HUMAN RIGHTS POLICY

1) Purpose

1.1) The Human Rights Policy (hereinafter referred to as the “Policy”) aims to establish a guideline for employees, business partners, suppliers, and the entire value chain by defining the human rights rules and principles adopted and implemented by Erciyes Çelik Halat A.Ş. (hereinafter referred to as the “Company”) in the course of conducting its operations.

1.2) This Policy has been prepared based on the Universal Declaration of Human Rights, the United Nations (UN) Global Compact (UNGC), the UN Convention on the Rights of the Child, core International Labour Organization (ILO) Conventions, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and applicable local regulations.

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 Rights 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 complies with global human rights standards, societal values, and local regulations concerning human rights and employee rights in all of its operations.

4.2) Respect for Human Rights

4.2.1) The Company acts in accordance with universal human rights in its relations with employees, business partners, customers, competitors, and the communities in which it operates, and expects the same understanding to be reciprocated.

4.3) Child Labor and Forced Labor

4.3.1) The Company does not tolerate child labor, illegal and/or forced labor, mistreatment of employees, undeclared employment, or any other practices and behaviors that violate human rights or legal regulations.

4.4) Violence and Mistreatment

4.4.1) The Company is committed to providing a safe, respectful, and dignified environment for all employees. Our employees are obliged not to engage in physical or psychological violence or mistreatment against anyone for any reason and not to condone such behavior by others. Attempts to instill fear, intimidate, or threaten, even if no action is taken, are considered within the same scope. No form of physical, verbal, sexual, or psychological harassment, abuse, or threat is tolerated.

4.5) Diversity, Equity, and Inclusion

4.5.1) The Company is committed to providing its employees with a work environment where they feel fully included, regardless of their differences, and where everyone respects each other's rights and dignity in all interactions. Recruitment, placement, career development, training, compensation, and promotion decisions are made solely based on the employee's qualifications, performance, skills, and experience.

4.5.2) The Company ensures that its internal and external communications uphold the principles of diversity, equity, and inclusion, and excludes any elements that contradict fundamental societal values.

4.6) Discrimination

4.6.1) No discrimination is tolerated within the Company based on age, gender, race, color, language, religion, philosophical or political beliefs, ethnic origin, economic status, sexual orientation, health condition, disability, appearance, clothing, or lifestyle; any discriminatory behavior, action, or any form of retaliation is not tolerated.

4.7) Right to Collective Bargaining and Freedom of Association

4.7.1) Employees' freedom to organize and their right to collective bargaining, in accordance with applicable laws, are respected, and employees exercising these rights shall not be subjected to any pressure or discrimination.

4.8) Occupational Health and Safety

4.8.1) Occupational health and safety is a fundamental priority for the Company. The Company takes measures to minimize health and safety risks in its operations and activities and carries out continuous improvement through corrective, preventive, and enhancement actions. It complies with relevant legal regulations and meets all required standards. All employees are expected to follow the procedures related to occupational health and safety.

4.9) Freedom of Expression

4.9.1) The Company is committed to preventing any circumstances that would hinder employees' right to freedom of expression in the workplace and provides the necessary environment for employees to express themselves freely.

4.10) Working Hours, Compensation, and Employee Benefits

4.10.1) The Company establishes competitive compensation and employee benefits in accordance with industry dynamics, the local labor market, and the terms of applicable collective agreements. It conducts its operations in compliance with applicable laws regarding wages, working hours, overtime, and additional benefits. The Company aims to prevent excessive overtime by promoting activities that enhance employee productivity during working hours and supports the maintenance of a healthy work-life balance.

4.10.2) The Company fosters a productive and motivating work environment that continuously supports employee development and encourages opportunities for personal growth.

5) Roles and Responsibilities

5.1) Board of Directors

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

5.2) Ethics Committee

5.2.1) The Ethics Committee is responsible for establishing the necessary communication channels for reporting violations or suspicious situations that contravene the principles and provisions outlined in the Policy. It also takes

measures to ensure the confidentiality and security of individuals who make such reports.

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. When necessary, the Internal Audit Department takes preventive and corrective measures or provides recommendations to business units and the Human Resources Department.

5.4) Human Resources Department

5.4.1) The Human Resources Department is responsible for implementing the provisions outlined in the Policy within business processes and for carrying out activities to raise awareness throughout the organization. It also evaluates recommendations related to Human Rights received from the Internal Audit Department.

6) Communication

6.1) Violations or suspicious situations that contravene the principles and provisions outlined in the Policy are reported to the Ethics Committee via the Ethics Hotline. Provided that the reporting individuals do not act in bad faith, necessary measures are taken to ensure that no pressure or retaliation is directed against them, and violation reports are investigated in accordance with confidentiality principles. If, as a result of the investigation, a situation is determined to contravene the principles and provisions of the Policy, the Internal Audit Department may apply disciplinary measures to the responsible individual(s) in accordance with the principle of fairness.

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. It shall remain in effect and valid until a new announcement is made.

8) Review

8.1) This Policy is reviewed annually by the Sustainability Department, 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

- Code of Ethics Policy
- Sustainability Policy
- Human Resources Policy
- ISO 45001
- İSG-PL-04 Emergency Response Plan