



HUMAN RIGHTS  
POLICY

# TABLE of CONTENTS

<b>1. Purpose and Scope</b> .....	<b>03</b>
<b>2. Definitions</b> .....	<b>03 - 05</b>
<b>3. General Principles</b> .....	<b>05</b>
<b>4. Commitments</b> .....	<b>06 - 08</b>
<b>5. Authority and Responsibilities</b> .....	<b>08 - 09</b>
<b>6. Revision History</b> .....	<b>09</b>

# 1. Purpose and Scope

This Human Rights Policy (“**the Policy**”) is prepared for Entek in accordance with Koç Group Human Rights Policy<sup>1</sup>. This Human Rights Policy (“**the Policy**”) is a guide that reflects Entek’s approach and standards with respect to human rights and demonstrates the importance that Entek attaches to respect for human rights.

All employees, directors and officers of Entek shall comply with this Policy. Entek also expects and takes the necessary steps to ensure that all of its Business Partners - to the extent applicable - comply with and/or act in accordance with this Policy.

# 2. Definitions

“**Business Partner**” includes authorized service and/or solution providers with whom Entek cooperates in matters such as, but not limited to, specific business models or project development, suppliers and other third parties with whom the company has a business relationship and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company, as well as their employees and representatives.

“**Entek**” means companies which are controlled directly or indirectly, jointly or individually by Entek Elektrik.

“**Entek Elektrik**” means Entek Elektrik Üretimi A.Ş.

“**Human rights**” are rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, difference of thought, national or social origin, and wealth. This includes the right to an equal, free and dignified life, among other human rights.

“**Koç Group**” means Koç Holding A.Ş., companies which are controlled directly or indirectly, jointly or individually by Koç Holding A.Ş. and the joint venture companies listed in its latest consolidated financial report.

“**The ILO**” means The International Labor Organization

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(1) <https://www.koc.com.tr/about-us/code-of-ethics-and-compliance-policies>

**“The ILO Declaration on Fundamental Principles and Rights at Work”<sup>2</sup>** is a ILO declaration adopted that commits all member states whether or not they have ratified the relevant Conventions, to respect, and promote the following four categories of principles and rights in good faith:

- freedom of association and effective recognition of collective bargaining,
- Elimination of all forms of forced or compulsory labor,
- abolition of child labor,
- Elimination of discrimination in employment and occupation.

**“The OECD”** means The Organization for Economic Co-operation and Development

**“The OECD Guidelines for Multinational Enterprises”<sup>3</sup>** aims to develop a state-sponsored corporate responsibility behavior that will maintain the balance between competitors in the international market, and thus, increase the contribution of multinational companies to sustainable development.

**“The UN”** means the United Nations.

**“The UN Global Compact”<sup>4</sup>** is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption.

**“The UN Guiding Principles on Business and Human Rights”<sup>5</sup>** is a set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations.

**“The Universal Declaration of Human Rights (UDHR)”<sup>6</sup>** is a milestone document in the history of human rights, drafted by representatives with different legal and cultural backgrounds from all regions of the world, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected.

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(2) <https://www.ilo.org/declaration/lang--en/index.htm>

(3) <http://mneguidelines.oecd.org/annualreportsontheguidelines.htm>

(4) <https://www.unglobalcompact.org/what-is-gc/mission/principles>

(5) [https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

(6) <https://www.un.org/en/universal-declaration-human-rights/>

**“The Women’s Empowerment Principles”**<sup>7</sup> (WEPs) a set of Principles offering guidance to business on how to promote gender equality and women’s empowerment in the workplace, marketplace and community. Established by UN Global Compact and UN Women, the WEPs are informed by international labor and human rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women’s empowerment.

**“Worst Forms of Child Labour Convention (Convention No. 182)”**<sup>8</sup> means the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour.

### 3. General Principles

As a global group, Entek is guided by the Universal Declaration of Human Rights (UDHR) and maintains a respectful understanding of Human Rights for its stakeholders in the countries where it operates. Creating and maintaining a positive and professional working environment for its employees is the main principle of Entek. Entek acts in accordance with global ethical principles in areas such as recruitment, promotion, career development, wages, benefits and diversity, and respects the rights of its employees’ to form and join organizations of their choice. Forced and child labor as well as all forms of discrimination and harassment are expressly prohibited.

Entek primarily adheres to following international human rights standards and principles :

- The ILO Declaration on Fundamental Principles and Rights at Work (1998),
- The OECD Guidelines for Multinational Enterprises (2011),
- The UN Global Compact (2000),
- The UN Guiding Principles on Business and Human Rights (2011),
- The Women’s Empowerment Principles (2011),
- Worst Forms of Child Labour Convention (Convention No. 182, 1999).

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(7) <https://www.weps.org/about>

(8) [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C182](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182)

## 4. Commitments

Entek respects the rights of its employees, directors, officers, shareholders, Business Partners, customers, and any other individuals affected by its operations, products or services by complying with the principles of the Universal Declaration of Human Rights (UDHR) and the ILO Declaration on Fundamental Principles and Rights at Work.

Entek is committed to treating all employees honestly and fairly and to providing a safe and healthy working environment that respects human dignity while avoiding discrimination.

Entek may also apply additional standards that take into account vulnerable and disadvantaged groups that are more susceptible to negative Human Rights impacts and require special attention. Entek takes into account the specific circumstances of groups whose rights are further elaborated in United Nations instruments: indigenous peoples; women; ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families, as referred to in the UN Guiding Principles on Business and Human Rights.

### **Diversity and Equal Recruitment Opportunities**

Entek is committed to employing people from diverse cultures, professional experiences and backgrounds. Recruitment decisions are based on job requirements and personal qualifications regardless of race, religion, nationality, gender, age, marital status or disability.

### **Non-Discrimination**

Zero tolerance towards discrimination is a key principle in the entire employment process, including promotion, assignment and training. Entek expects all its employees to show the same sensitivity in their behavior towards each other.

Entek strives to treat its employees equally by providing equal rights and opportunities. All forms of discrimination and disrespect based on race, gender, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition or political opinion are unacceptable.

### **Zero Tolerance to Child / Forced Labor**

Entek strongly opposes child labor, which causes children's physical and psychological harm to children, and interferes with their right to education.

In addition, Entek opposes all forms of forced labor, which is defined as work that is performed involuntarily and under the threat of any penalty.

In accordance with the conventions and recommendations of the ILO, the Universal Declaration of Human Rights, and the UN Global Compact, Entek has a zero-tolerance policy towards slavery and human trafficking and expects all its Business Partners to act accordingly.

### **Freedom of Organization and Collective Bargaining**

Entek respects the right and freedom of choice of its employees to join a trade union, and to collectively bargain collectively without fear of retaliation. Entek is committed to a constructive dialogue with the freely chosen representatives of its employees, represented by a legally recognized trade union.

### **Health and Safety**

Protecting the health and safety of employees, and other persons who are present in a work area for any reason is one of the main concerns of Entek. Entek provides a safe and healthy working environment. Entek take the necessary safety measures in the workplace in a manner that respects the dignity, privacy, and reputation of each individual. Entek complies with all relevant regulations and implements all necessary safety measures in all its work areas.

If any unsafe conditions or unsafe behavior are detected in the work areas, Entek shall immediately take the necessary measures to ensure the health, safety, and security of their customers and employees.

### **No Harassment or Violence**

A key aspect of protecting the personal dignity of employees is ensuring that harassment or violence does not occur or, if it does occur, sanctioned adequately. Entek is committed to providing a workplace free from violence, harassment, and other unsafe or disturbing conditions. As such, Entek does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats.

### **Working Hours and Remuneration**

Entek respects the legal working hours in accordance with the local regulations of the countries in which it operates. It is important for employees to have regular breaks, vacations, an effective work-life balance.

Wages are determined in a competitive manner according to the relevant sectors and the local labor market, and where applicable, in accordance with the terms of collective bargaining agreements if applicable. All compensation, including social benefits are paid in accordance with the applicable laws and regulations.

Employees may request further information on the laws and regulations governing working conditions in their own countries from Entek Elektrik's Legal and Compliance Department.

### **Personal Development**

Entek provides its employees with opportunities to develop their talents and potential, and to enhance their skills. Considering human capital as a valuable resource, Entek strives for the comprehensive personal development of its employees by supporting them with internal and external trainings.

### **Data Privacy**

In order to protect the personal data of its employees, Entek maintains high data protection standards. The data protection standards are implemented in accordance with the relevant legislations.

Entek expects its employees to comply with the data protection laws of each of the country in which it operates.

### **Political Activities**

Entek respects the legal and voluntary political participation of its employees. Employees may make personal donations to a political party or a political candidate or engage in political activities outside working hours. However, it is strictly forbidden to use company funds or other resources for such donations or any other political activities.

## **5. Authority and Responsibilities**

All employees and directors of Entek are responsible for complying with this Policy, implementing and supporting the Entek's procedures and controls in accordance with the requirements of this Policy. Entek also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable, comply with and/or act in accordance with this Policy.



If there is a discrepancy between the local regulations, applicable in the countries where Entek operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations.

If you become aware of any action that you believe is inconsistent with this Policy, the applicable law or the Koç Group Code of Ethics or Ethical Rules, you may seek guidance or report the incident to your line manager. Alternatively, you may report the incident to the hotline through: “[koc.com.tr/hotline](https://koc.com.tr/hotline)”

Entek employees may contact the Entek Elektrik’s Group Directorate of Shared Services and Transformation for their questions regarding to this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

## 6. Revision History

This Policy takes effect on 28.09.2022 as of the date approved by Entek Elektrik’s Board of Directors and for each Entek company, it will take effect on the date of Board of Directors approval of relevant company. This Policy will be maintained by Entek Elektrik’s Group Directorate of Shared Services and Transformation.

Revision	Date	Comment
V.01	30.09.2021	
V.02	28.09.2022	
V.03	05.02.2024	Business Partners definition has been updated. The expressions that cause ambiguities have been improved.