

**COMPANY:** SÖĞÜT İNŞAAT A.Ş.  
**DOCUMENT NO:** SGT-KRY-POL-003  
**DOCUMENT TITLE:** HUMAN RIGHTS POLICY  
**REVISION NO:** 01

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# 1. PURPOSE AND SCOPE

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The purpose of Söğüt İnşaat Human Rights Policy ("Policy") is to set forth Söğüt İnşaat's major principles applicable to the employees of Söğüt İnşaat A.Ş. along with its Group Companies ("Söğüt İnşaat" or "Group") as well as Third Parties as to the human rights.

Söğüt İnşaat and parties acting on behalf of Söğüt İnşaat are obliged to act in compliance with this Policy whereby other Third Parties with which Söğüt İnşaat is working (customers, suppliers, business partners, etc.) are expected to comply with these provisions. Söğüt İnşaat makes reasonable endeavors to manage and monitor Third Party employers' performance. Söğüt İnşaat A.Ş.' Board of Directors is responsible for the monitoring; the Human Resources Department is responsible for the implementation of this Policy, and all Söğüt İnşaat employees are required to adhere.

## Definitions and Abbreviations

- **Control:** In relation to a company, the ability of any person directly or indirectly to (i) appoint and/or remove a majority of the board of directors; (ii) exercise, or direct the exercise of, more than 50% of the voting rights of that company; (iii) or exert control by virtue of special shareholder rights.
- **Forced or Compulsory Labour:** Any work or service performed by any person under the threat of force or punishment and not performed voluntarily.
- **Harassment:** All kinds of verbal, written, physical, and visual attitude that disturbs the other party by humiliating, attacking, and/or insulting the person's language, race, color, gender, political opinion, union membership, belief, age, physical disability, sexual orientation, military status, or purely personal characteristics.
- **Human Rights:** Rights inherent in all human beings, regardless of language, race, skin color, gender, political view, union membership, religion, age, physical disability, sexual orientation, military status, or any other status. Human rights consist, without limitation, of the right to life and liberty, freedom from slavery and torture, freedom of thought and expression, and the right to work and education. Without discriminating, everyone has these rights.
- **ILO:** International Labour Organization.

- **ILO Declaration on Fundamental Principles and Rights at Work:** Even if they have not ratified the relevant conventions, all member states of the ILO are, in good faith, obliged to:
  - a. Respect, promote, and realize the freedom of association and the effective recognition of the right to collective bargaining,
  - b. Eliminate all forms of forced or compulsory labour,
  - c. Prevent child labour,
  - d. Eliminate discrimination in respect of employment and occupation.
- **Retaliation:** Any negative situation that the whistle-blowers may encounter due to the notification they made.
- **Söğüt İnşaat or Group:** Söğüt İnşaat A.Ş. along with its affiliates and/or subsidiaries directly or indirectly controlled by Söğüt İnşaat A.Ş.
- **Sensitive Group:** Groups that are at a higher risk in terms of discriminatory practices, violence, natural and environmental disasters, or economic hardship, than other groups.
- **Subsidiary:** A company in which the holding company (i) Controls the composition of the board of directors; or (ii) exercises or Controls more than one-half of the total share capital.
- **Third Party:** People or companies with whom Söğüt İnşaat engages in commercial activities including without limitation suppliers, customers, contractors, and business partners.
- **United Nations Global Compact:** The convention comprising the basic responsibilities of the business world in human rights, labor standards, environment, and anti-corruption areas, based on the United Nations declarations. Söğüt İnşaat acts in alignment with the United Nations Global Compact principles.
- **Women's Empowerment Principles:** The set of principles that guide business in promoting gender equality and women's empowerment in the workplace, in the marketplace, and in society by the Women's Empowerment Principles-WEPs platform established in partnership with the United Nations Global Compact and UN Women.

## 2. GENERAL PRINCIPLES

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Söğüt İnşaat acknowledges universally accepted principles that center the concepts of human rights and labor standards. Söğüt İnşaat adopts the principles and rules of the WEPs platform and admits these responsibilities as inevitable for its long-term success.

In addition to the foregoing, Söğüt İnşaat takes cognizance of the following international standards and principles as to human rights:

- United Nations Guiding Principles on Business and Human Rights
- IFC Performance Standard 2: Labor and Working Conditions
- ILO Declaration of Fundamental Principles and Rights at Work
- Universal Declaration of Human Rights

- OECD Guidelines for Multinational Enterprises

Söğüt İnşaat considers the risks of human rights violations that both its own personnel and those in the supply chain may be exposed to and takes the necessary care to prevent such risks. In case any risk arises from commercial activities for these persons, Söğüt İnşaat undertakes to make improvements by generating a reasonable solution as immediate as possible.

## **3. UNDERTAKINGS**

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### **3.1. Zero Tolerance Against Discrimination**

Söğüt İnşaat promotes a creative, culturally diverse, and collaborative work environment where all employees' rights are always respected. Procurement of a fair and respectful working environment for Söğüt İnşaat employees is an integral part of the Group's understanding of human rights. Söğüt İnşaat follows a zero tolerance policy against discrimination based on language, race, color, gender, political opinion, union membership, belief, age, physical disability, sexual orientation, military service status, etc. among employees or third parties.

### **3.2. Prevention of Violence and Harassment**

Söğüt İnşaat is committed to providing its employees with a workplace free from violence, Harassment, racism, bullying, or threats. It prefers to work with business partners who adopt similar standards. Furthermore, Söğüt İnşaat stands firmly against all forms of violence, considering domestic violence a workplace issue, and is committed to providing support mechanisms under its Domestic Violence Prevention Policy (SGT-GEN-POL-006).

### **3.3. Protection of Workforce**

Söğüt İnşaat does not tolerate any form of forced or compulsory labor and is strongly against slavery and human trafficking. Söğüt İnşaat strongly opposes child labour, protecting children's sacred right to education.

### **3.4. Protection of Sensitive Groups**

Söğüt İnşaat considers the special circumstances of vulnerable groups detailed in the United Nations Guiding Principles on Business and Human Rights. Söğüt İnşaat pays attention to ensure that migrant workers within its organization have the same conditions as non-immigrant workers engaging in similar business.

### **3.5. Social Gender Equality**

Ensuring gender equality within the Group is the responsibility of Söğüt İnşaat. Men and women are always of equal value, treated equally, and not discriminated against.

### **3.6. Appropriate Working Conditions**

Söğüt İnşaat complies with working hours, wages, overtime, compensation, and other fringe benefits in accordance with local regulations, ensuring a balanced business and private life. Appropriate performance evaluation systems are utilized to guarantee fair career progression.

### **3.7. Ensuring Employees' Health and Safety**

Söğüt İnşaat complies with applicable workplace safety and industrial hygiene standards required by law. Employees participate in Occupational Health and Safety (OHS) trainings and report potential dangers to workplace OHS departments.

### **3.8. Talent Management**

Söğüt İnşaat attaches importance to employing talented personnel and supporting their development, aiming for long-term employment of high-potential individuals.

### **3.9. Freedom of Association and Collective Bargaining Rights**

The right of Söğüt İnşaat employees to join trade unions and/or associations, organize, and bargain collectively without coercion or fear of retaliation is fully respected.

### **3.10. Participating in Political Activities**

Employees may voluntarily participate in political activities outside of working hours and make personal donations. Employees are required to conduct these activities outside of working hours and not use any Söğüt İnşaat resources (emails, computers, tools, etc.).

### **3.11. Staff Reduction**

Söğüt İnşaat considers alternative means before making mass dismissals. If an alternative way is not found, the process is carried out in accordance with applicable legal regulations and the principle of non-discrimination.

### **3.12. Protection of Confidentiality / Confidentiality of Professional Life**

Söğüt İnşaat undertakes to protect all confidential information, including personal data and trade

secrets, in accordance with local and foreign data protection authorities' practices.

## 4. REPORTING OF VIOLATIONS

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Each Employee and Third Party engaged in a business relationship with Söğüt İnşaat is required to immediately report any actual or suspected violation in compliance with this Policy through one of the channels identified below:

- **Email:** etik@sogut-insaat.com.tr
- **Web:** sogut-insaat.com.tr/ethics
- **Ethics Hotline:** 0312 287 33 13

Söğüt İnşaat takes all reports seriously. All reports received are kept confidential unless there is a legal obligation to disclose them.

Please refer to Söğüt İnşaat Whistleblowing Policy (SGT-KRY-POL-002) for details.

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**Ahmet KAPUSUZ**

Company Manager / Şirket Müdürü