

 BOZLUholding	HUMAN RIGHTS AND GENDER EQUALITY POLICY	Belge No	BZL.İH.POL.003
		Revizyon No	0
Yayın Tarihi		07.06.2024	
Revizyon Tarihi			
Sayfa No		1/6	
İnsan Hakları Politikaları			

BOZLU HOLDING INCORPORATION

HUMAN RIGHTS AND GENDER EQUALITY POLICY

Version 0.1

JAN 1, 2024

HAZIRLAYAN	ONAYLAYAN	YÜRÜRLÜK ONAYI
İNSAN KAYNAKLARI BÖLÜMÜ	GENEL MÜDÜR	YÖNETİM KURULU

KontROLSÜZ KOPYA

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1. PURPOSE AND SCOPE

This Human Rights and Gender Equality Policy ("Policy") is a guide that includes human rights and gender equality approaches and standards to be followed by Bozlu Group¹ companies in their activities.

This Policy is binding for all Group Companies' employees and activities carried out and all Bozlu Group companies are responsible for acting in compliance with this Policy. Bozlu Group companies require all business partners to adopt the principles in this Policy and to act in accordance with the Policy to the extent applicable. Bozlu Group companies shall work to ensure that the principles listed in this Policy are adopted and disseminated by all relevant business partners.

The main reference source of the Policy is the policies and principles of international organisations, national and international legislation covering human rights and gender equality. The basic principles of Bozlu Group, which believes that the construction of a sustainable future can only be possible with the active participation of women in all areas of social life as equal individuals along with the value of human beings, is to provide its employees with a peaceful, safe, transparent, equitable, honest and fair working environment worthy of human dignity. Starting from recruitment, Bozlu Group shall act with the perspective of "providing equal opportunities for all", and complies with ethical principles and human rights in promotion and development processes, remuneration and determination of fringe benefits.

Bozlu Group shall not tolerate human rights violations and avoid being a party to these violations. In this context, practices such as child labour and forced labour are prohibited activities throughout Bozlu Group. Discrimination based on visible or invisible reasons such as race, colour, gender, religion, sect, marital status, sexual orientation, gender identity, philosophical opinion, political opinion or affiliation, ethnic identity, health status, family responsibilities, economic status, trade union activity or membership, physical disability or age is absolutely unacceptable in all human resources processes and within the working relationship.

¹ "Bozlu Holding" refers to the companies in which Bozlu Holding and/or its shareholders and managers have shares. "Bozlu Holding" refers to Bozlu Holding Inc.

HAZIRLAYAN İNSAN KAYNAKLARI BÖLÜMÜ	ONAYLAYAN GENEL MÜDÜR	YÜRÜRLÜK ONAYI YÖNETİM KURULU
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Bozlu Group management approach is based on respect for people. Human dignity is above all values. Bozlu Group adopts the principle of acting respectfully to human rights in its relations with all stakeholders.

2. GENERAL PRINCIPLES AND COMMITMENTS

Bozlu Group respects the rights of everyone directly or indirectly affected by its activities, especially its employees, shareholders, suppliers, subcontractors, business partners and customers, and attaches importance to equal opportunities. It takes into account the conditions of disadvantaged groups who are more vulnerable to human rights violations and inequality of opportunity.

Prevention of Child Labour and Forced Labour

Bozlu Group companies shall not accept any form of forced labour practices. They shall not allow any individual to work involuntarily or under threat, adopting a zero-tolerance policy against human trafficking and slavery.

The employment of children below the legal and internationally accepted norms for working age negatively affects their physical and psychological development, deprives them of their right to education and exploits their labour. Therefore, Bozlu Group companies shall adopt a zero-tolerance policy against child labour.

Bozlu Group prohibits child labour in accordance with the principle of no child labour set out in the "International Labour Organization's Declaration on Fundamental Principles and Rights at Work".

Zero Tolerance to Violence, Discrimination and Harassment

Bozlu Group is committed to creating a working environment free from all acts of ill-treatment in the workplace such as physical or psychological violence, bullying, humiliation, discrimination and harassment. The Group shall not tolerate any form of abuse, threats, harassment or bullying or situations that threaten peace and security.

Employees are also expected to refrain from discriminatory language and actions and to oppose any discriminatory behaviour.

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Equal Opportunities, Diversity and Inclusion

Diversity and inclusion is an organisational asset. At Bozlu Group, equal opportunities shall be provided for everyone in line with the requirements of the work, regardless of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or world view. It is preferred that employees have different cultures and experience backgrounds.

It is essential to apply objective criteria in remuneration, which is an important indicator of providing equal opportunities. In its remuneration policy, Bozlu Group shall guarantee that there is no discrimination in the remuneration of employees in similar positions.

It believes that equal treatment and equal opportunities for all employees and prospective employees is a fundamental right and supports flexible working conditions for employees with different needs.

It shall provide equal opportunity to everyone in all human resources processes, including performance measurement and evaluation, career planning, rewarding and promotion, training and development programmes and dismissal.

In the recruitment and promotion processes of companies, the suitability of the candidate's qualifications for the position is evaluated, the proportion of women shall be monitored at every step in the processes, and efforts to increase the proportion of women shall be planned when necessary.

Managers and employees shall take utmost care to use an egalitarian and inclusive language in all their discourses. Bozlu Group companies shall carry out activities to increase the awareness of managers and employees in this context.

They shall offer its employees a healthy, peaceful and safe working environment free from all kinds of mobbing, violence, harassment, pressure and threats. Employees who engage in such negative behaviour shall not be tolerated under any circumstances, and the necessary internal disciplinary and legal procedures shall be carried out against them.

They shall carry out activities to increase women's employment in value chains or throughout society, to prevent gender-based violence and acts of hate, and to provide opportunities for women to access education and employment.

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Healthy and Safe Working Environment

Providing a healthy and safe working environment is among the main priorities of all Bozlu Group companies. Necessary measures shall be taken to protect the health and safety of employees and other persons (suppliers, subcontractors, visitors, etc.) in the working sites. The requirements of the legal legislation on occupational health and safety and the principles of Bozlu Group's Occupational Health and Safety Policy shall be fully fulfilled.

Working Conditions

Bozlu Group shall act in accordance with the local legislation, laws and regulations of the country of operation in determining the working conditions. Flexible working conditions shall be offered to the employees by considering the characteristics of the work and the preferences of the employees. Local working hours and wage policy shall be adhered to. Employees shall be encouraged to use their leave regularly in order to support the balance between private and working life. In order to ensure fair remuneration, the relevant sectors and the local labour market situation and, where applicable, the provisions of collective bargaining agreements shall be taken into account in determining wages.

Supporting Employee Development

Bozlu Group shall provide opportunities to improve the knowledge and skills of its employees and to support their potential development areas. Employees shall be supported by internal and external trainings.

Protection of Confidentiality

At Bozlu Group, the personal information of each employee shall be protected by high-level data privacy measures. The provisions of the relevant legislation in force shall be taken as basis for the protection of confidentiality. Employees are expected to comply with the data privacy laws of the country of operation and Bozlu Group rules.

3. RESPONSIBILITY FOR IMPLEMENTATION

This Policy has been established by the Bozlu Group Compliance Committee and entered into force upon the approval of the Board of Directors.

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The Senior Management of Bozlu Group companies shall be responsible for the supervision of the realisation of the articles in the Policy, and the business units of Bozlu Group companies shall be responsible for its implementation limited to their own areas of responsibility, and the Human Resources Departments of the companies shall be responsible for monitoring the implementation of the Policy in the companies.

Bozlu Group companies operate in countries with different legal regulations. Where there are differences between this policy and applicable local legislation, the more stringent regulation in terms of human rights protection shall prevail, as far as binding local legislation permits.

Bozlu Group Compliance Committee may evaluate the implementation status of this policy through periodic audits.

4. MONITORING OF THE POLICY

This Policy shall be reviewed and evaluated annually by the Bozlu Group Compliance Committee. In the event of a significant change in the Company's practices that will affect the Policy, the Policy shall be harmonised with the changes by the Bozlu Group Compliance Committee. Amendments to the Policy shall enter into force upon the approval of the Board of Directors.

5. APPLICATIONS AND COMPLAINTS

Information requests, suggestions and complaints regarding the Policy can be submitted anonymously via the Bozlu notification channel (online form link should be given) or via the e-mail address uyum@bozlu.com.

No counter behaviour or attitude shall be displayed towards employees or other stakeholders who make notifications and complaints in good faith regarding behaviours contrary to the norms within the scope of this Policy.

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