCIPLES

As a globally acting establishment, KoçZer takes the Universal Declaration of Human Rights (UDHR) as its guide and maintains a respectful understanding of Human Rights for its stakeholders in countries where it operates. Creating and maintaining a positive and professional working environment for its employees is the main principle of KoçZer. KoçZer acts in compliance with the global ethical principles in subjects such as recruitment, promotion, career development, wage, fringe benefits, and diversity, and respects its employees' rights to form and join organizations of their own choosing. Forced labor and child labor and all forms of discrimination and harassment are not tolerated in any way.

KoçZer primarily takes into consideration the below mentioned international standards and principles regarding Human Rights:

- The ILO Declaration on Fundamental Principles and Rights at Work (1998),
- The OECD Guidelines for Multinational Enterprises (2011),
- The UN Global Compact (2000),
- The UN Guiding Principles on Business and Human Rights (2011),
- The Women's Empowerment Principles (2011).
- Worst Forms of Child Labour Convention (Convention No. 182), (1999)

5. COMMITMENTS

KoçZer respects the rights of its employees, shareholders, Business Partners, customers, and all other individuals affected by its operations, products or services by fulfilling the principles of the Universal Declaration of Human Rights (UDHR) and the ILO Declaration on Fundamental Principles and Rights at Work.

KoçZer undertakes to treat all employees in an honest and fair manner, and to provide a safe and healthy working environment that respects human dignity while avoiding discrimination.

KoçZer may also apply additional standards considering vulnerable and disadvantaged groups who are more likely to suffer Human Rights violations. KoçZer considers the specific circumstances of groups whose rights are further elaborated by United Nations instruments (indigenous peoples; women; ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families) as indicated in the UN Guiding Principles on Business and Human Rights.

Diversity and Equal Recruitment Opportunities

KoçZer strives to employ individuals with different cultures, career experiences and backgrounds. Decision making processes in recruitment depend on job requirements and personal qualifications regardless of race, religion, nationality, gender, age, civil status and disability.

Non-Discrimination

Zero-tolerance towards discrimination is a key principle in the entire employment process, including promotion, assignment and training. KoçZer expects all its employees to demonstrate the same sensibility in their behaviours towards each other.

KoçZer cares to treat its employees equally by offering equal rights and opportunities. All kinds of discrimination and disrespect founded on race, gender, colour, national or social origin,

ethnicity, religion, age, disability, sexual orientation or political opinion are unacceptable.

Zero Tolerance to Child / Forced Labor

KoçZer strongly opposes child labor, which causes children's physical and psychological harm, and interferes with their right to education. In addition, KoçZer opposes all forms of forced labor, which is defined as work that is performed involuntarily and under the menace of any penalty.

Pursuant to Conventions and Recommendations of the ILO, the Universal Declaration of Human Rights, and the UN Global Compact, KoçZer has a zero-tolerance policy towards slavery and human trafficking and expects all its Business Partners to act accordingly.

Freedom of Organization and Collective Agreement

KoçZer respects employees' right and freedom of choice to join a trade union, and to collectively bargain without feeling any fear of retaliation. KoçZer is committed to a constructive dialogue with the freely chosen representatives of its employees, represented by a legally recognized labor union.

Health and Safety

The protection of health and safety of the employees, and other persons which are, for any reason, present in a work area is one of the top concerns of KoçZer. KoçZer provides a safe and healthy working environment. KoçZer takes necessary security measures in workplaces in a manner that respects the dignity, privacy, and reputation of each person. KoçZer complies with all relevant regulations and implements all required security measures for all its working areas.

In the case of finding out any unsafe conditions or unsafe behaviours in the working areas, KoçZer takes necessary actions immediately to ensure the health, safety, and security of its customers and employees.

Zero Tolerance to Harassment and Violence

A key aspect to safeguarding the personal dignity of employees is to ensure that harassment or violence does not occur or is sanctioned adequately if it occurs. KoçZer is committed to providing a workplace free of insecure or disturbing conditions, where violence and harassment is not tolerated. As such, KoçZer does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats.

Working Hours and Wages

KoçZer complies with the legal working hours in line with the local regulations of the countries where it operates. A great importance is attached to ensuring that employees have regular breaks, vacations, and establish an efficient work-life balance.

The wage determination process is established in a competitive manner according to the relevant sectors and the local labor market, and in accordance with the terms of collective bargaining agreements if applicable. All wages, including social benefits are paid in accordance with the applicable laws and regulations.

Employees may request further information from the KoçZer Legal and Compliance Department

regarding the laws and regulations that regulate working conditions.

Personal Development

KoçZer provides its employees with opportunities to develop their talent and potential, and to build their skills. Regarding human capital as a valuable resource, KoçZer puts effort into the employees' comprehensive personal development by supporting them with internal and external trainings.

Data Privacy

In order to protect the personal information of its employees, KoçZer maintains a high level of data privacy standards. Data privacy standards are implemented in accordance with related legislations.

KoçZer expects the employees to comply with data privacy laws in each of the countries it operates.

Political Activities

KoçZer respects its employees' legal and voluntary political participations. However, employees must engage in political activities outside working hours and refrain from using KoçZer's resources for such activities.