

Human Rights Policies

Kale Group, taking the Universal Declaration of Human Rights and the United Nations Global Compact as reference points, places compliance with human rights at the core of all its activities.

While performing all duties and responsibilities, employees must act in full compliance with the applicable laws, international agreements to which Türkiye is a party, regulations, and the Group's human rights policies.

Harassment, discrimination, or demeaning conduct is not tolerated. Recruitment processes are conducted based on the technical requirements of the position and a competency-based evaluation. No discrimination is committed on the grounds of language, religion, race, or gender. Equal opportunity is one of the Company's fundamental principles, and every individual is assessed with equal rights. In this context:

- **Fundamental Human Rights:** Kale Group demonstrates full compliance with human rights in all its activities. Employees shall act in line with the Company's human rights approach and strictly observe international treaties to which Türkiye is a party (e.g., the International Labor Organization), as well as local laws, minimum age limits, and the principle of not employing child labor.
- **Equality and Prohibition of Discrimination:** Recruitment decisions are made through a competency-based assessment aligned with the technical requirements of the position. Under no circumstances shall there be discrimination based on language, religion, race, or gender. Equal opportunity is one of the Company's fundamental principles, and every individual is assessed with equal rights.
- **Child Labor and Forced Labor:** The age and duty principles stipulated by laws and regulations are strictly observed, and forced labor is absolutely prohibited.
- **Anti-Corruption:** Kale Group adopts a zero-tolerance approach to all forms of corruption and bribery. The United Nations Global Compact's 10th principle requires businesses to work against corruption in all its forms, including bribery. The primary duty in combating corruption and abuse lies with company management. Anti-corruption and anti-fraud efforts are carried out under the management, guidance, and oversight of the Internal Audit and Corporate Risk Management teams. Within this scope, the Internal Audit team conducts the necessary processes. These processes identify improvement areas in authority/approval workflows that may give rise to corruption and abuse, and actions are set to ensure their remediation.

- **Safe and Healthy Working Environment:** Through occupational health and safety management systems, accidents, injuries, occupational diseases, and health risks are monitored, and actions are taken to improve working environments.
- **Employee Development and Well-Being:** Training, competency development, and talent management programs are administered; employees' career development, well-being, and work-life balance are supported.
- **Confidentiality and Data Protection:** Kale Group employees have a responsibility to diligently protect information belonging to all internal stakeholders, consumers, suppliers, and third parties. Employees shall use the information they obtain solely for business purposes, shall under no circumstances exploit any vulnerabilities of customers, suppliers, or other stakeholders, and shall not seek to derive advantage from any lack of information or errors.

Governance of Human Rights Policies

The identification, prioritization, and monitoring of human rights risks are carried out jointly by the Company's Human Resources departments, Company General Managers, the Ethics Committee, and the Disciplinary Committee.

In addition, the Group Sustainability Committee bears responsibility for leading sustainability related activities across all group companies. The Committee sets Kale Group's sustainability roadmap and monitors progress in this direction. It also tracks global and local developments, assesses sustainability risks that may affect group companies, and steers the relevant risk management processes.

Creating a working environment in which Kale Group employees can voice their questions or concerns, in line with the principles set out in the Code of Ethics Regulation, is a fundamental objective. Employees' reporting of situations they witness in the workplace that are unethical or non-compliant, unlawful, or that they believe could harm Kale Group's assets helps eliminate ethical problems that could lead to more serious consequences in the long term.

Through the Kale Group Ethics Line Communication Channels, opinions may be sought from the Ethics Committee Secretariat on any ethical issues and dilemmas. Kale Group employees may choose to remain "Anonymous" and submit notifications without sharing personal contact information via the Kale Group Ethics Line Communication Channels at the web address <http://etikhat.kale.com.tr>.

The Ethics Committee Secretariat conducts a preliminary assessment regarding the review of the notification and convenes the members of the Ethics Committee. If it is concluded that there is evidence indicating the existence of a violation in the notification, the Ethics Committee requests that an investigation/review be initiated. Topics that may be reported include, foremost among financial data, corruption, bribery, workplace bullying (mobbing), child labor, abuse, fraud, violations of human rights principles, environmental violations, and non-conformities in occupational health and safety (OHS) practices.

All notifications made in good faith help to protect Kale Group's interests. For this reason, measures have been put in place by Kale Group to protect those who make notifications.

- **Non-Retaliation:** In line with a "zero tolerance" philosophy, Kale Group strictly prohibits any retaliation against the owners of notifications. The provisions and principles of the applicable Disciplinary Regulation are enforced against any Kale Group employee who engages in retaliation.
- **Confidentiality:** The confidentiality of notifications is preserved, considering the requirements of the review work carried out, the interests of the relevant parties, and Kale Group's legal obligations.
- **Protection of Identity:** Kale Group keeps the identity of the notifying person confidential within the framework of its legal obligations and takes the necessary measures to protect personnel records and rights.

Together with Kale Group employees, suppliers are also expected to respect human rights; not to engage in forced or child labor; not to permit discrimination; to provide safe working conditions; and to maintain emergency preparedness.

In carrying out projects related to human rights, the rights and well-being of all stakeholders are safeguarded; contributions such as employment, training, and community investments are prioritized, and the views of all stakeholders are incorporated into project processes.

Kale Group employees, managers, intermediaries, and suppliers may not offer, give, request, or accept bribes or improper payments to or from any public official or private individual. Attempts to obtain benefits under the guise of bribes, gifts, or hospitality are rejected.