

HUMAN RIGHTS POLICY

1. PURPOSE AND SCOPE

Human rights are fundamental rights and freedoms belonging to every individual without discrimination. As KLINGER Turkey, we recognize respect for these rights as a responsibility to be upheld throughout our production processes, employment practices, and business relationships.

This Policy defines our commitments to human rights, the allocation of responsibilities, and the manner in which reports of violations are handled. Our aim is to manage respect for human rights as a defined area of responsibility through established rules, measurable and traceable indicators, and an accessible reporting channel.

This Policy applies to all employees and managers working within KLINGER Turkey, interns, subcontractor employees, and representatives acting on behalf of the Company. We also apply these principles in our relationships with our suppliers, contractors, and business partners, and expect our suppliers to communicate the same expectations throughout their own supply chains.

2. ROLES AND RESPONSIBILITIES

- General Management is responsible for approving and implementing the Policy and allocating the resources necessary for its effective implementation.
- The Human Resources Department is responsible for implementing the Policy, keeping it up to date, and monitoring its performance. It oversees the compliance of recruitment, working conditions, remuneration, training, and performance management processes with this Policy.
- The Occupational Health and Safety (OHS) Department and the OHS Committee are responsible for the implementation of commitments relating to a safe and healthy working environment.
- The Ethics Committee evaluates and concludes human rights reports submitted through the Ethics Hotline on a confidential basis.
- The Procurement Department ensures that our human rights expectations are communicated to suppliers and incorporated into supplier assessment processes.
- Our managers are responsible for ensuring that this Policy is known and implemented within the teams under their responsibility. All employees are obliged to comply with the Policy and report any violations they identify.

HUMAN RIGHTS POLICY

3. COMPLIANCE WITH NATIONAL AND INTERNATIONAL LEGISLATION AND STANDARDS

We conduct our activities in compliance with all applicable legislation, primarily including **Turkish Labour Law No. 4857, Occupational Health and Safety Law No. 6331, Social Insurance and Universal Health Insurance Law No. 5510, and Personal Data Protection Law No. 6698**. We consider all legal requirements concerning working hours, remuneration, leave entitlements, and employee health as minimum standards.

At the international level, we refer to the **Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work** and its fundamental conventions, **the United Nations Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct**. We maintain our occupational health and safety practices within the framework of the ISO 45001 Management System and comply with the principles defined in the KLINGER Group Code of Conduct.

We monitor the European Union's regulations concerning corporate sustainability due diligence and sustainability reporting, particularly with regard to requirements that may extend to our value chain through our customers.

4. POLICY PRINCIPLES

- **Prevention of Discrimination and Equal Opportunity**

We base all our human resources processes, including recruitment, remuneration, training, promotion, and termination of employment, solely on the qualifications and merit required for the job. We do not permit discrimination based on gender, age, marital status, disability, ethnic origin, religion, political opinion, or any other similar characteristic.

We recognize that female employment has historically remained limited in the metalworking sector. Increasing the proportion of female employees and establishing measurable indicators to monitor gender-based pay distribution are identified as development priorities. We meet our legal obligations regarding the employment of persons with disabilities and take accessibility of the working environment into consideration. Our rules regarding the prevention of discrimination are further defined in our *Anti-Discrimination and Anti-Harassment Policy*.

- **Prevention of Violence and Harassment**

We do not tolerate any behavior that undermines the dignity of our employees, including physical, verbal, psychological, sexual, or digital harassment and mobbing. The rules and implementation principles in this area are defined in our Anti-Discrimination and Anti-Harassment Policy. Reports concerning such matters are investigated confidentially, and disciplinary procedures are initiated in cases where violations are substantiated.

HUMAN RIGHTS POLICY

- **Prevention of Child Labour and Forced Labour**

We strictly prohibit child labour and forced or compulsory labour in any form. This principle is supported by a control mechanism incorporated into our recruitment process: we request identification documents from candidates and verify age information during the social security registration process.

Under no circumstances do we accept the confiscation of employees' identification documents, forcing employees to work through debt bondage, or restricting their freedom to terminate the employment relationship. We apply the same expectation to our suppliers.

- **Safe and Healthy Working Environment**

In a production environment where welding, forming, assembly, and pressure testing operations are carried out, we consider ensuring safe working conditions to be our most tangible responsibility with regard to human rights. We conduct risk assessments, emergency preparedness and planning, periodic health surveillance, workplace environmental measurements, and the provision of personal protective equipment as part of this responsibility.

We recognize our employees' right to report hazards and to refuse to work in situations involving serious and imminent danger. We do not permit any adverse action against employees who exercise this right. We subject occupational accidents to root cause analysis and evaluate the findings through our OHS Committee to determine preventive measures.

- **Fair Remuneration and Working Hours**

We adopt as a fundamental principle that no employee shall be paid below the statutory minimum wage. We determine wages and benefits taking into account sector conditions and job requirements, and keep overtime within the limits prescribed by applicable legislation. We compensate overtime in accordance with legal requirements.

We sign a written employment contract with every employee. Our standard indefinite-term employment contract contains the same provisions for all employees, regardless of grade or level. We inform employees at least four weeks in advance of significant operational changes.

- **Freedom of Association and Social Dialogue**

We respect our employees' rights to join trade unions, organize, and engage in collective bargaining. We do not permit employees who exercise these rights to be subjected to any adverse treatment.

There are currently no unionized employees or collective bargaining agreements in force within our Company. Therefore, we maintain social dialogue through our employee representative

HUMAN RIGHTS POLICY

elected in accordance with applicable legislation, the OHS Committee, employee satisfaction surveys, and performance appraisal meetings.

- **Career Management and Training**

In a production environment where technical knowledge is transferred to a significant extent through experience, we consider training not only as part of our employees' right to development but also as a component of our quality assurance system. We conduct our training activities based on an annual training plan and monitor training hours per employee and the distribution of training among employee groups.

We conduct performance appraisals once a year and structure this process not merely as an assessment of the previous period's results, but also as a platform for dialogue regarding our employees' career expectations.

- **Personal Data Protection**

We process personal data belonging to our employees, candidates, customers, and business partners in accordance with Law No. 6698 on the Protection of Personal Data and applicable legislation. We collect, retain, and grant access to data only for defined purposes and to the extent necessary, with access rights restricted according to job responsibilities. We protect special categories of personal data, particularly health data, under a separate confidentiality regime.

- **Value Chain and Community**

We communicate our human rights expectations to our suppliers through contracts and undertakings. We include environmental and social criteria in our supplier assessment processes and, where we identify suppliers as presenting human rights risks, we initially seek to implement corrective actions.

We communicate our expectations regarding the use of minerals originating from conflict-affected areas to our suppliers. We consider the impact of our activities on local communities and prioritize local employment in our recruitment processes.

5. REPORTING AND GRIEVANCE MECHANISM

Our employees, subcontractor employees, suppliers, and other stakeholders affected by our activities may report human rights violations through the Ethics Hotline. Reports may also be submitted directly to a manager, the Human Resources Department, or the employee representative.

Reports are evaluated by the Ethics Committee. The identity of the person making the report and the content of the report are protected on a confidential basis. No retaliation may be taken against anyone who makes a good-faith report, provides information during an investigation,

HUMAN RIGHTS POLICY

or participates in the process. This protection covers not only our employees but also subcontractor employees, interns, and suppliers. The fact that a report is subsequently not substantiated does not, in itself, constitute bad faith. Any behavior constituting retaliation is subject to disciplinary proceedings independently of the violation that was reported.

Where an investigation confirms a violation, corrective and preventive actions are determined and steps are taken to remedy the resulting adverse impact. The number of reports and their status of resolution are regularly reported to senior management.

6. CONSEQUENCES OF NON-COMPLIANCE

Violations of this Policy are subject to the applicable disciplinary process depending on the nature and severity of the violation. Depending on the outcome of the process, sanctions up to and including termination of employment may be imposed. The relevant department manager is responsible for implementing corrective actions and monitoring their effectiveness.

If we identify practices by our suppliers or business partners that are inconsistent with the principles defined in this Policy, we request that corrective action be implemented within a reasonable period. In cases where serious violations are not remedied, suspension or termination of the business relationship may be considered.

7. MONITORING AND REPORTING

We monitor the implementation of this Policy through indicators collected as part of our Human Resources and Occupational Health and Safety processes. We evaluate the relevant indicators annually and use the results of these evaluations as a basis for determining development priorities for the following period.

8. EFFECTIVE DATE AND REVISION

This Policy enters into force upon approval by the General Manager. The Policy is reviewed at least once a year and updated when required by changes in legislation, organizational changes, or the results of relevant assessments.