

COMPLIANCE

HUMAN RIGHTS POLICY

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1. PURPOSE AND SCOPE

The purpose of this Human Rights Policy ("Policy") is to establish a guide that reflects Egebant's approach, standards, and principles regarding Human Rights, to emphasize the importance Egebant places on Human Rights, and to provide guidance to its employees and business partners on this matter.

All employees and managers of Egebant are obliged to act in accordance with the principles and standards adopted in this Policy

2. DEFINITIONS

"UN Guiding Principles on Business and Human Rights"¹, refer to a guidance document for countries and companies on examining, preventing, and remedying human rights violations encountered in business activities.

"UN Global Compact"², refers to the agreement based on universally accepted UN declarations addressing ten fundamental responsibility areas of the business world in the fields of human rights, labor standards, environment, and anti-corruption, aimed at social responsibility and sustainability practices.

"Worst Forms of Child Labour Convention (No. 182)"³, refers to the ILO convention on the prohibition and immediate action for the elimination of the worst forms of child labor.

"ILO" refers to the International Labour Organization.

"ILO Declaration on Fundamental Principles and Rights at Work"⁴, refers to the ILO Declaration stating that all member states, even if they have not ratified the relevant conventions, are obliged in good faith to respect, promote, and realize the following four principles:

- Freedom of association and the effective recognition of the right to collective bargaining,
- Elimination of all forms of forced or compulsory labor,
- Effective abolition of child labor,
- Elimination of discrimination in respect of employment and occupation.

"Human Rights" refer to the rights inherent to all human beings without distinction of gender, race, color, religion, language, age, nationality, difference of opinion, or property, and include the right to an equal, free, and dignified life.

² <https://www.unglobalcompact.org/what-is-gc/mission/principles>

³ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

⁴ <https://www.ilo.org/declaration/lang-en/index.htm>

"Universal Declaration of Human Rights"⁵ is a milestone document in the history of Human Rights. Drafted by representatives from all regions of the world with different legal and cultural backgrounds, the Declaration was proclaimed by the UN General Assembly in Paris on December 10, 1948, as a common standard of achievement for all peoples and all nations, and is the first document to emphasize the universal protection of fundamental Human Rights.

"Business Partners" include suppliers, distributors, all kinds of representatives acting on behalf of the Company, subcontractors, and consultants.

"Women's Empowerment Principles (WEPS)"⁶ are a set of principles guiding businesses on how to promote gender equality and women's empowerment in the workplace, marketplace, and community. Developed by the UN Global Compact and UN Women, these principles are based on the recognition that businesses have a role and responsibility in advancing gender equality and women's empowerment in line with international labor and human rights standards.

3. GENERAL PRINCIPLES

As a globally operating company, Egebant takes the Universal Declaration of Human Rights as its guide and adopts an approach that respects Human Rights toward its stakeholders in the societies where it operates. Creating and maintaining a positive and professional working environment for its employees is a fundamental principle of Egebant. Egebant acts in accordance with global ethical principles in recruitment, promotion, career development, compensation, benefits, and diversity, and respects employees' rights to establish and join civil society organizations of their own choice. Egebant has zero tolerance for forced labor, child labor, any form of discrimination, and harassment.

Egebant gives priority to the following international standards and principles regarding Human Rights:

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

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

⁶ <https://www.weps.org/about>

4. COMMITMENTS

Egebant endeavors to respect the rights of its employees, shareholders, Business Partners, customers, and all others affected by its products or services by fulfilling the principles of the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

Egebant treats all employees honestly and fairly, assumes responsibility for providing a working environment that respects human dignity and is safe and healthy, and does not become complicit in human rights violations.

Egebant may apply additional standards for disadvantaged groups who are more likely to be exposed to human rights violations. In line with the UN Guiding Principles on Business and Human Rights, Egebant takes into account the special conditions of groups whose rights are detailed in UN documents, including indigenous peoples, women, ethnic, religious and linguistic minorities, children, persons with disabilities, and migrant workers and their families.

Diversity and Equal Employment Opportunities

Egebant seeks to employ individuals from different cultures, experiences, and backgrounds. Recruitment decisions are based on job requirements and personal qualifications, regardless of race, religion, nationality, gender, age, marital status, or disability.

Egebant promotes cultural diversity and equal opportunity in the workplace by recognizing performance and contributions to corporate success.

Prevention of Discrimination

A zero-tolerance policy toward discrimination is a fundamental principle in all recruitment, promotion, assignment, and training processes. Egebant expects all employees to act with the same sensitivity in their behavior toward one another.

Egebant strives to treat employees equally by providing equal pay for equal work, equal rights, and equal opportunities. No form of discrimination or disrespect based on race, gender (including pregnancy), color, nationality, religion, age, disability, sexual orientation, family status, sensitive medical conditions, union membership and activities, or political opinion is tolerated.

All individuals employed by or present within Egebant equally benefit from legally recognized rights and freedoms.

Zero Tolerance for Child Labor and Forced Labor

Egebant strongly opposes child labor that harms children physically or psychologically and deprives them of their right to education, and in line with the ILO Declaration on Fundamental Principles and Rights at Work, does not employ child labor.

Egebant is also opposed to all forms of forced labor, defined as work performed involuntarily and under threat. Employees are not required to work against their will, and all employment is based on voluntary consent and in compliance with legal requirements.

In accordance with ILO conventions and recommendations, the Universal Declaration of Human Rights, and the UN Global Compact, Egebant applies zero tolerance toward slavery and human trafficking and expects all Business Partners to act accordingly.

Freedom of Association and Collective Bargaining

Egebant respects employees' rights to join trade unions and engage in collective bargaining without fear of retaliation.

Egebant commits to maintaining constructive dialogue with freely chosen representatives of employees who are represented by a legally recognized trade union.

Health and Safety

Protecting the health and safety of employees and any other persons present at Egebant workplaces is one of Egebant's top priorities. Egebant provides a safe and healthy working environment. Security services are provided, when necessary, in a lawful manner that respects each individual's dignity, privacy, and reputation. Egebant complies with relevant legislation and ensures necessary safety standards in all workplaces.

Creating a safe and healthy work environment and complying with occupational health and safety legislation and internal requirements are essential.

If unsafe conditions or behaviors are identified, Egebant immediately takes necessary measures to protect the health, safety, and security of employees and customers.

Zero Tolerance for Harassment and Violence

An important way to protect employees' personal dignity is to take necessary precautions to prevent harassment and violence and to apply appropriate sanctions if such incidents occur. Egebant commits to providing a working environment free from violence, harassment, threats to safety, or disturbing conditions. Therefore, no form of physical, verbal, sexual, or psychological harassment, bullying, abuse, or threats is tolerated.

Working Hours, Wages, and Employee Rights

Egebant complies with local legal working hour limits to avoid exceeding maximum weekly working hours. At Egebant, employees are encouraged to take regular breaks and leave, and to maintain a productive work-life balance.

Wage determination processes are competitive in accordance with the relevant sector and local labor market, and in line with collective bargaining agreements where applicable. All wages, including social benefits, are paid in compliance with applicable laws and regulations.

Personal Development

Egebant provides opportunities for employees to develop their skills and potential. Viewing human capital as a valuable resource, Egebant supports employees through internal and external training programs and strives to contribute to their comprehensive personal development.

Data Privacy

Egebant applies data protection standards to protect employees' personal information. Data privacy standards are implemented in compliance with legal regulations.

Egebant expects its employees in every country of operation to comply with applicable data protection laws.

Political Activities

Egebant respects all lawful and voluntary political participation of employees. However, employees must conduct political activities outside working hours and refrain from using Egebant resources for such activities. Conducting political activities in the name of Egebant or involving Egebant in political activities is not permitted.

5. AUTHORITY AND RESPONSIBILITIES

All employees and managers within Egebant are responsible for complying with this Policy and for implementing and supporting relevant procedures and controls in line with the requirements of this Policy. To the extent applicable to the relevant parties and transactions, Egebant expects all Business Partners to comply with this Policy and takes necessary actions to ensure such compliance.

If you become aware of any action that you believe violates this Policy, applicable legislation, or the Egebant Code of Business Ethics, you should report it through the Company's ethics channels listed below:

Ethics Line – WhatsApp
or via the Ethics Reporting Form at:
<https://www.egebant.com.tr/tr/kurumsal/etik-form>

The Human Resources Department is responsible for the implementation of this Policy.

Egebant employees may consult the Human Resources Department with questions regarding the application of this Policy. Violation of this Policy by an employee may result in serious disciplinary actions, including termination of employment as a last resort. If any third party expected to comply with this Policy acts in violation of it, relevant contracts may be terminated.