

ZORLU GROUP

HUMAN RIGHTS POLICY



Purpose and Scope

With its responsible investment holding approach, Zorlu Holding is the leading producer of goods in various industries from textile to consumer electronics and white goods, from energy to real estate and mining-metallurgy. As an innovative company, Zorlu Holding adopts and works with a sustainability-oriented approach for building a better future.

Zorlu Holding and all its Affiliates (Zorlu Group) undertake to conduct business and take actions in full compliance with Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, Declaration on Fundamental Principles and Rights at Work adopted by International Labor Organization (ILO) and, as a signatory party, United Nations Global Compact. Zorlu Group, together with its subsidiaries, is committed to respecting and protecting human rights for all its employees and stakeholders in the different countries and cities where it operates.

Zorlu Holding respects the rights and values of all employees with a view to giving life to people's dream for a sustainable and smart future within the scope of Smart Life 2030 sustainability vision.

Human Rights Policy set forth in the document hereby is in integrity with Zorlu Holding Ethical Principles, Zorlu Group policies and values. Internal practices take aforementioned Human Rights Policy and Ethical Principles as a reference.

Human Rights Policy covers all Zorlu Group employees, members of the Board of Directors, suppliers and business partners, intermediaries, contractors, contractors acting by proxy and all third parties with whom Zorlu Group conducts business. The aforementioned real and legal entities are expected to abide by Human Rights Policy. With a view to promote not only employees but also business partners and suppliers to act in accordance with Human Rights Policy hereby, Zorlu Holding communicates Human Rights Policy and attaches it to contracts.

Principles, Commitments and Related Practices

As Zorlu Holding and Zorlu Group affiliate companies, we;

- Embrace equal opportunities and respect diversity. Engage in efforts to enhance women's representation, employment of different generations and disabled employees as part of our diversity practices. We maintain an equal stance towards any person during processes including hiring, training and development, career, performance and wage management and in the workplace regardless of the person's gender, pregnancy, ethnic origin, religion, race, national origin, age, disability, marital status, sexual orientation, political views and so forth.

- Show zero tolerance against any disrespectful treatment and indignities in the workplace such as mistreatment, intimidation, verbal and physical harassment and provide a safe working space to our employees. In case of such an incident, we investigate it carefully and with utmost care and make sure that the process is concluded in a fair and prompt manner.
- Support our employees to communicate with each other in a way that is not perceived as mistreatment or harassment in or outside the workplace and does not disrupt the workplace environment.
- Care about our employees' opinions and create working spaces where such opinions can be freely expressed.
- Do not tolerate child labour or forced labour. Conduct our business in compliance with the applicable legislation of the country we operate in and in accordance with the relevant provisions of ILO Conventions.
- Provide a work environment that complies with the relevant legislation, particularly the legislation on Occupational Health and Safety. Raise awareness in our human resource so as to provide and maintain a safe and healthy workplace for our employees and business partners.
- Pay regard to working conditions and hours. Comply with the working conditions set forth in the applicable legislation in the countries where we conduct business.
- Do not take initiatives that may cause criminal offense or violation of rights in the countries where we conduct business. We expect our employees to act in the same manner.
- Respect the rights of communities that may be affected by the actions taken by Zorlu Group. Actively strive to identify and avoid all adverse effects on human rights and to evaluate and prevent risks.

Enforcement

Human Rights Policy entered into force on March 16, 2022 upon the sign-off by Zorlu Holding Chief Executive Officer. The policy is also accessible via “Zone”, our corporate in-house communication portal.

Zorlu Holding Human Resources Group Head is under the obligation for providing awareness of Human Rights Policy. At the highest level, CEO is liable for Human Rights Policy. Group affiliates' top executives are responsible for the execution of Human Rights Policy.

Breach of provisions set forth by Human Rights Policy causes not only administrative and penal sanctions with the relevant legislation, but also internal sanctions, as well.

In case of any uncertainty regarding the content of the Human Rights Policy and/or witnessing any behaviours or practices that violate the rules, all employees and stakeholders may report / complain the case or consult the Ethical Principles Hotline as to;

- They can access Ethical Principles Hotlines via e-mail (etik@zorlu.com).
- or via telephone (+90 212 456 23 23) or (+90 850 226 23 23) at all hours.

Ultimate privacy / confidentiality policy is essential for the employees/persons reporting the violation within the scope of legal/statutory and administrative requirements.

The Ethical Committee established by the Board of Directors is authorized and responsible for evaluating and resolving any complaint, report and allegation submitted to Ethical Principles Hotlines. In this context, reported violation / case is assessed by Zorlu Holding Audit Group Head. The Internal Audit and Ethics Department under Zorlu Holding Audit Group Head carries out all necessary examinations, inspections or investigations about the complaints, allegations or violations submitted to the Ethical Principles Hotlines.

Should the need arise, Human Rights Policy shall be revised. Human Rights Policy's update is subject to the consultations to Zorlu Holding Human Resources Group Head, Legal Group Head, Audit Group Head and Corporate Communications and Sustainability General Directorate are consulted.