



ANADOLU GROUP

## ANADOLU GROUP HUMAN RIGHTS POLICY

### 1. PURPOSE AND SCOPE

AG Anadolu Grubu Holding A.Ş. ("**AGHOL**") and its Group companies operating in various sectors under AGHOL ("**Anadolu Group**") are committed to the value of respecting human rights. In every country where it operates, Anadolu Group promotes the protection of human rights in its relationships with employees, suppliers, stakeholders, and business partners, as well as in its business processes. This approach aligns with its sustainability strategy. Anadolu Group aims to foster a sustainability culture among its employees and sets an example for the business ecosystem in its regions of operation. Anadolu Group has developed this Human Rights Policy ("**Policy**") to reflect its approach and standards regarding human rights, emphasize its commitment to this issue, and provide a guided document.

The Policy has been prepared in accordance with the United Nations Global Compact Principles, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Standards, the Women's Empowerment Principles, and the OECD Guidelines for Multinational Enterprises.

### 2. FUNDAMENTAL PRINCIPLES

Anadolu Group Human Rights Policy is based on the following fundamental principles:

#### 2.1. Diversity, Equity, and Inclusion

- Work to maintain workplaces free from arbitrary discrimination on the basis of race, language, religion, gender, sexual orientation, age, marital status, ethnic origin, political opinion, social and economic status, nationality, disability, or other factors.
- Supports diversity and equal opportunities at all levels by creating a fair and inclusive working environment.
- Develops and promotes practices that support equal participation of individuals with disabilities in the workforce.

#### 2.2. Safe and Healthy Working Environment

- The safety and health of employees are of utmost importance; the Group implements occupational health and safety regulations to protect their well-being, both physically and psychologically.



- Identifies and mitigates risks that may cause accidents, injuries, or health issues to ensure a safe, healthy, and productive workplace with ongoing efforts for enhancement.

### **2.3. Work Hours, Wages, and Benefits**

- Provides fair wages for employees' efforts.
- Complies with applicable laws regarding wages, working hours, overtime, and benefits.
- Offers employees opportunities to develop their talents, enhance their potential, and progress in their careers.
- Listens to employees regarding working conditions, establishes communication channels for feedback, and takes necessary actions accordingly.

### **2.4. Prevention of Forced Labor and Child Labor**

- Prohibits all forms of forced labor, including child labor, prison labor, bonded labor, military labor, modern slavery, and any form of human trafficking.
- Encourages suppliers and business partners to comply with these principles.
- Conducts regular audits and awareness activities to prevent the risk of child labor.

### **2.5. Prevention of Violence and Harassment**

- Does not tolerate violence, harassment, or any other unsafe or disturbing conditions arising from internal or external threats.
- Develops and implements processes to prevent all forms of physical, psychological, sexual, and racial harassment, as well as mobbing.

### **2.6. Trade Union Rights and Freedom of Unionization**

- Commits to establish a constructive dialogue with freely elected representatives of employees represented by a legally recognized trade union.
- Ensures that no employee is discriminated against for utilizing their right to unionize.



## **2.7. Environmental and Social Responsibility**

- Implements environmentally sustainable policies that are sensitive to human rights in its operations.
- Respects the rights of communities and invests in projects that provide social benefits.

## **2.8. Protection of Personal Data and AI Processes**

- Fully complies with relevant regulations regarding processing, storage, and sharing of personal data.
- Takes necessary precautions to ensure that personal data is used within legal and ethical boundaries in artificial intelligence algorithms.

## **3. REPORTING MECHANISMS AND MONITORING**

- There is zero tolerance for retaliation or adverse action against any employee who reports concerns about Policy violations.
- Establishes and promotes confidential reporting mechanisms where concerns can be safely raised.
- Develops and implements effective monitoring and reporting systems to prevent Policy violations.
- Conducts awareness training sessions.
- Declarations are evaluated with sensitivity under [the Code of Business Ethics and Non-Compliance Notification Regulation](#). All employees and all other stakeholders can submit reports, anonymously if they wish, to the Ethics Committee via the email address [anadolugrubu@speak-hub.com](mailto:anadolugrubu@speak-hub.com) or the phone line +90 212 401 30 66.

## **4. IMPLEMENTATION AND MONITORING**

- Each Anadolu Group company prepares its own policy aligned with the Policy or updates its existing policy as needed.
- Regularly conducts human rights risk assessments.
- Conducts internal and external audits to monitor Policy implementation.
- Takes corrective and preventive actions against Policy violations.



- Compliance with and monitoring of the Policy are carried out in accordance with the Code of Business Ethics and Non-Compliance Notification Regulation.

## **5. ENFORCEMENT**

This Policy has been prepared as an annex to the Code of Business Ethics and Non-Compliance Notification Regulation. The Policy came into effect following the decision of AGHOL Board of Directors dated **January 29, 2025**, and will be periodically reviewed and updated in line with global and local needs and developments.