HUMAN RESOURCES POLICY

1) Purpose

The purpose of the Human Resources Policy (hereinafter referred to as the "Policy") is to establish the methods to be applied in order to maximize the efficiency of the work performed by employees of Erciyes Çelik Halat A.Ş. (hereinafter referred to as the "Company") in areas such as recruitment and placement, compensation, training, career development, performance management, and employee separation.

2) Definitions

This section briefly explains the specific terms and concepts used in politics as follows.

Company: Erciyes Çelik Halat Tel Sanayi ve Ticaret A.Ş.

Policy: Human Resources Policy

Employee: Refers to company managers and employees.

3) Scope

3.1) This Policy covers:
Members of the Company's Board of Directors,
Employees of the Company,
Companies from which goods and services are procured and their employees,
Other persons, including those with whom the Company has commercial relationships—such as customers—and individuals and entities acting on behalf of the Company, including consultants, attorneys, advisors, and external auditors (collectively referred to as "Business Partners").

4) Principles and Guidelines

4.1) The Company's primary objective is to be an organization composed of employees who take pride and satisfaction in being part of it, have achieved a high level of awareness and responsibility, are specialized in their work, and have embraced a disciplined approach to their duties. In line with this objective:

4.1.1) To recruit, train, develop, and retain individuals who adopt and live by the Company's principles, which constitute a holistic approach embedded in its operations and DNA (Build Trust, Win Hearts, Deliver Results, Be the Best, Understand Your Customer, Seize the Future, Add Meaning, Empower, and Guide), while ensuring equal opportunity.

4.1.2) To create a suitable environment that supports employees' personal and professional development.

4.1.3) To recognize individual differences as a human capital asset and adopt a fair approach in accordance with our ethical values.

4.1.4) To provide a more peaceful and safe working environment by fully respecting employees' legal rights and obligations.

4.1.5) To maintain a human resources system that increases the satisfaction and engagement of the current workforce and makes the Company the employer of choice for potential talent.

4.1.6) To evaluate employee performance using objective criteria.

4.1.7) To reward high performance, provide accurate and constructive feedback on underperforming areas, and support employee development.

4.1.8) To develop approaches that enhance employee motivation and engagement.

4.1.9) The Human Resources Department commits, under the leadership of the Board of Directors, to implement, develop, improve, and manage all these objectives.

5) Roles and Responsibilities

5.1) Board of Directors

5.1.1) The Board of Directors is responsible for the overall oversight of the development, implementation, and updating of the Policy.

5.1.2) The Board of Directors is also responsible for the oversight of the Ethics Committee and the Internal Audit Department, which operate the reporting, investigation, and enforcement mechanisms in cases of violations or suspicious situations that contravene the principles and provisions of the Policy.

5.2) Ethics Committee

5.2.1) The Ethics Committee is responsible for managing the communication channels necessary for reporting violations or suspicious situations that contravene the principles and provisions of the Policy. It also takes measures to ensure the confidentiality and security of individuals making such reports.

5.2.2) The Ethics Committee carefully reviews incoming complaints and reports and initiates the necessary investigations. If a rule violation is identified as a result of the investigation, it submits the matter, along with relevant evidence and documentation, to the Internal Audit Department. The Ethics Committee also

implements the necessary measures and establishes mechanisms to prevent the recurrence of the same violation.

5.3) Internal Audit Department

5.3.1) The Internal Audit Department conducts objective assessments regarding situations that may result in disciplinary action, in accordance with applicable regulations, in cases where violations or suspicious situations contravene the principles and provisions outlined in the Policy.

5.4) Human Resources Department

5.4.1) The Human Resources Department is responsible, on behalf of the Board of Directors, for the preparation, implementation, and development of this Policy. The HR Department evaluates the Policy as needed in terms of currency and improvement requirements and provides recommendations to the Board of Directors.

5.5) Employees

5.5.1) Employees are responsible for complying with this Policy as well as the supporting procedures, regulations, and instructions. They must report any behavior, activity, or practice that contravenes the Policy through the Ethics Hotline.

6) Communication

6.1) All behaviors and practices that violate the principles set forth in the Policy must be reported to the Ethics Committee via the Ethics Hotline. The Ethics Committee is obligated to respond to all notifications received through the Ethics Hotline within three business days.

Ethics Hotline:

Email: etik@ech.com.tr

Address: Mimarsinan Organize Sanayi Bölgesi 19. Cadde No:32 Melikgazi/Kayseri

7) Effective Date

7.1) This Policy has been enacted by the resolution of the Board of Directors dated XX and shall remain in effect and valid until a new announcement is made.

8) Review

8.1) This Policy is reviewed annually by the Ethics Committee, based on controls related to process or technical infrastructure changes. The reviewed and updated Policy is approved by the Board of Directors.

Related Policies and Procedures

- Etik Kurallar Politikası (Code of Ethics Policy)
- İnsan Hakları Politikası (Human Rights Policy)
- PR-01-01 İşe Alım ve Rotasyon Prosedürü (PR-01-01 Recruitment and Rotation Procedure)
- PR-01-03 Ücret ve Yan Haklar Prosedürü (PR-01-03 Compensation and Benefits Procedure)
- PR-01-06 Terfi Prosedürü (PR-01-06 Promotion Procedure)
- TL-01-02 İşe Başlama-İşten Ayrılma-Atama Yazışmaları Talimatı (TL-01-02 Instruction on Hiring, Termination, and Appointment Correspondence)