

SABANCI HOLDING
HUMAN RIGHTS GUIDANCE

1. Scope and Purpose

The Human Rights Guidance (“the Guidance”) of Hacı Ömer Sabancı Holding Anonim Şirketi (“**Sabancı Holding**” or “**Company**”) provides guidance to the Company on the commitment to meeting responsibilities towards respecting human rights and standards in all activities.

Sabancı Holding embeds respecting, promoting and acting within human rights as a core responsibility. Furthermore, Sabancı Holding is committed to transparently disclosing its human rights impact, continuously improving our policies, and engaging with stakeholders to address concerns and uphold the highest standards.

The Guidance is binding for all Sabancı Holding employees regardless of the position. Sabancı Holding also ensures that all its Group Companies and Business Partners¹ to make reasonable efforts, as feasible, to comply with and/or align with the Guidance within the scope of their control.

Through the Guidance, Sabancı Holding aims to establish a fair, equitable, inclusive, safe, healthy, ethical, positive, and professional working environment that respects human rights across the entire organization and its affiliated entities.

2. Definitions

“Sabancı Holding” or “Company”: Hacı Ömer Sabancı Holding Anonim Şirketi.

“Sabancı Group Companies” or “Group Companies”: Sabancı Holding and all subsidiaries, joint ventures, and affiliates specified in its consolidated financial statements.

“Human Rights”: The basic rights and freedoms that belong to every person, as outlined in international frameworks such as the UN Guiding Principles, and ILO Core Conventions etc.

“The ILO”: The International Labour Organization.

“The ILO Declaration on Fundamental Principles and Rights at Work”: The ILO declaration adopted that commits all member to respect, and promote freedom of association, collective bargaining, elimination of all forms of forced or compulsory labor, abolition of child labor, elimination of discrimination in employment and occupation.

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

“The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct”: Guideline that provides state-sponsored recommendations for corporate responsibility, aiming to foster ethical and sustainable business practices. These guidelines support maintaining fair competition in the international market while promoting alignment with global goals such as climate change mitigation, biodiversity preservation, and respect for human rights. By encouraging due diligence and responsible use of technology, they enhance the contribution of multinational companies to sustainable development and societal well-being.

“The UN”: the United Nations.

“The UN Sustainable Development Goals (SDGs)”: SDGs are universal action call to reduce poverty, protect the planet and ensure that all people live in peace and prosperity. Besides other priorities, it includes new areas such as climate changes, economic inequalities, innovation, sustainable consumption, peace, and justice. Goals are interrelated; the key to success for any goal is to deal with problems that have common aspects in together.

¹ This includes suppliers and third parties with whom the company has a business relationship, as well as any representatives, subcontractors, or consultants acting on behalf of the company, and the employees and representatives of these parties.

“The UN Global Compact”: 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”: Set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations.

3. General Principles

Sabancı Holding references to the global ethical standards in the end-to-end life cycle of an employee and potential employees such as search, recruitment, career moves, development, performance, wages, benefits, diversity, equity and inclusion, and supports the rights of employees to form and join organizations of their choice.

Sabancı Holding commits to respecting the following internationally recognized principles and frameworks:

- The United Nations Guiding Principles on Business and Human Rights
- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises

Sabancı Holding may implement additional standards to address the needs of vulnerable groups that are more prone to negative human rights impacts and require special consideration. Sabancı Holding recognizes the specific circumstances of groups whose rights are further detailed in United Nations instruments, such as women, ethnic, religious, and linguistic minorities, children, persons with disabilities, and migrant workers and their families, as outlined in the UN Guiding Principles on Business and Human Rights.

Equal Opportunity and Zero Tolerance for Discrimination (Non-Discrimination)

Sabancı Holding shows zero-tolerance for discrimination based on language, race, sect, age, gender, culture, nationality, ethnicity, disability, neurodivergence, political and religious beliefs, sexual identity and gender expression or other protected characteristics, which it believes to be essential for building a culture of innovation and continuous development.

Discrimination includes any distinction, exclusion, or preference based on language, race, sect, age, gender, culture, nationality, ethnicity, disability, neurodivergence, political and religious beliefs, sexual identity, pregnancy or potential pregnancy, dependents, marital status, or marriage plans which impairs equality of opportunity or treatment in employment.

Zero Tolerance to Child/Forced Labour

Sabancı Holding has a commitment to the elimination of child labor and forced labor in all forms, across all aspects of its operations, supply chain, and partnerships. This commitment is guided by internationally recognized frameworks such as the ILO Core Conventions and the UN Guiding Principles on Business and Human Rights.

Anti-Harassment and Anti-Violence

Sabancı Holding is committed to fostering a workplace environment that is safe, respectful, and free from all forms of harassment and violence. The Company shows zero-tolerance against any behavior that undermines the dignity, well-being, or security of employees, contractors, or anyone engaged in its operations.

Human Trafficking

Sabancı Holding is committed to combating human trafficking and ensuring that all operations, supply chains, and partnerships are free from any involvement in such activities. The Company ensures international standards, including the United Nations Guiding Principles on Business and Human Rights and the ILO Protocol on Forced Labor, to prevent exploitation and promote human dignity.

Freedom of Association and Collective Bargaining

Sabancı Holding is committed to respecting and promoting the rights of employees to freedom of association and collective bargaining, as outlined in the International Labour Organization (ILO) Core Conventions and other international standards. These rights are recognized as essential for fostering equitable and productive workplaces.

Sabancı Holding:

- Respects the freedom of expression and opinion of all employees, in line with international human rights standards.
- Supports employees' right to unionize and collectively bargain in accordance with applicable laws, regulations, and international conventions.
- Prioritizes the creation of a workplace culture rooted in collaboration, inclusivity, and mutual respect.
- Commits to engaging in constructive, transparent, and good-faith dialogue with labour union representatives freely elected by employees.
- Aims to foster and maintain effective social dialogue and harmonious labour relations, promoting workplace peace and the well-being of all stakeholders.

Equal Remuneration, Working Hours and Compensation

Sabancı Holding is committed to ensuring equal remuneration for all employees, with the principles of fairness, equity, and non-discrimination in compensation practices.

The Company also ensures fair working hours and equitable compensation for all employees, fully complying with applicable national laws, international labour standards, and internal company policies. Wages are determined in a competitive manner, considering sectoral needs and local labour market dynamics, to ensure fairness and equity across all operations.

Sabancı Holding recognizes the importance of work-life balance and is committed to fostering a supportive work environment. The Company ensures that employees are not pressured to engage in work-related activities outside of contractual hours while also offering flexible working arrangements and remote work opportunities to meet diverse needs and enhance overall well-being. Employees who wish to learn more about the laws and regulations governing working conditions in their respective countries are encouraged to reach out to the designated officer or department in charge of compliance.

Employee Development

Sabancı Holding is committed to fostering a culture of continuous learning and development, ensuring that employees have access to necessary information and opportunities that enhance their skills, knowledge, and professional growth. By investing in employee development, the Company supports both individual aspirations and the collective success and future-readiness of the organization.

Sabancı Holding is dedicated to investing in reskilling and upskilling initiatives, equipping employees with the competencies needed to thrive in a rapidly evolving business landscape. By offering a diverse range of internal and external training programs tailored to sectoral needs and creating an ecosystem of continuous learning, the Company empowers its workforce to stay ahead of industry trends, adapt to emerging technologies, and embrace innovation.

Organizational Health and Safety

Sabancı Holding is committed to ensuring a safe, healthy, and secure workplace for all employees, contractors, and stakeholders involved in its operations. The Company ensures the highest standards of organizational health and safety, complying with all applicable national laws, international standards, and internal policies to proactively prevent workplace risks and promote well-being.

Data Privacy, Confidentiality, and Information Security

Sabancı Holding commits to data privacy, confidentiality, and information security by implementing measures to ensure compliance with all applicable laws and regulations across jurisdictions where it operates.

Responsible Marketing

As part of its Human Rights Guidance, Sabancı Holding adopts a responsible marketing approach that prioritizes transparent, fair, and ethical communication with all stakeholders. The Holding is committed to avoiding discriminatory or harmful stereotypes, ensuring accessibility for diverse audiences, and promoting its products and services in a way that supports sustainability and social well-being.

Commitment to Equity, Diversity, and Inclusion (DE&I)

Sabancı Holding is dedicated to fostering a workplace environment that promotes diversity, equality, and inclusion (DE&I) across all levels of the organization. To formalize its commitment and provide comprehensive guidance on DE&I-related topics, Sabancı Holding has established the **Sabancı Group Equality, Diversity, and Inclusion Regulation**. This regulation outlines the principles, practices, and expectations for creating an inclusive culture that values diversity and ensures equitable treatment for all employees. The full regulation can be accessed at [Sabancı Group Equality, Diversity, and Inclusion Regulation](#).

4. Human Rights Due Diligence Process

All processes related to Human Rights Due Diligence are outlined in detail in the [Sabancı Holding Human Rights Due Diligence Procedure](#). This Guidance should be read in conjunction with the Procedure, which serves as a guiding document for the implementation of due diligence practices across our operations.

5. Speak Up

Sabancı Holding encourages anyone who has been or is working for or with Sabancı Group, including employees, contractors, third parties, and business partners, to speak up about any actual or suspected wrongdoing or ethical misconduct that occurs at the workplace or within the scope of Sabancı Group's operations.

Employees have several options to raise their concerns and can choose the one that they feel most comfortable with. Comprehensive, independent and confidential reporting channels are put in place to this end.

Wrongdoings that can be reported include, but are not limited to the following:

- Criminal acts
- Health and safety issues
- Bullying and mobbing
- Harassment and discrimination
- Human rights abuses
- Falsifying documents
- Concealing wrongdoing
- Violations of Sabancı Group's internal policies

Speak Up Channels

Employees have several options to raise their concerns and can choose the one that they feel most comfortable with:

- A Designated Officer
- Senior Management
- Confidential Ethics Hotline (+90-212-385 85 85)

Designated Officers are:

- Ethics Board
- Employee Experience and Labour Relations Director

Reporting to the ethics hotline can be managed through etik@sabanci.com or confidential ethics hotline (+90-212-385 85 85). Whistleblowers' identities are kept anonymous. All ethics notifications are handled with utmost care in line with the Sabancı Group Code of Business Ethics.

Protection from retaliation

Sabancı Group ensures that the rights of employees who speak up are respected and not interfered with in any manner. No one will face any retaliation for reporting wrongdoing. Thus, all Employees are encouraged to report the actual or suspected ethical misconduct in good faith in a "fear-free" environment, which ensures that they will not be subject to any form of reprisals by Sabancı Group or other Employees.

Within this scope, Sabancı Group defines good faith reporting as describing and disclosing a situation with a sincere belief in its truth, having no intention to put others in a disadvantaged position or to gain a personal advantage.

Threats of retributions or retaliation against any Employee who reports an actual or suspected violations of the Human Rights Guidance and/or applicable laws and regulations will constitute a violation of the Guidance. Please also note that those who have actual knowledge but fail to report any actual violations of the Human Rights Guidance and/or applicable laws and regulations shall face disciplinary measures, including termination of employment. Please also note that having knowledge of but failing to report any actual violations of the Human Rights Guidance and/or applicable laws and regulations constitutes an ethical misconduct in itself which shall be subject to disciplinary measures, including termination of employment.

6. Multifaceted Approach on Protecting Human Rights

Sabancı Holding is dedicated to protecting and acting on human rights across all levels across its organization as well as its business operations. This understanding is implemented in other policies within the Holding and periodically re-analyzed for further monitoring and risk assessment.

Sabancı Holding takes on a multifaceted approach by integrating respect on human rights through its:

[Sabancı Group Responsible Investment Policy](#) to establish minimum standards for environmental, social, ethical, governance, and human rights considerations to guide capital allocation and investment decisions across the Group's value chain. This policy mandates the exclusion of sectors and activities that violate these principles, ensuring that all investments align with sustainable development goals and responsible business practices.

[Sabancı Holding Health and Safety Policy](#) to commit the protecting the health and safety of its employees and other stakeholders such as business partners, contractors or supply chain actors.

[Sabancı Group Equality, Diversity and Inclusion Regulation](#) to create a comprehensive framework established to promote a fair, equitable, and inclusive working environment across Sabancı Holding and its Group Companies.

In [Sabancı Group AI Policy](#), key ethical principles regarding the development and use of artificial intelligence are outlined. These documents emphasize the importance of respecting data privacy and security in AI's collection, processing, and use of personal data, ensuring that users are clearly informed about how their data is being used. Additionally, they highlight the need for AI algorithms to be transparent and auditable, ensuring that the workings of these systems are understandable and that accountability mechanisms are in place when necessary. The documents also stress that AI systems should be designed based on ethical principles and continuously monitored to ensure their decisions do not violate human rights.

[Sabancı Group Code of Business Ethics](#) to outline the core principles guiding the conduct of all employees within the Group. It emphasizes integrity, honesty, confidentiality, and the avoidance of conflicts of interest in all business processes and interactions. The Code delineates responsibilities towards various stakeholders, including customers, employees, shareholders, suppliers, business partners, competitors, and the broader community. The protection of human rights is a core guiding principle as per the Sabancı Group Code of Business Ethics.