

Otokoç Otomotiv

HUMAN RIGHTS POLICY



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1. PURPOSE AND SCOPE

This Human Rights Policy (“**the Policy**”) is a guide that reflects Otokoç Otomotiv’s approach and standards with respect to human rights and demonstrates the importance that Otokoç Otomotiv attaches to respect for human rights.

All employees, directors and officers of Otokoç Otomotiv shall comply with this Policy. Otokoç Otomotiv also expects and takes the necessary steps to ensure that all of its Business Partners - to the extent applicable - comply with and/or act accordance with this Policy.

2. DEFINITIONS

“**The UN**” means the United Nations.

“**The UN Guiding Principles on Business and Human Rights**”¹ is a set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations.

“**The UN Global Compact**”² is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption.

“**Worst Forms of Child Labour Convention (Convention No. 182)**”³ means the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour.

“**The ILO**” means The International Labor Organization

“**The ILO Declaration on Fundamental Principles and Rights at Work**”⁴ is a ILO declaration adopted that commits all member states whether or not they have ratified the relevant Conventions, to respect, and promote the following four categories of principles and rights in good faith:

- Freedom of association and effective recognition of collective bargaining,
- Elimination of all forms of forced or compulsory labor,
- Abolition of child labor,
- Elimination of discrimination in employment and occupation

“**Human rights**” are rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, difference of thought, national or social origin, and wealth. This includes the right to an equal, free and dignified life, among other human rights.

¹ https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

² <https://www.unglobalcompact.org/what-is-gc/mission/principles>

³ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

⁴ <https://www.ilo.org/declaration/lang--en/index.htm>

“The Universal Declaration of Human Rights (UDHR)”⁵ is a milestone document in the history of human rights, drafted by representatives with different legal and cultural backgrounds from all regions of the world, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected.

“Business Partner” includes suppliers, distributors, dealers, licensed dealers, authorized services and other third parties with whom the company has a business relationship and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company, as well as their employees, representatives, execution assistants or deputies.

“The Women’s Empowerment Principles”⁶ (WEPs) a set of Principles offering guidance to business on how to promote gender equality and women’s empowerment in the workplace, marketplace and community. Established by UN Global Compact and UN Women, the WEPs are informed by international labor and human rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women’s empowerment.

“Koç Group” means Koç Holding A.Ş., companies which are controlled directly or indirectly, jointly or individually by Koç Holding A.Ş. and the joint venture companies listed in its latest consolidated financial report.

“Otokoç Otomotiv” means all of the companies directly or indirectly, individually or jointly controlled by Otokoç Otomotiv and its business partnerships (*Joint Ventures*) included in its latest consolidated financial report.

“The OECD” means The Organization for Economic Co-operation and Development

“The OECD Guidelines for Multinational Enterprises”⁷ aims to develop a state-sponsored corporate responsibility behavior that will maintain the balance between competitors in the international market, and thus, increase the contribution of multinational companies to sustainable development.

3. GENERAL PRINCIPLES

As a global group, Otokoç Otomotiv is guided by the Universal Declaration of Human Rights (UDHR), and maintains a respectful understanding of Human Rights for its stakeholders in the countries where it operates. Creating and maintaining a positive and professional working environment for its employees is the main principle of Otokoç Otomotiv. Otokoç Otomotiv acts in accordance with global ethical principles in areas such as recruitment, promotion, career development, wage, fringe benefits, and diversity and respects the rights of its employees to form

⁵ <https://www.un.org/en/universal-declaration-human-rights/>

⁶ <https://www.weps.org/about>

⁷ <http://mneguidelines.oecd.org/annualreportsontheguidelines.htm>

and join organizations of their own choice. Forced and child labor as well as all forms of discrimination and harassment are expressly prohibited.

Otokoç Otomotiv primarily adheres to following international human rights standards and principles:

- The ILO Declaration on Fundamental Principles and Rights at Work (1998),
- The OECD Guidelines for Multinational Enterprises (2011),
- The UN Global Compact (2000),
- The UN Guiding Principles on Business and Human Rights (2011),
- The Women's Empowerment Principles (2011).
- Worst Forms of Child Labour Convention (Convention No. 182), (1999)

4. COMMITMENTS

Otokoç Otomotiv respects the rights of its employees, directors, officers, shareholders, Business Partners, customers, and any other individuals affected by its operations, products or services by complying the principles of the Universal Declaration of Human Rights (UDHR) and the ILO Declaration on Fundamental Principles and Rights at Work.

Otokoç Otomotiv is committed to treating all employees honestly and fairly, and providing a safe and healthy working environment that respects human dignity while avoiding discrimination.

Otokoç Otomotiv may also apply additional standards that take into account vulnerable and disadvantaged groups that are more susceptible to negative Human Rights impacts and require special attention. Otokoç Otomotiv takes into account the specific circumstances of groups whose rights are further elaborated in United Nations instruments: indigenous peoples; women; ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families, as referred to in the UN Guiding Principles on Business and Human Rights.

Diversity and Equal Recruitment Opportunities

Otokoç Otomotiv is committed to employ people from diverse cultures, professional experiences and backgrounds. Recruitment decisions are based on job requirements and personal qualifications regardless of race, religion, nationality, gender, age, marital status or disability.

Non-Discrimination

Zero-tolerance towards discrimination is the key principle in the entire employment process, including promotion, assignment and training. Otokoç Otomotiv expects all its employees to show the same sensitivity in their behavior towards each other.

Otokoç Otomotiv strives to treat its employees equally by providing equal rights and opportunities. All forms of discrimination and disrespect based on race, gender, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition or political opinion are unacceptable.

Zero Tolerance to Child Labor and Forced Labor

Otokoç Otomotiv strongly opposes child labor, which causes children's physical and psychological harm to children, and interferes with their right to education. In addition, Otokoç Otomotiv opposes all forms of forced labor, which is defined as work that is performed involuntarily and under the threat of any penalty.

In accordance with the conventions and recommendations of the ILO, the Universal Declaration of Human Rights, and the UN Global Compact, Otokoç Otomotiv has a zero-tolerance policy towards slavery and human trafficking and expects all its Business Partners to act accordingly.

Freedom of Association and Collective Bargaining

Otokoç Otomotiv respects the right and freedom of choice of its employees to join a trade union, and to bargain collectively without any fear of retaliation. Otokoç Otomotiv is committed to a constructive dialogue with the freely chosen representatives of its employees, represented by a legally recognized trade union.

Health and Safety

Protecting the health and safety of employees, and other persons who are, present in a work area for any reason is one of the main concerns of Otokoç Otomotiv. Otokoç Otomotiv provides a safe and healthy working environment. Koç Group companies takes the necessary safety measures in the work place in a manner that respects the dignity, privacy, and reputation of each individual. Otokoç Otomotiv complies with all relevant regulations and implements all necessary safety measures in all its work areas.

If any unsafe conditions or unsafe behavior are detected in the work areas, Otokoç Otomotiv shall immediately take the necessary measures to ensure the health, safety, and security of their customers and employees.

Zero Tolerance to Harassment and Violence

A key aspect of protecting the personal dignity of employees is ensuring that harassment or violence does not occur or, if it does occur, sanctioned adequately. Otokoç Otomotiv is committed to providing a workplace free from violence, harassment, and other unsafe or disturbing conditions. As such, Otokoç Otomotiv does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats.

Working Hours and Remuneration

Otokoç Otomotiv respects the legal working hours in accordance with the local regulations of the countries in which it operates. It is important for employees to have regular breaks, vacations, and effective work-life balance.

Wages are determined in a competitive manner according to the relevant sectors and the local labor market, and where applicable, in accordance with the terms of collective bargaining agreements, if applicable. All compensation, including social benefits, are paid in accordance with the applicable laws and regulations.

Employees may request further information on the laws and regulations that governing working conditions in their own countries from the Legal and Compliance Department.

Personal Development

Otokoç Otomotiv provides its employees with opportunities to develop their talent and potential, and to enhance their skills. Considering human capital as a valuable resource, Otokoç Otomotiv strives for the comprehensive personal development of its employees by supporting them with internal and external trainings.

Data Privacy

In order to protect the personal data of its employees, Otokoç Otomotiv maintains high data protection standards. The data protection standards are implemented in accordance with related legislations.

Otokoç Otomotiv expects the employees to comply with data privacy laws in each of the countries it operates.

Political Activities

Otokoç Otomotiv respects the legal and voluntary political participation of its employees. However, employees should carry out their political activities outside of working hours and should avoid using Otokoç Otomotiv resources for these activities.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Otokoç Otomotiv are responsible for complying with this Policy, implementing and supporting the relevant Otokoç Otomotiv's procedures and controls in accordance with the requirements of this Policy. Otokoç Otomotiv also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable comply with and/or act in accordance with this Policy.

If there is a discrepancy between the local regulations, applicable in the countries where Otokoç Otomotiv operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations.

If you become aware of any action that you believe is inconsistent with this Policy, the applicable law or the Koç Group and Otokoç Otomotiv Code of Ethics, you may seek guidance or report the incident to your line manager. Alternatively, you may report the incident to Ethics Hotline via the following link: "koc.com.tr/hotline"

Otokoç Otomotiv employees may contact the Human Resources Directorate of Otokoç Otomotiv for their questions regarding this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

6. REVISION HISTORY

This Policy takes effect on 29.11.2021 as of the date approved by the Board of Directors and will be maintained by the Human Resources Directorate.

Revision	Date	Comment
No:1	10.01.2024	Definitions, expressions and explanations are improved.