

GLOBAL HUMAN RIGHTS POLICY

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Board of Directors



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GLOBAL HUMAN RIGHTS POLICY

INTRODUCTION

We recognize the importance of a consistent, effective, and transparent communication model in achieving global success in line with our corporate objectives. Therefore, we have established a comprehensive Global Human Rights Policy to ensure open, transparent, and trustworthy communication with all our stakeholders.

Through this policy, we respect universally recognized human rights in accordance with the Universal Declaration of Human Rights in all countries where we operate and aim to prevent human rights violations.

1. PURPOSE

This policy sets forth our approach, principles, and commitments regarding human rights in line with national and international regulations.

Through our Global Human Rights Policy, we aim to promote a culture that protects and advances human rights while fostering an inclusive and fair approach across all our operations and among all our stakeholders.

This Policy is based on the following internationally recognized frameworks and standards:

- Universal Declaration of Human Rights (UDHR)
- International Labour Organization (ILO) Conventions, including Convention No. 169
- United Nations Global Compact
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- United Nations Sustainable Development Goals (SDGs)
- The Company's Code of Ethics and Business Conduct

2. SCOPE

This policy applies to all our managers, employees, business partners, and suppliers in every country where we operate.

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3. CORE PRINCIPLES

We are committed to full compliance with all applicable national and international regulations and to making every effort to protect and promote human rights in the following areas.

3.1 Respect for Human Rights

We respect universally recognized human rights in accordance with the Universal Declaration of Human Rights and seek to prevent human rights violations in all countries where we operate.

We respect the rights of indigenous peoples in the countries where we operate, with reference to the United Nations Declaration on the Rights of Indigenous Peoples.

3.2 Freedom of Expression

We are committed to preventing any situation that may hinder our employees from exercising their right to freedom of expression in the workplace.

3.3 Equal Opportunity, Respect for Diversity and Inclusion

In all human resources processes, including recruitment, compensation, personal and professional development, as well as in the workplace environment, we provide equal treatment and do not tolerate discrimination based on gender, language, religion, race, ethnicity, sexual orientation, nationality, age, marital status, trade union membership, political opinion, or any other similar characteristic.

While adhering to the principle of placing the right person in the right job, we manage our processes transparently based on employees' qualifications, experience, performance, and competencies.

We respect diversity as an essential component of our organizational structure and culture.

3.4 Collective Bargaining and Freedom of Association

We respect our employees' rights to collective bargaining and freedom of association.

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3.5 Healthy and Safe Working Environment

Providing all employees with a safe, healthy, and satisfying working environment is among our top priorities.

We conduct all our activities with a “zero accident” objective and are committed to full compliance with international agreements and national regulations related to occupational health and safety.

Beyond legal requirements, we strive to implement and promote best practices in occupational health and safety.

3.6 Prevention of Abuse and Harassment

We do not tolerate any form of abuse, bullying (mobbing), harassment, intimidation, or other inappropriate behavior in the workplace.

3.7 Forced Labor and Human Trafficking

We strictly prohibit all forms of forced labor and human trafficking.

3.8 Child Labor

In line with the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, we strictly prohibit the employment of child labor.

3.9 Criminal Acts and Human Rights Violations

We do not engage in any activities that may result in criminal acts or violations of rights in the countries where we operate.

We expect the same level of sensitivity and compliance from our employees.

3.10 Industry-Specific Best Practices

We adopt human rights due diligence and risk assessment programs developed specifically for the energy sector and take into account the measurement and evaluation criteria established by such programs.

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4. COMPANY HUMAN RIGHTS SYSTEM

To fulfill our human rights commitments and objectives effectively, we establish the necessary systems, processes, controls, and reporting structures to identify, prevent, mitigate, and manage risks related to the issues covered by this Policy.

We periodically review our human rights practices and assess the effectiveness of our management systems.

To embed a culture of respect for human rights at all levels of the organization, we provide training, guidance, awareness, and support mechanisms for our employees.

We expect our business partners and customers to fully comply with the human rights principles and commitments outlined in this Policy.

We ensure that this Policy is communicated and understood by our employees and business partners and establish effective grievance and reporting mechanisms for potential human rights violations.

In cases where human rights violations occur, we take prompt and effective action to eliminate the violation and fulfill our responsibilities in ensuring that the relevant authorities take the necessary corrective and preventive measures against those responsible.

5. STAKEHOLDER FEEDBACK

We value the feedback and opinions of our stakeholders regarding this Policy.

Feedback related to this Policy, as well as reports concerning potential violations or non-compliance, may be submitted through our ethics reporting channels.

Ethics Hotline

+90 850 511 11 12

etik@aksa.com.tr

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