

HUMAN RIGHTS POLICY

Gülermak Çelik Construction Industry and Trade Inc. undertakes to carry out all its activities within the framework of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work. Gülermak Çelik adopts respect for human rights for all its employees and stakeholders and aims to ensure that these rights are observed.

The Human Rights Policy covers all Gülermak Çelik employees, Board members, suppliers and business partners, intermediaries, contractors, proxy workers and all third parties with whom we do business. These real and legal persons are expected to comply with the Human Rights Policy. Gülermak Çelik; declares the Human Rights Policy in order to encourage its employees as well as its business partners and suppliers to act in accordance with the principles set forth in this Human Rights Policy.

- Employees are elected according to their free will and are free to terminate their employment relationship with the employer after a reasonable prior notice period. No receivables of employees can be seized as collateral or they cannot be asked to hand over their identity documents.
- Gülermak Çelik is committed to establishing a constructive dialogue with employee representatives freely elected by its employees without fear of reprisal. It values the ideas of its employees and creates work environments where they can express themselves freely. All employees, without discrimination, have the right to join or establish a labor union and to make collective labor agreements.
- Protecting the health and safety of employees and other people in the Gülermak Çelik work area is one of Gülermak Çelik's top priorities. Gülermak Çelik provides a safe and healthy work environment. Security services are provided in a manner that respects the dignity, confidentiality and reputation of each person when necessary. Gülermak Çelik implements the necessary safety measures in all work areas in accordance with the relevant legislation, especially the Occupational Health and Safety legislation. In case of detection of unsafe conditions or behaviors in the workplace, it immediately takes the necessary measures to ensure the health, safety and security of customers and employees.
- Gülermak Çelik is strongly against child labor, which causes physical and psychological harm to children and deprives them of their right to education. In addition, Gülermak Çelik is against all forms of forced

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labor, defined as involuntary and threatened labor. Gülermak Çelik has a zero-tolerance policy against slavery and human trafficking and expects all Business Partners to act in this direction.

- The wage determination process is created competitively according to the relevant sectors and the local labor market. All wages, including social fringe benefits; are determined at a level where workers can always meet their basic needs and make some optional additional expenses, considering the economic conditions and minimum living conditions, and are paid in accordance with the applicable laws and regulations.
- Gülermak Çelik complies with the legal working hours in order not to exceed the maximum weekly working hours. It is very important for employees to take regular breaks, take leave and establish a productive work-life balance.
- We embrace equal opportunities and respect diversity. Within the scope of diversity-enhancing practices, we carry out studies to increase the employment of women, different generations and the disabled. Decision-making processes in recruitment, training and development, career, performance and wage management; in the workplace, regardless of gender, pregnancy, ethnicity, religion, race, nationality, age, disability, marital status, sexual orientation, political views and similar issues, are based on the requirements of the job and personal qualities.
- Zero tolerance policy against discrimination is the basic principle in all recruitment, promotion, assignment and training processes. Gülermak Çelik expects all its employees to act with the same sensitivity in their behavior towards each other. Gülermak Çelik takes care to treat its employees equally by offering them equal rights and opportunities. No form of discrimination and disrespect based on race, gender, color, nationality, religion, age, disability, sexual orientation and political views is allowed.
- We value the full and effective participation of women in the decision-making processes of economic and social life. In light of our commitment to contribute to the goals of inclusive growth and gender equality in working life, we have signed the Women's Empowerment Principles (WEPs) in 2023. As a signatory to the WEPs, we promote gender equality in our company.
- Regular employment is provided within the scope of national laws and practices.
- Gülermak Çelik is committed to providing a working environment where mistreatment, intimidation, harassment and violence are not tolerated, and where there are no conditions that threaten security or are disturbing. We are sensitive about protecting the personal rights of our employees, and apply

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appropriate sanctions in case of any violation of personal values with any kind of psychological pressure and harassment, or emotional attacks.

- Gülermak Çelik acts in accordance with global ethical principles in matters such as recruitment, promotion and career development, and offers its employees opportunities to develop their talents and potential. Seeing human capital as a valuable resource, Gülermak Çelik supports its employees with internal and external trainings and strives for their comprehensive personal development.
- Gülermak Çelik applies high-level data privacy standards to protect the personal information of its employees. Data privacy standards are implemented in accordance with relevant legislation. Gülermak Çelik expects its employees to comply with relevant data privacy laws.
- Gülermak Çelik respects all legal and voluntary political participation of its employees. However, employees should carry out their political activities outside of working hours and refrain from using Gülermak Çelik resources for these activities.
- We do not engage in initiatives that will cause crime or violation of rights. We expect our employees to exhibit the same behavior.
- We respect the rights of communities affected by Gülermak Çelik's activities. We actively carry out the necessary work to identify all negative impacts on human rights, avoid these impacts, evaluate risks and prevent them before they occur.

In case of any doubt regarding the content of the Human Rights Policy and/or witnessing a behavior or practice that violates the rules, anyone who wishes to report/complain or seek advice can report the situation at etik@gulermaksteel.com.

It is essential that the identity of the persons reporting the violation is kept confidential within the framework of legal and administrative requirements.

The Ethics Committee established by the Board of Directors is authorized and responsible for the evaluation and resolution of complaints, reports and allegations sent to the Ethical Principles Reporting Line. In this context; the transmitted violation information is evaluated by the Ethics Committee.

The necessary work, examination or investigation regarding the complaints, claims and reports received by the Violation Reporting Line is carried out by the Ethics Committee.

Gülermak prohibits retaliation against any person who reports such a concern.

This policy is reviewed and updated in line with the needs.

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