

Our Human Capital Illuminating the Future through People

The **aurora borealis** is a phenomenon driven by energy and movement—just like Sabancı Holding's dynamic workforce. Our people are at the heart of transformation. We invest in continuous learning, leadership agility, and future-ready workforce programs to ensure that our people drive transformation through their expertise, collaboration, and entrepreneurial mindset. Just as auroras light up the sky, our talent lights the way forward.

149

Our Human Capital Strategy

160

Human Rights, Diversity, Equity and Inclusion

163

Occupational Health and Safety Management

Our Human Capital

Sabancı Group is shaping the future with the strength of its diverse, skilled, and future-ready workforce.

As of December 2024, Sabancı Group provides employment to over 60 thousand individuals worldwide, including subcontractor employees. With a strong commitment to global leadership, the Group continues to invest in its people—cultivating a culture of purpose and high performance that unites employees around shared goals. As enablers of transformation across all business areas, Sabancı Group employees play a central role in driving sustainable growth and long-term value creation.

Distribution of Workforce by Gender ✓

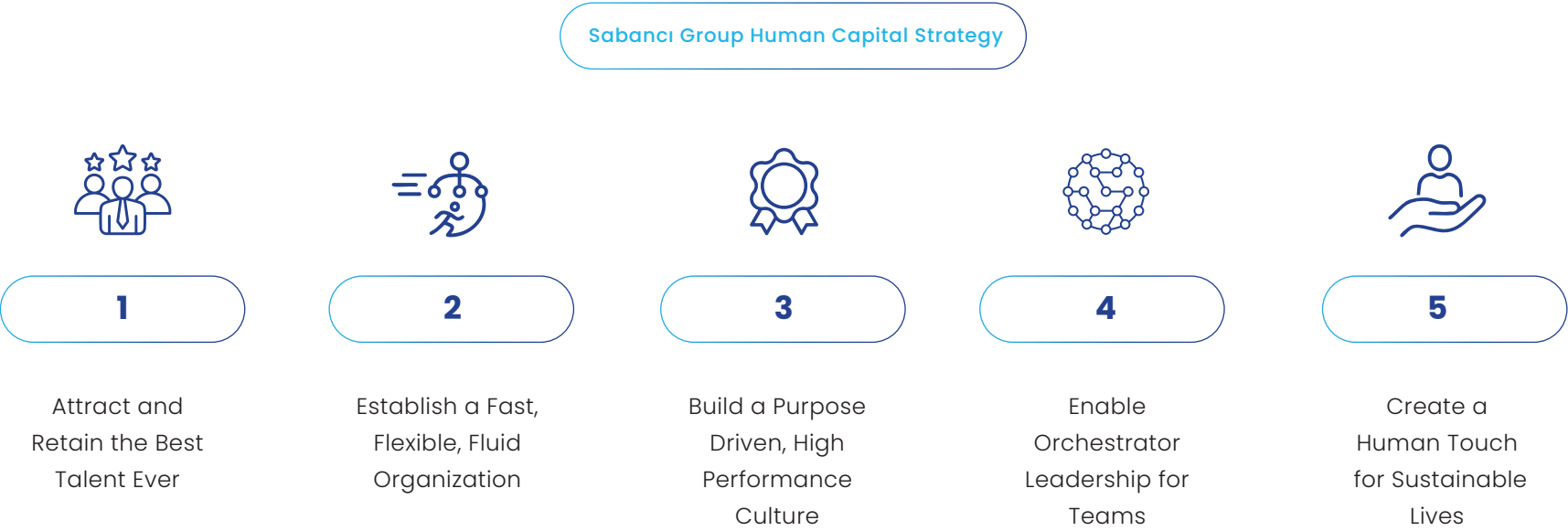


Distribution of Managerial Role by Gender ✓



Our Human Capital Strategy

Sabancı Group’s three-year human resources roadmap focuses on five key pillars to guide its human capital strategy. These pillars define how we attract, grow, and empower our people across the organization, reinforcing our leadership in sustainability, innovation, and purpose-driven transformation.



Our Human Capital Strategy

1. ATTRACT AND RETAIN THE BEST TALENT EVER

This pillar aims to attract and retain top-tier talent by aligning with global trends and implementing strategies that resonate with the needs and preferences of top talent.

Employer Branding and Cultural Transformation

In 2024, we moved beyond conventional employer branding and embraced a holistic transformation that made our values tangible across every employee touchpoint. To reinforce this shift, we launched the Employer Branding Project to strengthen the Sabancı employer brand among current and potential global employees.

Following research and analysis, the **Employer Value Proposition (EVP) “Starts with Sabancı”** was developed. The “Starts with Sabancı” initiative marked a new era, embedding the EVP in alignment with our purpose and core values: engagement, passion, authenticity, courage, and continuous growth. These values have become a lived experience, integrated into daily practices through recruitment campaigns, onboarding journeys, leadership communications, and social initiatives. A comprehensive activation process began in 2024 and will continue into the coming year.

“Starts with Sabancı” became more than an initiative, it evolved into a cultural movement. It united diverse talent segments under a shared purpose, reinforcing our values and mission. The initiative shaped internal culture, external perception, and leadership behavior. Looking ahead, we will expand its reach through digital engagement and real-time feedback to evolve the experience further.

Recognition as a Global Employer

Our efforts were globally recognized. **Sabancı Holding was ranked 405th on TIME’s “World’s Best Companies 2024” list as the top-ranked Turkish company, and was also featured in Forbes’ “World’s Best Employers 2024.”**

Purpose-driven Talent Ecosystem

We introduced differentiated hiring strategies for local and global talent. **The New Generation Career Experience Program** offered third- and fourth-year undergraduates a three-month opportunity to work on real business projects. In 2024, 24 students participated, with 50% women representation.

The SEED Digital Young Talent Program, redesigned to attract digitally savvy professionals with 0–3 years of experience, received 12,670 applications. Participants begin their upskilling journey in 2025, reflecting our

commitment to digital readiness, collaboration, and leadership development.

Beyond recruitment, we launched the **Sabancı Alumni Network**, an inclusive community for former interns, trainees, and early-career program participants. This network became a living ecosystem of brand ambassadors, potential rehires, collaborators, and innovation allies. In 2025, we plan to expand this platform to welcome the participation of all former employees.

By streamlining digital sourcing tools and strengthening our employer brand reach, we expanded our global talent pool. Through these efforts, we shifted from transactional hiring to building a purpose-connected talent ecosystem spanning the entire employee lifecycle.

Building Bridges for Collaboration and Innovation

In 2024, we strengthened our ecosystem approach to employee engagement and retention. We created new bridges between Group companies to promote shared learning, talent flow, and cross-functional collaboration. Through community-based platforms such as **Sabancı Minds**, **HR Minds**, and **Digital Minds**, we brought employees together to co-create experiences, exchange ideas, and build deeper social capital across the Group.

Our Human Capital Strategy

X-TEAMS, a business development platform utilizing agile methodology, aims to identify potential business areas aligned with the Group's strategies. Since the platform's launch, nine cohorts with approximately 500 employees consisting of cross-functional and cross-company teams have realized more than 60 projects.

To further energize our internal culture, we enhanced our intrapreneurship platform, **Sabancı ARF**. The program gave employees the opportunity to pitch new ideas, form agile teams, and receive funding or incubation support while remaining connected to the corporate backbone. By integrating ecosystem thinking, employee-led innovation, and purpose-driven engagement, we expanded the meaning of career mobility and created new pathways for long-term growth and impact within the Sabancı ecosystem.

2. ESTABLISH A FAST, FLEXIBLE, FLUID ORGANIZATION

Creating an agile and adaptable organizational structure that emphasizes speed, flexibility, and fluidity in companies to move Sabancı Group's strategy forward is the goal of this pillar.

Organizational Agility and Strategic Role Alignment

In 2024, through **the Critical Roles Project**, we defined "critical roles" using an objective framework aligned with our strategic priorities. This enabled more effective segmentation in compensation and talent management, while also supporting improved retention and succession planning efforts.

As part of the project, we clarified the role of the Holding in relation to our Group companies. While Sabancı Holding focused on strategic alignment, capability building, and ecosystem leadership at the core, our Group companies were empowered with increased autonomy and agility to lead within their respective industries.

Flexible Structures and a Future-Ready Workforce

We introduced digital tools and flexible work models to strengthen our resilience and adaptability across the workforce. Throughout the year, we continuously reviewed and recalibrated roles, teams, and organizational structures to ensure that the right capabilities were in the right places at the right time.

By adopting more dynamic work models, we empowered our employees to shape when, where, and how they work best. This reinforced a culture of trust, autonomy, and productivity.

Generative AI Upskilling and Innovation

In collaboration with Sabancı University, we launched a comprehensive **Generative AI Upskilling Program** for Data Scientists and Data Engineers across the Group.

The program combined technical expertise with a strong emphasis on ethical, real-world application of AI. Rather than offering standard technical training, we invited participants into a mindset of curiosity, co-creation, and strategic thinking to navigate uncertainty with confidence.

Participants gained the skills to design and deploy GenAI projects, fine-tune models for business-specific needs, optimize operations, and drive innovation from within.

In 2024, 19 employees successfully completed the program, delivering eight minimum viable products (MVPs) that addressed actual organizational challenges.

This hands-on, impact-oriented initiative reflects our commitment to building a future-ready workforce. Our objective is not only to enhance understanding of emerging technologies, but also to empower employees to shape and apply these tools to generate long-term, sustainable value.

Our Human Capital Strategy

Cross-Functional Mobility and Career Evolution

In 2024, we deepened cross-functional collaboration through structured talent reviews and flexible project assignments, guided by a strategic ecosystem mindset. Our aim was to move beyond static roles and hierarchies toward a more dynamic flow of talent where skills, impact, and potential take precedence.

We leveraged the diversity and scale of our Group companies to enable cross-company transitions and cross-industry mobility. Employees were encouraged to grow within their organizations and also explore new opportunities across the broader Sabancı landscape.

Through structured succession planning, we mapped talent with a long-term view, aligning individuals' potential with strategic workforce needs across the Group. As a result, we redefined career development from a linear path to a more adaptive and purpose-driven journey. Mobility became less about moving up and more about moving with purpose across roles, projects, and businesses.

3. BUILD A PURPOSE-DRIVEN, HIGH-PERFORMANCE CULTURE

The objective of this pillar is to foster a culture centered on purpose and high performance, motivating Sabancı Group employees to concentrate on an inspiring goal and collectively attain sustainable outcomes.

Shared Purpose and Cultural Mobilization

Our purpose, to unite Türkiye and the World for a sustainable life with leading enterprises, guided all strategies and was communicated across the Group through CEO Talks, Management Meetings, and employee engagements.

As part of the Sabancı Youth Mobilization, we participated in the Istanbul Marathon with over 1,000 employees under the slogan "It's Worth Running," standing out as a top conglomerate in charity donations. The 15th Golden Collar Awards recognized outstanding projects in the categories of "Digitalization and Continuous Improvement", "Innovation", "Scalable Customer Experience", "Sustainability" and "Sabancı of New Generation".

Empowering Human Capital

At Sabancı Group, the development of human capital is a cornerstone of our organizational strategy. We are committed to fostering a culture of continuous learning and professional growth that empowers our employees to reach their full potential. In 2024, we significantly invested in training and development programs, reflecting our dedication to enhancing the skills and capabilities of our workforce. Through comprehensive training initiatives and a robust career management framework, we aim to nurture talent, reward high performance, and ensure that every employee, regardless of their role or status, has opportunities for growth and advancement within the Group.

Encouraging the career development of employees, developing existing talents, and increasing employee loyalty by rewarding high performance are essential parts of our talent and career management approach. In this context, we support employees in their career journeys through career management processes and facilitate their involvement in different areas or higher positions within the Group. We focus on the development of all employees in the Group, regardless of company, unit, and blue-collar, white-collar or subcontractor status.

Our Human Capital Strategy

1.7 million hours

Training Provided to Employees

32 hours

Average Training per Employee

TL 408 million

Total Training Investments

5,713 hours

Diversity and Inclusion Training

88,304 hours

Training Provided for Sub-contractors⁶⁰

45,490 hours

Sustainability and Environment Training

35,593 hours

Anti-bribery and Corruption Training

15,844 hours

Ethics Training



A Future-Oriented Learning and Development Strategy

In 2024, following “Starts with Sabancı” initiative, we introduced a future-oriented learning and development strategy designed to foster an inclusive, enriching, and sustainable learning culture. It reflects our aspiration to be a learning and teaching organization, where knowledge is acquired, shared, and built upon collectively.

From onboarding to alumni engagement, every stage of the employee lifecycle is designed to build emotional connection and consistency.

- The strategy also focuses on:
- Designing sustainable programs built around learning from each other and self-directed development
 - Enriching the community’s learning experiences through interactive and innovative formats
 - Ensuring the effective communication of all learning and development opportunities; both within the organization and externally

Through this approach, we empower individuals to grow with purpose, take initiative, support one another, and create sustainable impact, today and for the future.

59 OHS trainings are not included.
60 Includes Brisa, Kordsa and Enerjisa Üretim.

Our Human Capital Strategy

A Purpose-Based Performance Culture

A transparent, agile, and collaborative performance system based on Objective Key Results (OKRs) and Key Performance Indicators (KPIs) ensures regular feedback and employee development. In 2024, 100% of Group employees received performance evaluations. Beyond metrics, we placed strong emphasis on career conversations and goal-setting dialogues between employees and leaders to create meaningful moments for alignment, reflection, and aspiration. The performance process expanded to include continuous check-ins, developmental feedback sessions, and structured tools for tracking progress and recognizing contributions. With these practices, we shifted from evaluation to empowerment, ensuring that every employee has a voice, a direction, and a path to grow within a purpose-based performance culture.

Internal Mobility and Career Opportunities

We continued the announcement, application, and nomination processes through the Sabancı Career Portal. We created opportunities for our employees to gain experience across different companies, industries, and roles. In 2024, 77% of positions opened within the Group were filled by internal candidates, while a total of 11,964 new employees joined the Group.

Remuneration – A Total Rewards Approach

In addition to performance management, we provide various benefits, recognition, appreciation, and supportive practices that reflect peer group and market practices. Base salary is determined by role size, scope, criticality, required skills, level of responsibility, and professional experience, and is reviewed annually. Each Sabancı Group company offers side benefit schemes with varying content and flexibility, tailored to role status and individual expectations.

Remuneration – A Total Reward Model



Our Human Capital Strategy

Incentive Plans Linked to Sustainable Value Creation

We offer both Short-Term Incentive (STI) and Long-Term Incentive (LTI) plans to align performance with strategic goals and drive sustainable value creation. Our STI program enables employees to focus on achieving key financial and non-financial objectives. The LTI program is designed for a defined group of senior executives, encouraging long-term value creation, strengthening alignment with shareholder interests, and rewarding sustained performance and stability.

Each year, the Board of Directors reviews and defines long-term KPIs for the senior management team. The long-term bonus system covers a consecutive three-year performance period, with the bonus paid at the end of the relevant cycle. A Malus and Clawback framework is defined for both short- and long-term incentive systems and is applied to all Executive Committee members (Holding CEO, Group Presidents, SBU Presidents) and Group company CEOs who benefit from the bonus system.

KPIs for variable remuneration in 2024 are as follows:

Short Term (1-Year) Financial KPIs⁶¹

- Net Sales
- EBITDA
- Free / Operational Cash Flow
- Net Financial Debt
- Working Capital
- Market Share
- Market Cap Growth
- Net Profit

Short Term (1-Year) Non-Financial KPIs⁶¹

- Action against the climate crisis
- Improvement in ESG Indices Scores
- Diversity and Inclusion
- Operational Excellence

Long Term (3-Year) KPIs

- r-TSR (Relative Total Shareholder Return) above peers⁶²
- Net Asset Value Growth
- Free Cash Flow⁶³
- Equity Growth⁶³

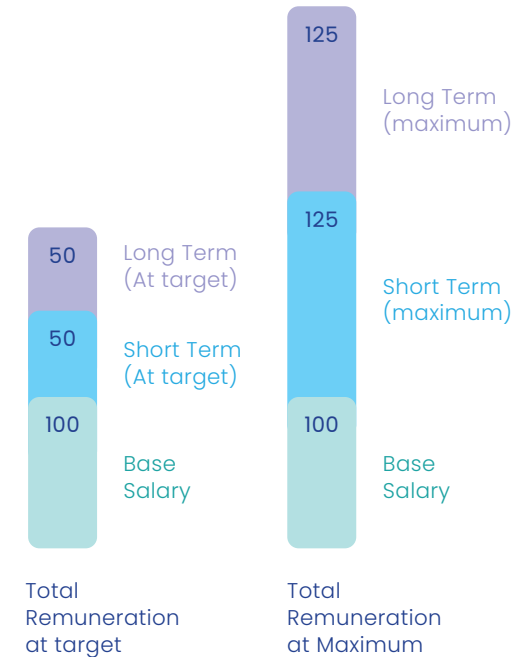
Pricing ability,
competitive
position and
operational
excellence



Capital
distribution
and value
creation



Total Cash Distribution Model (%)⁶⁴



⁶¹ Short-term KPIs are not limited to those included on this page; those shown are merely examples.

⁶² Change in market capitalization compared to peers for listed companies.

⁶³ For non-listed companies.

⁶⁴ Sample for a company general manager. These rates are for illustrative purposes only and demonstrate the change in earnings based on target versus maximum performance.

Our Human Capital Strategy

Resilience Through Competitive Compensation

In 2024, the Group implemented an interim salary increase to maintain competitive employee welfare in response to macroeconomic data and market conditions.

Sabancı also ensured fairness by applying structured pay benchmarking across Group companies. Our compensation strategies emphasize both internal equity and market competitiveness while offering tailored benefits that meet the diverse needs of employees across all life stages.

Ensuring Equal Pay Through Gender Equity in Compensation

Gender equality is one of the key criteria to define Sabancı Group's remuneration model.

In our Group, men and women receive equal pay with a female-to-male pay ratio of 1.0.

Sabancı Group does not tolerate raw gender pay gaps and annually monitors equal pay for equal work across all employee levels. If disparities are found, companies must implement corrective roadmaps within two years, including potential salary adjustments.

4. ENABLE ORCHESTRATOR LEADERSHIP FOR TEAMS

Cultivating leaders in line with the Sabancı Leadership Model, and skillfully orchestrating teams and all stakeholders are the objective of this pillar.

Leadership Model Transformation

In 2024, we renewed the **Sabancı Leadership Model** through a collective and participatory process.

The new model focuses on building future-ready leaders who act as ecosystem orchestrators, drive growth, enable transformation, and strengthen connections across the organization.

This shift redefined leadership beyond managing teams, placing greater emphasis on collaboration, innovation, and ecosystem thinking. Succession planning and leadership assessments were updated to reflect this evolving vision and ensure alignment with the Group's long-term strategy.

Executive Learning

In 2024, we designed **Generative AI Leadership Programs** to build both technical understanding and strategic thinking around how AI can reshape industries, teams, and decision-making. A tailored GenAI training catalog was created to allow leaders to shape their own learning journeys based on individual needs.

We also launched two new cross-functional communities: **"Sabancı Minds"** and **"Digital Minds"**, composed of digitally curious and transformation-oriented leaders. These groups served as learning accelerators and innovation incubators, embedding GenAI thinking into our business strategy and people leadership model. This convergence of AI and human development positioned our leaders to navigate change and orchestrate it with insight, empathy, and impact.

Our Human Capital Strategy

Leadership Development Programs

TP-X

Supports high-potential individuals new to their business careers and the Group.

 1.5 years  25

X-POSURE

Improves the leadership potential of Sabancı Group mid level managers.

 1.5 years  23

PROGRAM FOR TP-X GRADUATES

Empowers TP-X graduates through leadership development certificate programs for top global universities.

 1.5 years  7

PROGRAM FOR X-POSURE GRADUATES

Empowers X-POSURE graduates through Columbia Business School's Executive Program in Management.

 1.5 years  5

SABANCI TRANSFORMATION TEAM (SATT) PROGRAM

Sabancı Holding Executive Board Members and Company General Managers drive the Group's transformation. The 2024 SATT Meetings, including an away day in London from Oct 8-11 themed "Creating Value," fostered an investor mindset and explored key growth drivers through immersive experiences.global universities.

 4 times a year  32

HR JOURNEY

Supports Group HR leaders by incorporating global perspectives and methods to prepare them for a future-ready ecosystem.

 1 year  24

X-CELERATE

Supports CXO leaders' transformation and deepens their global leadership perspective.

 1.5 years  2 cohorts of 22 each

SABANCI MINDS

Sabancı Group Top Management meet to discuss leadership approaches to drive impact in a rapidly changing world.

 Once a year  ~200

 Duration

 Number of Participants

Our Human Capital Strategy

5. CREATE A HUMAN TOUCH FOR SUSTAINABLE LIVES

This pillar aims to instill a human-centric approach to promote sustainable lifestyles, fostering connections that prioritize personal touchpoints and continuous learning for general well-being and vitality.

A Purpose-Aligned Employee Experience

In 2024, we continued to strengthen our people-first culture through a comprehensive, human-centric approach to employee well-being, engagement, inclusion, and sustainability.

Employee engagement and satisfaction are key priorities for Sabancı Group. Understanding that a thriving workforce drives long-term success, we maintain a data-driven approach to listening, measuring, and enhancing employee experience. By treating employee experience as the foundation of engagement, we reinforce a workplace culture where people felt heard, valued, and empowered to contribute meaningfully.

The most recent Engagement Survey, conducted in 2024, provided valuable insights into employee sentiment, workplace culture, and areas for improvement. Survey

results were not just collected they were actively analyzed and transformed into action plans, which were systematically monitored and refined. Employees were kept informed about engagement results, planned interventions, and leadership commitments to building a more connected, engaged workforce.

We remain committed to measuring progress, acting on feedback, and continuously evolving to ensure a high-performing, human-centered workplace.

The Sustainability Academy

We launched the Sustainability Academy in 2024 to provide employees with in-depth, structured sustainability training aimed at fostering a mindset shift toward environmental and social impact, governance awareness, and sustainable leadership.

The launch of the Academy marked a significant milestone in our journey to embed ESG competencies across Sabancı Group. More than just a training initiative, it serves as a foundational platform for cultivating a sustainability mindset. By ensuring that environmental, social, and governance principles become integral to how every employee thinks, decides, and leads, the Academy strengthens our commitment to long-term, sustainable impact.

Sabancı Life and Workplace Well-Being

To further promote sustainable and meaningful lifestyles, we launched “**Sabancı Life**”, a corporate loyalty platform that provided more than 21,500 employees with access to 42 exclusive benefits across areas such as shopping, education, and wellness. This initiative deepened our people’s sense of belonging and recognition across the organization.

Our well-being strategy expanded in 2024 to include enhanced mental health resources, flexible work models, and improved work-life integration policies. These programs addressed the full spectrum of employee needs, from emotional resilience to ergonomic safety, ensuring that everyone feels seen, safe, and supported.

Occupational Health and Safety First

Our employee health and safety practices remained fully aligned with relevant legislation, Group standards, and global best practices. We proactively assessed and mitigated risk through training, dialogue, and continuous monitoring. Through our “Occupational Health and Safety First” commitment, we reinforced our belief that our people are our greatest asset. Our responsibility for compliance and excellence extended to our workforce and all stakeholders.

Our Human Capital Strategy

Human-Centered Policies

Our HR policies are grounded in fairness, inclusivity, and transparency. In 2024, we continued to strengthen our human-centered culture by prioritizing clear communication, inclusive benefits, and development opportunities tailored to the diverse needs of our workforce.

All Group companies received regular, data-driven updates on potential industrial relations and labor law risks to enable proactive management. Legally compliant flexible working models were implemented to support evolving ways of working.

Employees' rights to organize and engage in collective bargaining were fully respected. We maintained neutrality in all union-related matters. Constructive collaboration with labor and employer unions ensured continued labor peace. 85% of Sabancı Group blue-collar employees are affiliated with a union.

As the leader of TÜSİAD's Employment and Social Security Working Group, we contributed to shaping public policy on labor law compliance, employment incentives, secure flexible work arrangements, and the future of jobs.

We actively participated in TÜSİAD's opinion-forming processes and supported research initiatives on Türkiye's evolving labor agenda.

Embedding ESG into the Employee Experience

In 2024, we took significant steps to embed ESG principles more deeply into our workforce strategy. Flexible working models were supported by enhanced parental leave, expanded health insurance, and inclusive benefit structures to serve employees across all life stages.

We remain committed to equitable and inclusive practices at every level of our organization. Our hiring and promotion processes were intentionally designed to reduce bias and strengthen gender equity, especially in STEM and revenue-generating roles. Gender representation continued to be tracked and transparently monitored across all levels of the organization, reinforcing our long-term commitment to equality and diversity.

Human Rights, Diversity, Equity and Inclusion

With a workforce of over 60 thousand employees globally, including subcontractors, Sabancı Group is committed to becoming a global leader by harnessing the power of its diverse and talented human capital. Our vision is grounded in a strong respect for human rights and equal opportunity, which empowers us to build a more inclusive and resilient future with confidence.

As part of our Responsible Investment Policy and Equality, Diversity and Inclusion Regulation, we have established clear governance tools that articulate our overarching approach and firm stance on responsible conduct across our investments, human rights practices, and DEI initiatives.

At Sabancı Group, we believe that a diverse workforce encompassing different perspectives, backgrounds, and experiences and strengthens our culture, drives innovation, and supports sustainable growth. DEI is not a statement of intent, but an embedded principle within our policies and daily practices. We are dedicated to cultivating a workplace where every individual is valued, respected, and empowered regardless of race, gender, ethnicity, sexual orientation, disability, or other dimensions of identity.

We implement targeted programs such as unconscious bias training, inclusive hiring and promotion practices, employee resource groups, and mentorship initiatives to actively promote an inclusive and supportive environment.

In 2024, we delivered gender equality training to all employees, covering core topics such as gender norms, stereotypes, discrimination, sexual harassment, inclusive language, and unconscious bias.

We also recognize that inclusion starts at the top. As part of our commitment to DEI, Sabancı Holding has adopted a [Diversity Policy for the Board of Directors](#). This policy promotes the inclusion of professionals from diverse backgrounds, experiences, and qualifications in the nomination process to strengthen Board effectiveness and improve corporate performance. We prioritize diversity in terms of age, nationality, gender identity, ethnicity, language, disability, cultural background, and professional experience. As of 31 December 2024, women represent 44% of Sabancı Holding’s Board of Directors, including the Chair—well above our target of maintaining at least 30% female representation.

Our DEI commitments also extend to everyday practices. We promote active engagement in caregiving responsibilities for all employees, regardless of gender, and support women in their return to the workplace after maternity leave. These efforts reflect our belief that an inclusive workplace is not only the right thing to do but also essential for sustainable value creation in a complex and interconnected world.

Maternity / Parental Leave (2024)

	Women	Men
Employees granted maternity/parental leave	892 ✓	1,658 ✓
Employees who returned to work following maternity/parental leave	873 ✓	1,650

Human Rights, Diversity, Equity and Inclusion

At Sabancı Group, 31% of our employees and 44% of our managers are women. We are continuously working to improve these figures and ensure equal opportunities for all.

We commit to increase the women leaders to 50% by 2030, meaning a 32% increase compared to 2020 figures, which was already aligned with the EU average.

We commit to increase the number of women in both STEM and revenue-generating roles to 50% by 2030.

Share of Women Employees in STEM
and Revenue Generating Roles

33% ✓

STEM Roles⁶⁵

45% ✓

Revenue Generating
Manager Roles⁶⁶

⁶⁵ Science, technology, engineering, and math

⁶⁶ Revenue-generating jobs refer to ones that when vacant, no revenue is generated.

Sabancı Group is pioneering to promote women representation and empowerment in the society through initiatives that are mentioned below:

Women's Empowerment Principles

Sabancı Holding, Akbank, Akçansa, Aksigorta, Brisa, Carrefoursa, Çimsa, Enerjisa Enerji, Enerjisa Üretim, Kordsa and Teknosa are the signatories of the Women's Empowerment Principles (WEPs) Platform established in partnership with the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) and the United Nations Global Compact (UNGC). They support gender equality in the business world and the economic empowerment of women employees. Sabancı Holding has been the first Turkish company to sign the United Nations Women's Empowerment Principles Declaration in 2011. By signing the Women's Empowerment Declaration, Sabancı Holding has declared that it adopts and supports the approach of women-men equality at works and has led the way for many companies in this field.

Declaration Of Principles On Equality At Work

The 'Equality at Work Platform' was established under the auspices of the Ministry of Family and Social Policies to close the wide gender chasm in labor force participation in Türkiye as part of the task group established under the World Economic Forum (WEF) to combat gender-based inequality. The platform continues its efforts with

the goals of increasing women's participation in the workforce, involving them more actively in decision-making mechanisms, and having them benefit from equal opportunities and resources. There are 11 articles in the declaration of commitment issued by the Platform.

Young Women Building Their Future

Sabancı Group harnesses the power of its industrial and business activities to support a wide range of social and cultural efforts through the Sabancı Foundation. The Foundation supports young women who are not in employment, education or training (NEET - Not in Education, Employment, or Training) through 'Young Women Building Their Future' project. The project aims to make the problems and needs of the NEET women visible and establish mechanisms to address these problems and needs. The project will also increase the social and economic participation of the NEET women by empowering them.

30% Club

Sabancı Holding has active membership for 30% Club Türkiye. The 30% Club plays a significant role in advancing the cause of gender equality and fostering positive changes in business environment by promoting women's empowerment and advocating for increased gender diversity at all senior decision-making levels across Türkiye, including Boards and C-Suite.

Human Rights, Diversity, Equity and Inclusion

HUMAN RIGHTS

At Sabancı Group, we are committed to promoting human rights across our operations and value chain. We support and respect international standards and ensure compliance through our Responsible Investment Policy, Sabancı Group Code of Business Ethics, and other internal regulations.

The Due Diligence Process within the scope of Responsible Investment Policy's Investment section refers to the analysis carried out to determine the compliance of the Group companies' prioritized areas of value chains.

Within this context, some activities defined in the Policy are prohibited due to violations of local and international legislation, particularly those related to environmental protection, occupational health and safety, and human rights.

This includes employing workers below the legal minimum wage, obstructing unionization, violating principles of equal and fair treatment, and employing child labor or engaging in forced labor and human trafficking. Activities leading to the displacement or rights violations of vulnerable and indigenous populations without consent are banned, as are those involving abuse, fraud, bribery, and corruption.

In 2024, several Sabancı Group companies significantly advanced their **human rights due diligence processes**, aligning their efforts with international standards such as **the UN Guiding Principles on Business and Human Rights, ILO Conventions, and OECD Guidelines**.

Enerjisa Üretim led a structured approach by revising its Human Rights Policy and establishing a Corporate Human Rights Management System, which includes Human Rights Standards Operational Procedures. The company initiated a **Human Rights Due Diligence (HRDD) process** through a cross-functional task force involving departments such as Sustainability, Legal and Compliance, Human and Culture, Internal Audit, and Procurement. A **human rights risk inventory** was developed and is being integrated into the corporate risk management system, while relevant policies are being aligned to ensure full compatibility with due diligence requirements. Enhanced mechanisms to address GBVH (Gender-Based Violence and Harassment) were also introduced.

Çimsa formed a **Human Rights Sub-Working Group** under its Positive Impact Focus Group to assess human rights risks across its value chain. The group, coordinated by the Sustainability, OHS, and Environmental Directorate, includes representatives from HR, Risk and Internal Control, Compliance, OHS, and Supply Chain, with oversight by Internal Audit. Its findings are reported to

the Sustainability Management Committee, supporting integration of human rights into core business processes.

Temsa took steps to formalize human rights due diligence in the supply chain through supplier DEI compliance mechanisms and committed to expanding ESG audits to integrate HRDD criteria more systematically.

Across the Group, we continue to strengthen the foundation of our human rights approach by formalizing governance structures, aligning policies with international standards, and deepening operational integration. We are advancing our efforts through the **establishment of cross-functional working groups, enhanced grievance and case management systems, and the systematic integration of human rights criteria into supplier engagement and enterprise risk management processes.**

These steps mark a **strategic shift from commitment to execution**, as we work to embed human rights due diligence across all operations and value chains with greater transparency, accountability, and cross-company alignment.



For further details regarding Human Rights and Due Diligence Process please refer to Human Rights section within our [Responsible Investment Policy](#) and [Sabancı Group Code of Business Ethics](#).

Occupational Health and Safety Management

Embracing the principle of 'Occupational Health and Safety First,' we emphasize the importance of employee wellbeing.

This commitment to excellence is reflected in both the Group's workforce and stakeholders. With this understanding, we ensure compliance with relevant legislation and internal standards for employee health and safety.

We are committed to continually enhancing and standardizing employee health and safety practices through comprehensive training and knowledge transfer. In all our operations, we comply with relevant legal and regulatory requirements while also proactively integrating global trends and best practices in Occupational Health and Safety (OHS).

We recognize the importance of employee consultation and participation in shaping our OHS policies. To strengthen this, we continue to improve how we communicate the impact of employee feedback on our health and safety decisions.

We conduct thorough risk and hazard assessments across all operations to ensure a safe working environment. While these assessments and resulting action plans are part of our internal processes, we recognize the need to improve transparency in public reporting. Moving forward, we aim to share how our prioritized action plans are aligned with measurable targets to reduce OHS risks, and how we track progress against these targets.

We also acknowledge the importance of clear, publicly communicated emergency preparedness strategies. These are essential to foster stakeholder trust and collective readiness. Similarly, we are working to enhance transparency in evaluating OHS performance against set targets, recognizing its importance for continuous improvement and accountability.

We are deepening our efforts to share the outcomes of internal inspections and investigations related to work-related incidents. This commitment supports a culture of trust, openness, and shared learning.

We also recognize that embedding OHS criteria into procurement and contractual processes is essential for a holistic OHS strategy. We are developing more robust mechanisms to report on this integration across our value chain.

Many of our Group companies have achieved ISO 45001 Occupational Health and Safety Management System certification, demonstrating our robust approach to occupational health and safety. While certification is an important step, we are also focused on enhancing the public visibility of our ongoing OHS efforts.

In 2024, we provided a total of **492 thousand hours of OHS training⁶⁷** to employees and subcontractors. These efforts reflect our commitment to building a zero-accident culture across all operations.

We operate with a clear goal of achieving zero accidents across the Group. In 2024, there were **2,083 accidents** recorded across our companies. The **Lost Days Rate (LDR)** stood at **7.88%**, and the number of occupational diseases reported was 9. Our **absentee rate** was **0.28** across the Group.

At Sabancı Group, we view employee health and safety as a shared responsibility and a cornerstone of sustainable business performance. We continuously monitor and adopt new practices, evaluate risks, and act with foresight to build safer, healthier workplaces for all.

[For the Sabancı Group facilities certified with ISO 45001, please read the ISO Certifications document available at the Download Center section of the Report's website.](#)



⁶⁷ Includes group employees and subcontractors.