

BORUSAN GROUP HUMAN RIGHTS POLICY



PURPOSE

Borusan Holding recognizes respect for human rights as a fundamental corporate responsibility that is embraced at the highest level across the Group. The Borusan Group Human Rights Policy sets out Borusan Holding's and its Group Companies' commitment to fostering a people-centered, ethical, inclusive, safe, and fair working environment. Respect for human rights is embedded as an integral component of strategic decision-making processes. In this context, Borusan prioritizes the well-being of its employees and the safety of all individuals throughout its value chain, promotes the principle of equality, upholds human dignity, and safeguards fundamental rights and freedoms. Guided by its strong culture of ethics and integrity, Borusan regards the provision of a fair, respectful, and responsible working environment for all employees and stakeholders as a core corporate responsibility.

Accordingly, this Policy seeks to:

- Embed respect for human rights across all aspects of our business activities and decision-making processes;
- Prevent actual and potential human rights impacts and ensure ethical, safe, and healthy working conditions;
- Foster inclusive and decent workplaces that value diversity and uphold human dignity;
- Advance responsible business practices throughout all operations and processes, including those related to digitalization, productivity, and sustainability;
- Promote a governance approach aligned with internationally recognized human rights standards and leading practices;
- Encourage and support the advancement of these principles for all individuals throughout the value chain.

SCOPE

This Policy applies to Borusan Holding and all Group Companies and is binding on members of the Board of Directors, executives, and all employees across the Borusan Group. It serves as a high-level framework establishing the minimum standards, expectations, and compliance requirements that all Group companies are required to uphold.

The Policy is implemented throughout Borusan Holding and all affiliated Group Companies. To foster a culture of respect for human rights across the Borusan ecosystem, business partners, suppliers, and contractors are also expected to act in accordance with the principles set forth in this Policy. Where necessary, supportive and enabling mechanisms, including risk-based assessment, audit, and monitoring processes, are implemented to promote and verify such alignment.

Together with the Orange Guide, the Borusan Group Sustainability Policy, the Diversity, Equity and Inclusion Guide, the Borusan Group Sustainable Procurement Policy, and other corporate principles and practices of Borusan, this Policy forms part of an integrated governance framework.



Each Group Company is responsible for developing, implementing, and maintaining its own governance structures, policies, and operational practices to ensure compliance with the requirements set forth in this Policy. All Group Companies and affiliates regard compliance with applicable local laws, regulations, and industry standards in the jurisdictions in which they operate as a minimum requirement.

This Policy has been developed and enacted with due consideration of applicable legislation and relevant industry standards. Borusan closely monitors developments in the legal and regulatory frameworks of the countries in which it operates and ensures that this Policy is periodically reviewed and updated, as necessary, to reflect evolving requirements and emerging best practices.

In exceptional circumstances where applicable legal requirements and the principles and standards set out in this Policy are not fully aligned, Group Companies shall comply with applicable laws while also seeking to develop complementary and supportive measures aimed at preventing or mitigating adverse human rights impacts, guided by the protection of human dignity and the best interests of affected individuals.

In implementing this Policy, Group Companies may adopt additional policies, procedures, or implementation principles, taking into account Board decisions, applicable legal requirements, sector-specific considerations, and other relevant circumstances, provided that such measures remain consistent with this Policy. Any such arrangements shall be communicated to the Borusan Holding Ethics and Compliance Committee for review and assessment.

DEFINITIONS

“Algorithmic Discrimination” means situations in which artificial intelligence, automated, or data-driven systems generate directly or indirectly discriminatory outcomes for certain individuals or groups as a result of the datasets used, model design, assumptions, or methods of implementation.

“United Nations (UN)” means the United Nations international organization.

“United Nations Global Compact (UNGC)” means the universal framework setting out ten fundamental principles for businesses in the areas of human rights, labour standards, environment, and anti-corruption.

“United Nations Guiding Principles on Business and Human Rights (UNGPs)” means the internationally recognized authoritative framework that sets out States' duty to protect human rights, the corporate responsibility to respect human rights, and access to effective remedy for adverse human rights impacts. The UNGPs provide guiding principles for companies to systematically identify, prevent, mitigate, monitor, and address human rights risks and impacts arising from their operations and business relationships.



“Borusan Holding” means Borusan Holding Joint Stock Company.

“Employee Monitoring” means the monitoring of employees through digital tools, cameras, location data, access records, software applications, or other methods, and/or the analysis of data generated through such monitoring activities for operational, security, productivity, compliance, or similar purposes.

“Conflict-Affected and High-Risk Areas (CAHRAs)” means areas characterized by armed conflict, widespread violence, weak governance, systematic human rights violations, or limited rule of law.

“Conflict Minerals (3TG)” means tin, tantalum, tungsten, and gold that, when extracted, processed, or traded in conflict-affected and high-risk areas, may contribute to human rights abuses or the financing of armed groups.

“Value Chain” means the full range of activities connected to Borusan's operations, extending from the design and sourcing of products and services through production and operational processes, distribution, after-sales services, and end-of-life management, including both upstream and downstream business relationships.

“Directly Linked” means situations where Borusan has neither caused nor contributed to an adverse human rights impact, but the impact is nevertheless linked to its operations, products, or services through a business relationship, such as with a supplier, contractor, distributor, customer, or other business partner.

“Group Companies” means Borusan Holding and all of its subsidiaries, joint ventures, and affiliates.

“Rights-holders” means individuals and/or groups who are directly or indirectly affected, or may potentially be affected, by Borusan's operations, business relationships, or value chain.

“Human Rights” means the inherent rights and freedoms of all human beings, without distinction of any kind, including but not limited to gender, generation, language, religion, race, ethnicity, colour, creed, disability, philosophical or political opinion, economic status, gender identity, or sexual orientation, and encompasses the right to live in dignity, freedom, and equality.

“Human Rights Due Diligence” means the ongoing, systematic, and risk-based process through which Borusan identifies actual and potential adverse human rights impacts arising from its operations, Group Companies, and business relationships; seeks to prevent or mitigate such impacts; tracks the effectiveness of measures taken; implements improvements where necessary; and communicates relevant information through reporting and transparency processes.



“Respect for Human Rights” means Borusan’s commitment to avoiding infringement of human rights through its own activities and business relationships and to exercising due diligence to prevent, mitigate, and, where necessary, address adverse impacts.

“Decent Work” means the right of workers to perform work under conditions that are free, fair, safe, and consistent with human dignity, including access to fair wages, social protection, freedom of association, and a workplace free from discrimination.

“Business Partners” means suppliers, subcontractors, distributors, dealers, authorized service providers, agents acting on behalf of the company, contractors, consultants, and their respective employees and representatives.

“Women’s Empowerment Principles (WEPs)” means the principles established by the United Nations Global Compact and UN Women that provide guidance to businesses on advancing gender equality and women’s empowerment in the workplace, marketplace, and community.

“Contribute” means situations where Borusan’s activities, decisions, or business practices materially contribute to the occurrence or worsening of an adverse human rights impact caused by another party.

“Vulnerable Groups” means individuals or groups who may face a heightened risk of discrimination, exclusion, exploitation, or harm and who may require additional protection or support, including persons with disabilities, young workers, subcontractor employees, temporary workers, migrant workers, and vulnerable groups within local communities.

“Privacy” means the protection of individuals’ legitimate expectations regarding the collection, use, sharing, and retention of information relating to their private lives, personal sphere, and personal data, including the prevention of unnecessary interference and respect for private life.

“Retaliation” means any adverse treatment, including dismissal, reduction in pay or responsibilities, exclusion, coercion, threats, harassment, obstruction of career opportunities, or similar actions, taken against an individual for reporting or raising concerns regarding a suspected human rights violation, filing a grievance, participating in an investigation, or making a report in good faith.

“Likelihood” means the probability that a specific adverse human rights impact may occur.

“Adverse Human Rights Impact / Human Rights Violation” means any action, omission, practice, or circumstance arising in connection with Borusan’s operations or business relationships that impairs, restricts, undermines, or harms a rights-holder’s enjoyment of human rights and/or results in outcomes inconsistent with human dignity.

“Automated Decision-Making” means digital decision-making processes that produce legal or similarly significant effects on individuals without human involvement or with only limited human oversight.

“Proportionality” means the principle that a measure, practice, or intervention used to achieve a legitimate objective must be appropriate, necessary, and proportionate, and must not impose unnecessary or excessive adverse impacts on rights-holders when balanced against the intended objective.

“Salient Human Rights Risk” means a risk that has the potential to result in severe adverse human rights impacts, significant likelihood, and/or impacts that are difficult to remediate.

“Special Categories of Personal Data” means personal data revealing racial or ethnic origin, political opinions, philosophical beliefs, religion, religious denomination or other beliefs, appearance and dress, membership of associations, foundations, or trade unions, health information, sexual life, criminal convictions and security measures, as well as biometric and genetic data.

“Stakeholders” means employees, customers, shareholders, investors, subcontractors, suppliers, business partners, local communities, civil society organizations, trade unions, and all other parties who are affected, or may potentially be affected, by our activities.

“Cause” means situations where Borusan’s own activities or decisions directly result in an adverse human rights impact.

“Severity” means the scale, scope, and irremediable character of an adverse human rights impact.

“Grievance Mechanism / Reporting Channels” means the processes and channels through which employees, business partners, suppliers, contractors, local communities, and other stakeholders may safely, confidentially, and, where appropriate, anonymously raise concerns regarding actual or potential human rights violations, and through which such concerns are addressed in a timely, impartial, and diligent manner.

“Privacy by Design” means the integration and protection of privacy and personal data considerations from the design stage of systems, processes, products, services, and technologies.

“Remedy” means outcome-oriented measures aimed at addressing adverse human rights impacts caused or contributed to by Borusan, including, where appropriate, cessation of harm, restoration, compensation, rehabilitation, apologies, disciplinary measures, structural improvements to prevent recurrence, and other suitable corrective actions.

“Remediability” means the extent to which an adverse impact can be effectively remedied from the perspective of the affected rights-holder.

“International Labour Organization (ILO)” means the United Nations specialized agency responsible for establishing international labour standards.

“ILO Declaration on Fundamental Principles and Rights at Work” means the ILO declaration adopted in 1998, which sets out fundamental principles including freedom of association, the elimination of forced labour, the abolition of child labour, and the elimination of discrimination in employment and occupation.

“Data Minimisation” means the principle that personal data shall be processed only to the extent necessary for specified and legitimate purposes and shall be adequate, relevant, and limited to what is necessary in relation to those purposes.

HUMAN RIGHTS APPROACH AND COMMITMENTS

Borusan Group became a signatory to the United Nations Global Compact (UNGC) in 2006. Throughout its operations, the Group is committed to taking the necessary measures to advance the ten principles of the UNGC relating to human rights, labour, environment, and anti-corruption. In addition, the Group is committed to aligning its practices with the following internationally recognized principles and frameworks:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

Borusan also recognizes the specific vulnerabilities and circumstances of vulnerable groups and seeks to strengthen practices aimed at protecting and promoting their human rights.

Borusan Group considers the impacts of its activities on public health, safety, and the rights of local communities. It respects the rights of local communities, land and land-use rights, and the protection of cultural heritage, and seeks to avoid and minimize adverse impacts associated with land acquisition and land use wherever possible. Borusan does not engage in practices that may result in forced displacement or involuntary resettlement. Where such impacts cannot be avoided, Borusan seeks to ensure fair and timely compensation and the protection of livelihoods in accordance with applicable legal requirements.

Assessments conducted under this Policy also take into account the direct and indirect human rights impacts arising from environmental issues, including but not limited to climate change-related extreme weather events, restrictions on access to and use of land, land degradation, adverse impacts on livelihoods, impacts on access to a clean, healthy and sustainable environment, water availability and quality, air and soil pollution, and biodiversity loss. Such impacts are assessed in connection with internationally recognized human rights, including the rights to life, health, safe working conditions, and an adequate standard of living. In addition, the human rights implications of climate change and the energy transition, including just transition considerations, reskilling, and impacts on workers and local communities, are taken into account.



Borusan Group incorporates environmental, social, and governance (ESG) considerations into investment and business partnership decisions and regards the potential impacts on human rights and society as an integral part of its investment decision-making processes.

Borusan recognizes the potential human rights impacts associated with the use of emerging technologies, including digitalization, automation, and artificial intelligence, as an integral component of its human rights approach. These impacts may include algorithmic discrimination, automated decision-making, manipulation of individual decision-making, employee monitoring, privacy-related risks, and risks to freedom of expression. Borusan is committed to managing such risks through a preventive and risk-based approach.

Accordingly, Borusan adopts a Privacy by Design and Privacy by Default approach in the development and use of emerging technologies, ensuring that privacy considerations are embedded throughout the technology lifecycle. Borusan implements appropriate controls in line with applicable legal requirements and internationally recognized principles relating to the processing of personal data, including purpose limitation, proportionality, data minimisation, traceability, human oversight and accountability, mitigation of bias and discrimination risks, transparency, explainability, and accessible feedback mechanisms. Borusan is committed to the continuous improvement of these practices.

Regular bias and discrimination assessments are conducted for artificial intelligence and automated decision-making systems, and the outcomes of such assessments are monitored by the relevant functions.

Non-Discrimination and Equal Opportunity

Recognizing and eliminating discrimination is not only a policy commitment but a cornerstone of Borusan's corporate culture.

Borusan Holding and its Group Companies are committed to providing all employees, including subcontractor employees, with a safe, respectful, and fair working environment. Discrimination of any kind based on race, colour, sex, age, religion, language, ethnicity, disability, pregnancy, maternity, paternity or caregiving responsibilities, marital status, sexual orientation, gender identity or expression, political opinion, cultural background, or any other personal characteristic will not be tolerated under any circumstances. All forms of discrimination, harassment, bullying, and exclusionary conduct are strictly prohibited.

To prevent discrimination and promote equal opportunity, Borusan:

- Ensures that recruitment, promotion, compensation, development, and training decisions are based solely on merit, qualifications, potential, and performance. All critical human resources processes are conducted through structured, measurable, and objective criteria.



- Implements training, awareness-raising initiatives, and data-driven decision-making mechanisms to reduce both conscious and unconscious bias. Diversity within decision-making bodies is promoted to minimize the risk of bias and improve the quality and fairness of decisions.
- Takes appropriate measures to ensure that algorithmic or data-driven tools used in recruitment, promotion, performance evaluation, compensation, and similar decision-making processes do not result in direct or indirect discrimination. The potential for such systems to generate bias is assessed from a human rights perspective.
- Adopts an equal opportunity approach in areas including disability inclusion, gender equality, age diversity, and neurodiversity, and implements inclusive practices that recognize and accommodate different needs.
- Promotes inclusive communication, psychological safety, and a culture of respect to ensure that employees feel safe, valued, and a sense of belonging.
- Applies fair and transparent remuneration practices in line with the principle of equal pay for work of equal value.
- Where appropriate, adopts temporary special measures aimed at addressing structural barriers and overcoming entrenched biases in order to advance equal opportunity.

Borusan Group recognizes the protection of the human rights of migrant workers and workers employed under temporary arrangements as a fundamental responsibility. Borusan is committed to ensuring that such workers are not subjected to discrimination based on nationality, migration status, or employment arrangement with respect to remuneration, working hours, occupational health and safety, access to social benefits, or disciplinary processes.

Diversity, Equality and Inclusion

In line with the Borusan Group Diversity, Equity and Inclusion (DEI) approach, Borusan is committed to fostering a workplace where all employees, including subcontractor employees, are respected, valued for their unique differences, and empowered to realize their full potential.

Borusan Holding and its Group Companies regard diversity, equity, and inclusion as fundamental elements of their corporate culture. Borusan believes that a workplace enriched by diverse identities, experiences, and perspectives enhances innovation, employee engagement, and organizational performance. Accordingly, Borusan seeks to create an environment where differences are valued, individuals can be their authentic selves, and equal opportunities are accessible to all.



At Borusan, diversity encompasses a broad range of characteristics, including age, gender, ethnicity, disability, cultural background, education, beliefs, and lifestyle. Borusan recognizes that diversity can only thrive through an equitable approach supported by practices that remove disadvantages and promote equal opportunities.

For Borusan, equity extends beyond providing equal opportunities. It also involves developing fair practices that take into account differing needs and circumstances while addressing structural barriers that may hinder participation and advancement.

Inclusion, for Borusan, means creating and sustaining a workplace where all employees, including subcontractor employees, are accepted and respected for their unique identities, where differences can be expressed openly and safely, ideas can be shared freely, and every individual feels valued and respected.

Borusan Group recognizes the presence of both conscious and unconscious biases in working life. Accordingly, recruitment, performance evaluation, and promotion processes are designed and conducted based on objective criteria. Borusan Holding and its Group Companies implement practices aimed at preventing discrimination, reducing bias, and promoting inclusive language and behaviours.

Particular attention is given to advancing accessibility and inclusion in priority areas such as disability inclusion and accessibility, gender equality, age and generational diversity, and neurodiversity. Borusan seeks to enhance both physical and digital accessibility, support meaningful participation across generations, foster neuroinclusive workplaces, and integrate gender equality considerations into all relevant processes and practices.

Borusan continuously improves all aspects of the employee experience in line with DEI principles, from recruitment and career development to flexible working arrangements and family-friendly policies. Borusan is committed to providing a workplace that is safe, fair, accessible, and responsive to diverse needs, while strengthening an inclusive culture in which the voices of all employees, including subcontractor employees, are heard and valued.

Borusan seeks to extend its DEI approach beyond its own operations and throughout its value chain. The Group collaborates with suppliers, business partners, customers, and communities to promote diversity, equity, and inclusion and to support initiatives that create broader social value.

At Borusan, Diversity, Equity and Inclusion is not viewed as a static policy area but as an ongoing transformation journey that requires the active participation of all employees. Building and sustaining an inclusive workplace where everyone has access to equal opportunities and feels a sense of belonging and value is regarded as a core corporate commitment.



Zero Tolerance for Child Labour and Forced Labour

Throughout its operations and across all stages of its supply chain and business relationships, Borusan Group maintains a zero-tolerance approach to modern slavery, forced labour, child labour, and human trafficking in line with ILO conventions and recommendations, the Universal Declaration of Human Rights, and the principles of the United Nations Global Compact. Borusan expects all business partners to adhere to the same standards and principles.

No employee of Borusan Group shall be subjected to forced, compulsory, involuntary, or coercive labour under any circumstances. Practices such as debt bondage, restrictions on freedom of movement, retention of identity documents, or any other form of coercion are strictly prohibited. Borusan Group does not engage with business partners that are involved in, or benefit from, any form of forced labour.

Child labour is strictly prohibited throughout Borusan Group's operations and business relationships. Borusan complies with the minimum working age requirements established under applicable laws and regulations and ensures that individuals below the legally permitted working age are not employed in hazardous work or in any activities prohibited by law. Borusan does not conduct business with suppliers or business partners that employ or otherwise exploit child labour.

Zero Tolerance for Harassment and Violence

At Borusan, every employee has the right to feel safe, respected, and protected in the workplace. Borusan Group adopts a zero-tolerance approach to all forms of verbal, physical, sexual, psychological, and emotional harassment and mobbing in the workplace. To prevent harassment and violence, Borusan implements regular training programmes, awareness-raising initiatives, and leadership development programmes aimed at fostering a respectful and inclusive workplace culture.

Reports of harassment and/or violence are addressed through the channels defined in the Orange Guide, in accordance with principles of confidentiality and protection against retaliation. The relevant processes are aligned with the grievance and remedy mechanisms described in Section 7 of this Policy. All reports are assessed promptly, impartially, and with due care. Where appropriate, disciplinary measures are taken, and support is provided to affected individuals.

Freedom of Association and Collective Bargaining

Borusan Group respects employees' rights to form and join trade unions of their choice and to engage in collective bargaining, in accordance with applicable laws and regulations.

Borusan values open, constructive, and ongoing social dialogue with trade unions and employee representatives freely chosen by employees. Transparent communication and mutual respect are promoted throughout consultation and decision-making processes. Where collective bargaining agreements are in place, Borusan is committed to fulfilling its obligations in accordance with the applicable agreements and legal requirements.

In jurisdictions where freedom of association or trade union activity is restricted, Borusan seeks to support alternative mechanisms that enable employee representation, participation, and dialogue, consistent with internationally recognized human rights and labour standards.

Borusan is committed to ensuring that trade union membership or participation in lawful trade union activities does not result in any form of adverse treatment for employees. Discriminatory practices related to trade union membership or activities are not tolerated. Borusan seeks to maintain a working environment in which employees can exercise these rights freely and without fear of intimidation, retaliation, discrimination, or other forms of adverse consequences.

OCCUPATIONAL HEALTH AND SAFETY

The health and safety of employees and all individuals present within Borusan Holding and Group Company workplaces is a top priority. To provide a healthy and safe working environment, all manufacturing, operational, and workplace activities are conducted in compliance with applicable legal requirements and internationally recognized occupational health and safety standards. Borusan Group regards the protection of human life, health, and well-being as a fundamental value and is committed to implementing robust and sustainable measures to prevent workplace incidents and injuries, guided by its ambition of achieving zero accidents.

Borusan Group Companies record and report all occupational incidents and accidents, regardless of severity, conduct root cause analyses, and implement corrective and preventive actions to prevent recurrence. Work-related health risks are regularly assessed, and occupational health surveillance programmes are implemented with the aim of preventing occupational illnesses and promoting employee well-being.

All Borusan Group employees are expected to contribute to and uphold a strong health and safety culture. Borusan also expects its suppliers, contractors, and business partners to operate in accordance with the same principles. The Group is committed to providing the support, resources, and guidance necessary to sustain and continuously strengthen its health and safety culture.

Occupational health and safety performance is continuously improved through risk assessments, preventive measures, health and safety training, the provision and use of personal protective equipment, emergency preparedness, and effective response procedures. In addition, Borusan seeks to support the overall well-being of its employees through initiatives focused on ergonomics, psychological health, and employee well-being.



Security Services

Borusan Group is committed to ensuring that workplace security services are provided in a manner that respects human dignity and internationally recognized human rights. Where security personnel are required at Borusan Group facilities and/or project sites, security services are carried out in a manner that is respectful of human rights, proportionate, and limited to what is necessary under the circumstances. The selection, training, and responsibilities of security personnel are designed to ensure that any use of force is exercised only as a last resort and in accordance with the principle of proportionality, to prevent all forms of ill-treatment and human rights abuses, and to ensure respectful treatment of employees, contractors, local communities, and other stakeholders. Any concerns or grievances related to security services are addressed through the grievance and remedy mechanisms described in Section 7 of this Policy.

Fair Wages and Working Hours

Borusan Group respects employees' rights to social security and is committed to ensuring that all employees are employed in compliance with applicable social security and employment legislation. Compliance with applicable legal requirements and relevant labour standards is maintained with respect to remuneration, benefits, working hours, leave entitlements, and social security practices.

Borusan Group recognizes access to fair remuneration, transparent assessment processes, and healthy working conditions as a fundamental principle of its commitment to respecting human rights for all employees, including subcontractor employees. Compensation and reward practices are implemented in line with Borusan's Recognition, Appreciation and Total Rewards Management strategy. Remuneration decisions take into account the nature of the role, level of responsibility, required competencies, prevailing market conditions, and the Company's financial capacity. Borusan seeks to maintain an inclusive and performance-oriented remuneration framework that recognizes contribution and supports high performance.

Where collective bargaining agreements are in place, Borusan fully complies with the applicable provisions and ensures that wages are paid regularly, in full, and on time. Fairness, equity, and transparency constitute the guiding principles of all compensation, benefits, and reward practices.

Borusan Group complies with applicable working time regulations in all jurisdictions in which it operates and takes appropriate measures to ensure that maximum working hour limits are not exceeded. Overtime work is performed only within legally permitted limits and is compensated through additional pay and benefits in accordance with applicable legal requirements. Through regular rest periods, leave entitlements, and appropriate working arrangements, Borusan seeks to support employees' work-life balance. Flexible working arrangements, where appropriate to the nature of the work, are encouraged to support employees' well-being and quality of life.

Borusan is a signatory to the United Nations Women's Empowerment Principles (WEPs). Accordingly, Borusan maintains a zero-tolerance approach to gender-based pay discrimination and discriminatory employment practices. Practices are regularly monitored to support the continued implementation of fair and equitable remuneration principles regardless of gender. Gender pay gap metrics are calculated and reported in accordance with internationally recognized methodologies.



DATA PRIVACY AND SECURITY

Borusan Group recognizes data privacy and security as an integral part of its commitment to respecting human rights and is committed to complying with applicable personal data protection laws and regulations in all jurisdictions in which it operates. Accordingly, Borusan applies high standards to safeguard the confidentiality, integrity, and security of personal data throughout its operations and expects its business partners to demonstrate the same level of commitment.

Borusan respects the privacy of all information relating to identified or identifiable individuals. Personal data is processed solely for legitimate business purposes, in accordance with applicable legal requirements, and subject to appropriate notice and transparency obligations. Employees are required to comply fully with the Company's policies, procedures, and practices governing the processing of personal data and are responsible for ensuring that they are duly authorized to process such data, that data subjects have been appropriately informed, and that processing activities are carried out in accordance with applicable requirements.

Recognizing the heightened sensitivity of Special Categories of Personal Data, Borusan conducts related processing activities within the framework of policies and procedures established in accordance with applicable laws and the requirements prescribed by relevant authorities. Where personal data is transferred to third parties, whether domestically or internationally, such transfers are undertaken only where appropriate technical and organizational safeguards are in place. In cases of uncertainty, employees are expected to seek guidance from the relevant legal or compliance functions. Compliance with the data security measures established by Borusan Group is mandatory for all employees. In the event of a suspected personal data breach, employees are required to promptly notify their managers and, where applicable, the designated Company Contact Person, and to fully comply with the applicable data breach management procedures.

The processing of personal data in connection with artificial intelligence and data analytics applications is conducted in accordance with the principles of lawfulness, fairness, accuracy, data quality, purpose limitation, data minimisation, proportionality, and storage limitation, as required by applicable legislation. Borusan also considers the potential impacts of automated analysis and monitoring practices on employees' privacy and psychological well-being. Furthermore, when using data that does not constitute personal data, Borusan takes into account the potential human rights implications that such applications may have on individuals.



Legal and Ethical Compliance

Borusan Group is committed to conducting all of its activities in compliance with applicable national laws and regulations, internationally recognized human rights standards, and relevant industry requirements.

The Orange Guide, which serves as the cornerstone of Borusan Group's ethics and compliance culture, provides a guiding framework for all employees and forms the basis for assessing non-compliance and implementing disciplinary processes where necessary. Borusan also expects its business partners to understand the principles and standards set out in the Orange Guide and to act in accordance with those principles to the extent applicable to their activities and relationship with the Group.

Borusan recognizes that corruption and bribery are inconsistent with the principles of equal treatment, fairness, and non-discrimination and may increase the risk of adverse impacts on human rights, particularly for vulnerable groups. Accordingly, Borusan maintains a zero-tolerance approach to bribery and corruption. The Group refrains from all forms of unethical conduct, including bribery, facilitation payments, corruption, fraud, abuse of authority, and other improper practices, and supports national and international efforts aimed at preventing and combating such conduct.

Employees are responsible for complying with applicable legal requirements, adhering to ethical standards of conduct, and acting in accordance with the policies, procedures, and standards established by the Company in all activities and decision-making processes. Control mechanisms designed to prevent legal, ethical, and compliance risks are regularly reviewed and updated as necessary.

The Ethics and Compliance Committee oversees Borusan's commitment to ethical principles, standards of conduct, and compliance requirements. The Committee reviews allegations of misconduct, conducts or oversees appropriate investigations, and ensures that necessary corrective actions are taken. Employees, suppliers, business partners, and other stakeholders may raise concerns regarding potential violations of legal obligations, ethical principles, or this Policy through the reporting and grievance channels described in Section 7.

Conflict Minerals and Conflict-Affected and High-Risk Areas (CAHRAs)

Borusan Group seeks to ensure that its activities and supply chain do not contribute to human rights abuses associated with conflict-affected and high-risk areas (CAHRAs). Accordingly, Borusan promotes the responsible sourcing of conflict minerals—tin, tantalum, tungsten, and gold (3TG)—as well as other high-risk minerals and raw materials.

In this regard, Borusan adopts an approach aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and expects its business partners to adhere to equivalent standards and responsible sourcing practices.



Talent Management and Development

Borusan Group is committed to fostering an inclusive and accessible learning culture that supports the continuous development of its employees. Attracting and developing young talent, strengthening cultural alignment, and preparing future leaders through initiatives such as the Alpha Young Talent Programme, internship programmes, and other talent development initiatives constitute an important part of the Group's strategic talent management approach.

At Borusan, career development is supported under the umbrella of Borusan Academy through a culture of continuous learning and development. Through digital learning platforms, personal development tools, leadership programmes, functional and technical training, mentoring initiatives, and other development opportunities, employees are provided with the knowledge, skills, and competencies required to achieve their professional goals and realize their full potential.

Talent Committees, 360-degree competency assessments, and performance management processes are utilized to regularly assess employees' strengths, capabilities, and development areas. Based on these assessments, individual development plans are established to support sustainable career growth and succession planning.

Participation in Political Activities

Borusan Group respects employees' rights to participate in political activities and to engage in political parties, provided that such activities do not represent Borusan, do not involve the use of Company resources, and do not interfere with employees' job responsibilities or performance.

BIn this regard, Borusan Group:

- Does not permit demonstrations, political campaigning, propaganda, or similar political activities within workplace premises;
- Does not allocate Company resources for political purposes and does not permit employees to use Company resources for such activities.

Borusan Group employees and managers shall not discriminate against employees on the basis of their political opinions or participation in lawful political activities. Nor shall they seek to influence, direct, pressure, or otherwise interfere with employees' political views, affiliations, or participation in political activities.

This approach forms part of Borusan Group's commitment to respecting freedom of expression, the principle of non-discrimination, and the fundamental rights and freedoms of its employees.



Supply Chain

In line with the Borusan Sustainable Procurement Policy, Borusan Group maintains a zero-tolerance approach to forced labour, child labour, the financing of terrorism and weapons of mass destruction, unethical extraction practices, and working conditions that are inconsistent with the principles of decent work throughout its supply chain. Where risks are identified in these areas, appropriate preventive, corrective, and remedial actions are implemented. Human rights requirements are incorporated into contractual arrangements with suppliers and subcontractors. Risk-based supplier self-assessments, audits, and, where appropriate, on-site assessments are conducted to identify, prevent, and mitigate adverse human rights impacts. Where identified risks cannot be adequately addressed, the continuation of the business relationship may be reviewed. Borusan expects its business partners to promptly report any actual or potential severe human rights violations arising within their own operations or direct supply chains that are connected to activities carried out on behalf of, or in relation to, Borusan Group.

Stakeholder Engagement

Borusan Group is committed to maintaining regular, transparent, and inclusive dialogue with stakeholders who may be affected by its activities, operations, or business relationships. Stakeholder engagement processes are designed and implemented in a manner that promotes accessibility, inclusiveness, appropriate communication methods, timely engagement, and fair representation, particularly for vulnerable groups and rights-holders. Borusan seeks to ensure that the diverse needs, perspectives, and sensitivities of affected stakeholders are appropriately considered throughout engagement activities. Borusan aims to ensure that stakeholder views, concerns, and feedback are meaningfully considered and, where appropriate, reflected in relevant assessment, decision-making, and continuous improvement processes.

HUMAN RIGHTS DUE DILIGENCE PROCESS

To implement its human rights commitments, Borusan Group operates a Human Rights Due Diligence (HRDD) process aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the EU Corporate Sustainability Due Diligence Directive (CSDDD). This process covers Borusan's own operations, Group Companies, and business relationships that are linked to its operations, products, or services and that fall within its reasonable sphere of influence. The HRDD process is designed to identify, assess, prevent, mitigate, monitor, and address actual and potential adverse human rights impacts arising from Borusan's activities and business relationships.

IDENTIFICATION AND ASSESSMENT OF RISKS

Borusan Group seeks to regularly identify and assess actual and potential adverse human rights impacts arising from its own operations, Group Companies, and business relationships.

Human rights risk assessments take into account factors such as the severity of the risk, the scope of impact, the sector of operation, geographic context, and supply chain characteristics. Priority areas include risks related to child labour, forced labour, discrimination, occupational health and safety, fair wages and working hours, freedom of association, data privacy, and environment-related human rights impacts. In this context, environmental risks are assessed not solely as environmental impacts, but through the lens of their potential adverse impacts on rights-holders. Human rights risk assessments also consider risks arising from digitalization, automation, and artificial intelligence, including algorithmic discrimination, automated decision-making, and employee monitoring systems. Enhanced human rights assessments may be conducted for Group Companies operating in high-risk countries or conflict-affected and high-risk areas (CAHRAs).

Risks are prioritized based on their severity, likelihood, and remediability. Relevant functions within Group Companies assess risks associated with their operations and affected stakeholders and report the results to Borusan Holding. The Boards of Directors of Group Companies oversee the effective implementation of this process and the timely execution of necessary actions.



Prevention, Mitigation and Corrective Actions

Where actual or potential adverse human rights impacts are identified, Borusan Group seeks to prevent or mitigate impacts arising from its own operations. Where human rights risks linked to business partners are identified, Borusan promotes corrective and preventive measures through dialogue, capacity-building, resource allocation, action plans, and similar mechanisms, taking into consideration factors such as the severity, likelihood, and remediability of the risk. Where necessary, Borusan may strengthen contractual requirements, review business relationships, and implement graduated measures up to and including disengagement where risks cannot be adequately addressed. Borusan ensures that appropriate actions are taken without undue delay to prevent identified human rights risks, including occupational health and safety risks. Such actions are implemented within clearly defined and reasonable timeframes.

Monitoring, Review and Reporting

Borusan The Human Rights Due Diligence process is reviewed and updated periodically and, where necessary, on an ad hoc basis in response to significant changes in risk exposure, operating context, or business activities. Human rights risk assessments, mitigation measures, and improvement actions are communicated transparently through Borusan Group's sustainability reporting and other relevant corporate reporting mechanisms. Internal Audit, Legal and Compliance, Human Resources, Sustainability, Risk Management, and other relevant functions collaborate to monitor and continuously improve the effectiveness of the Human Rights Due Diligence process.

Grievance Mechanisms and Remedy

Borusan Group provides employees, business partners, and other affected stakeholders with accessible, secure, confidential, and, where appropriate, anonymous channels through which concerns regarding actual or potential human rights impacts may be raised. To the extent feasible and appropriate, these channels are made available in accessible formats and, where relevant, in multiple languages. Employees, subcontractors, suppliers, customers, and other stakeholders may submit concerns through the channels defined in the Orange Guide:

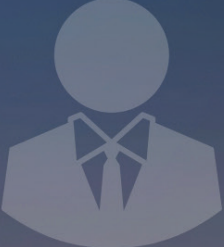
- www.turuncuetik.com
- turuncuetik@borusan.com
- +90 850 281 6393

Borusan seeks to ensure that all reports are addressed in a timely, impartial, and diligent manner. A structured process is maintained covering the receipt, assessment, referral, investigation, resolution, closure, and documentation of reported concerns. Confidentiality, personal data protection, and protection against retaliation are fundamental principles of these processes.



Where Borusan has caused or contributed to an adverse human rights impact, appropriate processes are implemented to provide or enable remedy and corrective action. Where impacts are caused by business partners, Borusan evaluates measures to support or encourage remedy in a manner proportionate to its relationship to the impact and its ability to influence outcomes. Borusan also seeks, where feasible, to take into account the perspectives of affected stakeholders and rights-holders in the identification, assessment, and prioritization of human rights risks and impacts.





ROLES AND RESPONSIBILITIES

The Boards of Directors and Senior Management of each Group Company (including General Managers and Chief Executive Officers, as applicable) are responsible for ensuring the effective implementation, oversight, and enforcement of this Policy within their respective organizations.

Employees are responsible for understanding human rights risks relevant to their areas of responsibility, acting in accordance with this Policy, and reporting concerns through the appropriate channels where necessary. Borusan Group expects all business partners, suppliers, contractors, and other third parties with whom it engages to act in a manner consistent with this Policy and takes appropriate measures to promote such alignment.

The coordination of human rights governance, monitoring, and continuous improvement processes across Borusan Group is led by the Human, Communications and Sustainability Group Presidency of Borusan Holding, in collaboration with other relevant functions. Group Companies are required to designate responsible human rights focal points within their organizations and communicate such appointments to Borusan Holding.

Relevant functions, including Human Resources, Compliance, Internal Audit, Legal, Procurement, Operations, Sustainability, and other applicable functions, are responsible for establishing, implementing, and periodically reviewing the procedures, controls, and practices necessary to support the effective implementation of this Policy within their respective areas of responsibility.

Employees may consult the Ethics and Compliance Committee and/or the Human Resources and/or Sustainability functions regarding any questions related to the implementation of this Policy.

Violations of this Policy by employees may result in disciplinary action, up to and including termination of employment, in accordance with applicable Group policies, procedures, and legal requirements. Where third parties subject to this Policy fail to comply with its requirements, contractual remedies and other appropriate measures may be applied, including, where warranted, the suspension or termination of the relevant business relationship.

Any sanctions or corrective actions arising from violations of this Policy shall be determined and implemented in accordance with applicable Group policies and procedures and the legal requirements of the relevant jurisdiction.



AMENDMENTS

This Policy shall be reviewed at least annually. In light of evolving international standards, regulatory developments, changing global dynamics, and internal Group requirements, the Human, Communications and Sustainability Group Presidency may prepare amendment proposals, as appropriate, in consultation with relevant functions and internal and external stakeholders. All amendments shall be reviewed and approved by the Ethics and Compliance Committee and subsequently submitted to the Chairperson of Borusan Holding Board of Directors for final approval. Approved amendments shall be formally documented and maintained in accordance with applicable document management requirements.

ENTRY INTO FORCE

This Policy shall enter into force upon approval by the Ethics and Compliance Committee and the Chairperson of Borusan Holding Board of Directors.

REFERENCES

Borusan Holding's approach to human rights is guided by the following internationally recognized standards and frameworks:

- Universal Declaration of Human Rights (UDHR, 1948)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- International Covenant on Civil and Political Rights (ICCPR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs, 2011)
- United Nations Global Compact (UNGC, 2000)
- Women's Empowerment Principles (WEPs, 2011)
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Rights of Persons with Disabilities
- ILO Declaration on Fundamental Principles and Rights at Work (1998)
- ILO Fundamental Conventions:
 - Convention No. 87 on Freedom of Association and Protection of the Right to Organise
 - Convention No. 98 on the Right to Organise and Collective Bargaining
 - Convention No. 29 on Forced Labour
 - Convention No. 105 on the Abolition of Forced Labour
 - Convention No. 138 on Minimum Age
 - Convention No. 182 on the Worst Forms of Child Labour
 - Convention No. 100 on Equal Remuneration
 - Convention No. 111 on Discrimination (Employment and Occupation)
- LO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- European Convention on Human Rights



Borusan Holding implements its human rights approach in alignment with the following Group policies and guidance documents:

- Borusan Group Sustainability Policy
- Borusan Group Diversity, Equity and Inclusion Guide
- Borusan Group Diversity, Equity and Inclusion in Recruitment Guide
- Borusan Group Diversity, Equity and Inclusion in Communications Guide
- Borusan Group Gender Equality and Domestic Violence Prevention Policy
- Borusan Group Parent and Family Guide
- Borusan Sustainable Procurement Policy
- Orange Guide
- Borusan Group Personal Data Protection and Processing Policy



