

ZORLU HOLDING

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. Zorlu, as a forward-thinking organization, takes a sustainability-focused approach to building a better future.

Zorlu Holding and all of its affiliates (Zorlu Group) committed to conduct business and act in accordance with the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Impact, as a signatory party. In the various locations and countries where it conducts business, Zorlu Group shows respect for human rights for all employees and stakeholders, and strives to protect such rights.

Within the scope of the Smart Life 2030 sustainability vision, Zorlu Holding respects the rights and values of all employees with the view to giving life to people's dream for a sustainable and smart future. Human Rights Policy set forth in the document hereby is in integrity with Zorlu Holding Ethical Principles, Zorlu Group policies and values. Internal practices shall be guided by the Human Rights Policy and Ethical Guidelines as a reference.

Human Rights Policy shall apply to 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 the Group conducts business. The Human Rights Policy is supposed to be followed by the aforementioned actual and legal entities. Zorlu Holding publishes the Human Rights Policy and attaches it to contracts in order to encourage not only employees but also business partners and suppliers to conduct in accordance with it.

Principle, Commitment and Related Practices

As Zorlu Holding and Zorlu Group affiliate companies,

- We embrace equal opportunity and respect diversity. As part of our diversity-promoting practices, we work to improve women's representation, the employment of various generations, and the employment of people with disabilities. We take 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 other factors.

- We have a zero-tolerance policy for workplace indignities such as ill treatment, intimidation, verbal and physical harassment and provide a safe working environment for our employees. In case of such an incident, we scrutinise it carefully and with utmost care and make sure that the process is concluded in a just and fast manner.
- We support our employees in communicating with co-workers both in and outside of workplace in a way that does not suggest any ill treatment or harassment and does not contravene workplace environment.
- We respect our employees' opinions and strive to establish environments in which they can freely express themselves.
- We do not tolerate child labour or forced labour. We 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.
- We provide a workplace that is in accordance with the relevant legislation, particularly the legislation on Occupational Health and Safety. We raise awareness in our human resource so as to provide and maintain a safe and healthy workplace for our employees.
- We pay particular regard to working conditions and hours. We comply with the working conditions specified in the applicable legislation in the countries where we conduct business.
- We 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.
- We respect the rights of communities that may be affected by the actions taken by Zorlu Group. We actively strive to identify and avoid all adverse effects on human rights and to evaluate and prevent risks.

Entry into Force

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 communication portal.

Zorlu Holding Human Resources Group is responsible for making sure employees have become aware of the Human Rights Policy. At the highest level, CEO is liable for Human Rights Policy. Group affiliates' executives are responsible for the execution of the Policy.

Breach of provisions set forth hereby causes not only administrative and penal sanctions but also internal sanctions.

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 the case or consult the Ethical Principles Hotline;

- They can access Ethical Principles Hotlines via e-mail (etik@zorlu.com);
- or via telephone (0212 456 23 23) or (0850 226 23 23) at all hours.

Absolute discretion of employees/persons reporting the violation is essential within the scope of legal/statutory and administrative requirements.

An Ethical Committee established by the Board of Directors is authorised and responsible for evaluating and resolving any complaint, report and allegation submitted to Ethical Principles Hotlines. In this context, Zorlu Holding Audit Group assesses the reported case. The Internal Audit Review Department under Zorlu Holding Audit Group carries out all necessary examinations, inspections or investigations about the complaints, allegations or reports submitted to the Violation Hotlines.

Should the need arise, Policy shall be revised. It can be updated on condition that Zorlu Holding Human Resources Group, Legal Group, Audit Group and Corporate Communications and Sustainability Department are consulted.