



İÇDAŞ ÇELİK ENERJİ TERSANE VE ULAŞIM SANAYİ A.Ş.

## HUMAN RIGHTS POLICY

### 1. Introduction

İÇDAŞ is Turkey's leading steel company and exports to more than one hundred countries. The Company operates steel production, as well as energy, sea transportation, shipyard, mining and port operations. The İÇDAŞ's Human Rights Policy articulates our respect for all Human Rights.

The fundamental components of İÇDAŞ's Human Rights Policy are based on the Universal Declaration of Human Rights by the United Nations, International Labour Organization (ILO) Conventions, international human rights standards, and national legislations.

### 2. Purpose

The İÇDAŞ Human Rights Policy sets out the principles for our actions and behaviour in relation to human rights. The Policy and associated practices are expected to strengthen over time as İÇDAŞ's gains a better understanding of and becomes more experienced in promoting human rights.

### 3. Scope

This Policy applies to all employees in whole departments of İÇDAŞ. In addition, our subcontractors working at our sites are expected to comply with this Policy. In implementing this Policy, we are subject to the laws of the Republic of Turkey in which we operate and we are committed to comply with all such applicable laws.

### 4. Commitments to Stakeholders

We are committed to respect the human rights of our employees. We develop our employment policies with the aim to achieve uniform worldwide application of the relevant aspects contained in the International Human Rights Declarations.

We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring and contractual provisions.

We seek to respect human rights and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations.

### 5. Specific Provisions

#### - Promoting Health and Safety

İÇDAŞ is committed to work towards a goal of zero accidents and general wellbeing in the workplace. This is endorsed by the Health and Safety Policies and Procedures.

- **Promoting Freedom of Association**

İÇDAŞ respects our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. İÇDAŞ is committed to bargaining in good faith with such representatives.

- **Eliminating Forced Labour**

İÇDAŞ prohibits the use of all forms of forced labor, including prison labor, bonded labor, military labor, slave labor and any form of human trafficking.

- **Abolishing Child Labour**

İÇDAŞ adheres to minimum age provisions of applicable laws and regulations. The Company prohibits the hiring of individuals that are under 18 years of age which hazardous work is required. İÇDAŞ's prohibition of child labor is consistent with International Labor Organization standards.

- **Eliminating Discrimination in the Workplace**

İÇDAŞ values all its employees and their contributions. It has a deep-rooted commitment to equal opportunity and non-discrimination. Çalışanlarına karşı ayrımcılık yapmadan eşit bir tutum sergiler ve bu konuda ayrımcılığa asla müsamaha göstermez. We are dedicated to maintaining workplaces that are free from discrimination or physical or verbal harassment on the basis of race, sex, color, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, training, compensation and advancement at İÇDAŞ is qualifications, performance, skills and experience. İÇDAŞ conducts its approach towards its employees with the principle of "Right Person for the Right Job". It manages the processes of its employees with transparency depending on their qualifications, experience and performance. It respects diversity, which is an important element of organizational structure.

- **Providing Remuneration and Upholding Conditions of Employment**

İÇDAŞ aims to pay wages accordance with the criteria established in the industry which based on local market assessments and aims to pay equal wages that suitable their level for each position. İÇDAŞ complies with all laws regarding conditions of employment including basic and overtime working hours, and will abide by agreements negotiated with our employee representatives.

- **Workplace Security**

İÇDAŞ is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

- **Rude Behavior or Inhumane Treatment**

Physical abuse, sexual or other forms of harassment, verbal abuse, or any other types of intimidation are strictly prohibited.

## **6. Monitoring**

We welcome feedback from and dialogue with interested parties. Any feedback and comments regarding this Policy should be sent to the address below:

<https://www.icdas.com.tr/iletisimfrmtr.aspx>

The provisions of İÇDAŞ Human Rights Policy include the minimum standards, not the maximum, and it is aimed for our company to reach a level even higher than these standards.

08.08.2023

**General Manager**