

BATI ANADOLU GROUP HUMAN RIGHTS POLICY

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BATI ANADOLU GROUP HUMAN RIGHTS POLICY

1. Purpose and scope

The purpose of Batı Anadolu Group Companies Human Rights Policy (**“Policy”**) is to ensure that Batı Anadolu Çimento Sanayii A.Ş. and its subsidiaries over which it has direct and indirect control (**“Batı Anadolu Group Companies”**), especially its employees; To emphasize the importance it attaches to approaches and standards based on Human Rights , in parallel with the understanding of economic, environmental and social sustainability for its business and solution partners, suppliers and contractors .

The main reference source of the policy is the policies and principles of international organizations, national and international legal legislation covering Human Rights . In this context; Batı Anadolu Group Companies observe and implement the following Human Rights legislation in their activities.

- United Nations Universal Declaration of Human Rights
- United Nations Global Compact
- Principles of Women's Empowerment
- International Labor Organization Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- Other relevant national and international legal regulations.

The vision and mission of Batı Anadolu Group Companies is to all its employees during their employment in all its activities carried out within the framework of the basic principles of Human Rights; To provide a peaceful, safe, transparent, equitable, honest and fair working environment that befits human dignity. Beginning with the recruitment, promotion and development processes of employees at all levels, and determining remuneration and fringe benefits, Batı Anadolu Group Companies Business Ethics Rules and Working Principles (**“Business Ethics Rules and Working Principles”**) and Human Rights are complied with.

Human Rights violations are not tolerated within Batı Anadolu Group Companies, and being a party to these violations is avoided.

Batı Anadolu Group Companies Human Resources Departments (**“Human Resources”**) consider race, nationality, color, religion, language, age, sect, marital status, sexual orientation, gender identity,

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philosophical view, political view or gender in all business processes and business relationships. It does not discriminate based on visible or non-visible reasons such as belonging, ethnic identity, health status, family responsibilities, economic status, union activity or membership, physical disability.

2. Definitions

2.1. United Nations Universal Declaration of Human Rights:

The United Nations Universal Declaration of Human Rights (**“Declaration”**) is a landmark document in the history of Human Rights. The Declaration states that Human Rights should be accepted as a universal standard for all humanity , without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or any other status. declares and expresses that he/she has the freedom to act, alone or in a group, the right to own property, freedom of thought, conscience and religion, freedom of expression, freedom of peaceful assembly and association.

2.2. United Nations Global Compact:

The United Nations Global Compact (**“ UNGC ”**) is a convention declared by the United Nations. The convention calls on companies to adhere to established principles regarding Human Rights , labor standards, environmental protection and the fight against corruption. Companies are committed to creating a better space for society and the environment by adopting and implementing the set principles.

2.3. Principles of Women's Empowerment:

United Nations Women's Empowerment Principles (**“ WEPs ”**): A global framework developed by the United Nations. The principles mentioned were created to encourage women's economic participation, ensure their participation in leadership roles, secure their fundamental rights such as education and health, and support gender equality. The relevant principles encourage the business world to take action on gender equality and women's rights.

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2.4. Declaration of Fundamental Principles and Rights at Work:

The Declaration of Fundamental Principles and Rights at Work is a document adopted by the International Labor Organization (“ILO”) and aims to protect employee rights and employee standards. The said declaration aims to effectively recognize fundamental human rights, the freedom to form unions and the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the prevention of child labor and the elimination of discrimination during employment.

2.5. United Nations Guiding Principles on Business and Human Rights:

The United Nations Guiding Principles on Business and Human Rights are a framework developed to protect and promote Human Rights in the business world. These principles aim to ensure that companies commit to respecting Human Rights , improve labor standards, prevent discrimination and protect employee rights.

2.6. Human rights

Human rights are the set of universal, equal and inviolable rights and freedoms that every human being has from birth. These rights and freedoms aim to protect people's dignity and promote their freedom and well-being. Human rights enable everyone to benefit equally, without discrimination, without oppression and based on the rule of law. Human rights are universal and linked to human dignity. These rights are protected by international conventions and agreements and are the responsibility of states, societies and individuals.

3. General Principles and Commitments

and respect the Human Rights of everyone who is directly or indirectly affected by their activities, especially their employees, shareholders, suppliers, subcontractors, business and solution partners and customers. hears.

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Batı Anadolu Group Companies treat all their employees honestly and fairly, and undertake the responsibility of providing a safe and healthy working environment that respects human dignity by avoiding discrimination.

3.1. Zero Tolerance for Child Labor and Forced Labor

Batı Anadolu Group Companies are strictly against child labor. Batı Anadolu Group Companies reject all forms of child labor that cause physical and psychological harm to children and take away their right to education, and follow a zero-tolerance policy against such practices.

Batı Anadolu Group Companies also take the necessary measures to prevent forms of ill-treatment such as forced labor in recruitment processes and the supply chain. It raises awareness among its employees by organizing in-company training on this subject and aims to raise awareness in society.

Batı Anadolu Group Companies acknowledge that the values and mission contained in this Policy regarding the protection and promotion of Human Rights are a reflection of the Batı Anadolu Group Companies. Batı Anadolu Group Companies expect all employees to adopt and implement these principles.

3.2. Prevention of Discrimination

A zero tolerance policy against discrimination is the fundamental principle in all our recruitment, promotion, appointment and training processes. Batı Anadolu Group Companies expect all their employees to act with the same sensitivity in their behavior towards each other.

Batı Anadolu Group Companies take care to treat their employees equally by offering equal pay for equal work, equal rights and opportunities. Any form of discrimination or disrespect based on race, gender (including pregnancy), colour, nationality, religion, age, disability, sexual orientation, family status, sensitive medical condition, union membership and activities, and political opinion is not tolerated.

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3.3. Equity, Diversity and Inclusion

Diversity and inclusion are corporate assets. In the Batı Anadolu Group, everyone can work in accordance with the requirements of the job, regardless of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or world view.

Batı Anadolu Group Companies attach great importance to the principle of equality by offering their employees equal pay for equal work, equal rights and opportunities. In this context, Batı Anadolu Group Companies; It rejects any discrimination and disrespect such as race, gender, colour, nationality, religion, age, disability, sexual orientation, family status, sensitive medical condition, union membership and activities and political opinion.

Any discrimination or discriminatory behavior among employees within Batı Anadolu Group Companies is not allowed. It is a fundamental principle within Batı Anadolu Group Companies that everyone is respected and treated equally. In this regard, a fair and transparent approach is adopted in all business processes, from recruitment to promotion and promotion opportunities.

3.4. Zero Tolerance for Harassment and Violence

Harassment and violence are absolutely not tolerated within Batı Anadolu Group Companies. Batı Anadolu Group Companies is committed to providing a safe and comfortable working environment for its employees.

Physical, verbal, sexual or psychological harassment, bullying, abuse or threats of any kind are not tolerated. Sanctions are imposed by the Batı Anadolu Group Companies Ethics Committee (**“Ethical Committee”**) against our employees who exhibit such behavior and the reputation of our employees is protected.

At Batı Anadolu Group Companies, the safety and well-being of employees is kept at the highest level and a zero tolerance policy is followed against all kinds of harassment and violence.

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3.5. Healthy and Safe Working Environment

Batı Anadolu Group Companies are committed to a healthy and safe working environment for their employees. The health and safety of employees and other people in the areas of activity of Batı Anadolu Group Companies (suppliers, contractors, subcontractors, business and solution partners, visitors, etc.) is the priority of Batı Anadolu Group Companies.

The requirements of the legal legislation on occupational health and safety are fully fulfilled. At the same time, appropriate measures are taken in work areas and continuous improvements are made to prevent work accidents and health problems.

Batı Anadolu Group Companies, especially their employees with whom they have business relations; It works actively to ensure the health and safety of contractors, suppliers, business and solution partners and organizes continuous improvement and training programs in this field.

3.6. Working Conditions and Personal Development

Batı Anadolu Group Companies comply with the maximum weekly working hours determined by the legal legislation. It recognizes that ensuring employees take regular breaks and leaves is an important priority for them to achieve a productive work-life balance.

The wage determination process is carried out in a competitive manner, in accordance with the relevant labor market standards and the provisions of the collective bargaining agreement, if any. All wages are paid in accordance with applicable laws and regulations, including benefits.

Batı Anadolu Group Companies take all necessary measures to protect the rights of its employees and ensure a fair working environment and fully comply with legal regulations.

Batı Anadolu Group Companies offer opportunities to their employees to develop their skills and potential. Our companies, which see human capital as a valuable resource, strive for the personal development of their employees by supporting them with internal and external training.

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3.7. Right to Trade Union Organization and Collective Bargaining

Batı Anadolu Group Companies respect the rights of their employees to unionize and organize and ensure that they can freely exercise these rights. It allows unions established in accordance with legal regulations and the organization of employees. Employees can become members of unions and take part in their management with their free will, without any pressure or fear.

Batı Anadolu Group Companies develop constructive relationships with representatives of a legal union and cooperate when necessary.

4. Security

Batı Anadolu Group Companies protect the personal data of each employee with the highest level of personal data protection methods. Batı Anadolu Group Companies fully comply with the provisions of the applicable legislation regarding the protection of privacy within the framework of the Personal Data Protection Law No. 6698 (“**KVKK**”) and other legislation.

In this context; Appropriate information is provided regarding the processed personal data of especially employees, contractors, suppliers, business and solution partners who have business relations with Batı Anadolu Group Companies, and their express consent is obtained when necessary within the scope of KVKK. As Batı Anadolu Group Companies, we comply with appropriate storage conditions and authorization principles regarding the special personal data of our employees and those with whom we have business relations listed above. In other words, access to sensitive personal data that carries the risk of discrimination against the data subject is limited and can only be accessed by authorized persons when necessary.

As Batı Anadolu Group Companies, we take all necessary precautions to protect employees' personal information and respect privacy. Our employees and relevant persons are informed about the relevant person applications to be made within the scope of protection of personal data, and the form for the said application is presented to the relevant person on the website of the relevant Batı Anadolu Group Company in Word format.

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5. Political Activities

Engaging in political activities is a constitutional right as well as an internationally recognized human right. Batı Anadolu Group Companies respect the right of its employees to individual and voluntary participation in legal political activities arising from the constitution. However, employees must perform these activities outside working hours and do not use company resources for political activities.

Batı Anadolu Group Companies are not party to any political views or ideology. Its resources cannot be used to support political parties and candidates, and promotional and donation activities cannot be carried out in support of a political movement. Propaganda activities of political parties and candidates are not allowed at Batı Anadolu Group Companies locations.

Employees of Batı Anadolu Group Companies must observe the following conditions in the political activities they engage in individually and voluntarily:

- Employees must avoid situations that may create a conflict of interest in their current duties and responsibilities due to the political activities in which they are involved.
- The company name, title within the company and resources belonging to Batı Anadolu Group Companies cannot be used in political activities carried out individually. •Political propaganda cannot be made during working hours and the workplace environment, employees cannot be asked to become members of a political party in any way, and other employees' time cannot be taken up regarding these activities.

6. Responsibility

Employees and managers of Batı Anadolu Group Companies at all levels, including senior management, are responsible for complying with, implementing and supporting this Policy . Batı Anadolu Group Companies expect and support all suppliers, contractors, business and solution partners to comply with the Policy.

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7. Reporting Policy Violations

If you become aware of behavior and practices that violate this Policy or applicable Human Rights legislation, you can forward your notifications to the Batı Anadolu Group Companies to the e-mail address or postal address below.

The Human Resources Department is responsible for the regulation, review and renewal of this policy. The Human Resources Directorate may receive support from the Legal Consultancy within this scope.

Email:	etik@batianadolu.com
Address	Ankara Street No: 335- Bornova/İZMİR / Attention to Ethics Committee Batiçim Batı Anadolu Çimento Sanayi A.Ş.

8. Publication, Storage and Update Frequency of the Policy

This Policy is published by the Human Resources Department with the decision of the Batı Anadolu Group Companies Executive Board ("**Executive Board**") and stored electronically.

The policy is reviewed or ensured to be reviewed by the Human Resources Directorate at least once a year and updated if necessary.

9. Entry Into Force

Batı Anadolu Group Companies Human Rights Policy comes into force with the decision of the Executive Board. Company employees at all levels are responsible for managing business processes in the administrative and commercial functions they are responsible for in accordance with this policy.

GÜLANT CANDAŞ

Deputy Chairman of the Board of Directors

Executive Director