

Kontrolmatik Teknoloji Enerji ve Mühendislik A.Ş. HUMAN RIGHTS POLICY

GENERAL PROVISIONS

With its efficiency and sustainability oriented approach, Kontrolmatik operates in different geographies. For its employees in the countries it operates and all stakeholders it collaborates with, it adopts an approach that respects human rights and aims to observe basic human rights throughout society. As a signatory of the United Nations Global Compact, it oversees compliance with the Contract Principles. In this context, Kontrolmatik has created the Human Rights Policy (Policy).

- ♣ The Policy is based on the Universal Declaration of Human Rights and the Conventions of the International Labor Organization (ILO), the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.
- ♣ The policy covers the business partners, suppliers and especially the employees. Kontrolmatik communicates the rules specified in the Policy to its employees in annual trainings. In order to encourage its employees, business partners and suppliers to be in compliance with the principles specified in this Policy, these parties are informed of the Policy and included in agreements.
- ♣ Kontrolmatik Technology will terminate its business relations if any of its suppliers or partners do not attach importance to Human Rights practices and no action is taken on this issue.

Principles, Commitments and Related Practices

Within the scope of the policy, Kontrolmatik:

Respect to Human Rights

Respects universal human rights and aims to prevent violations of human rights in line with the Universal Declaration of Human Rights in the countries where it operates in. In addition to this, respects the rights of the local communities in the countries where it operates by referring to the United Nations Declaration of the Rights of Indigenous Peoples.

Equal Opportunities, Respect to Differences and Diversity

In processes regarding human resources such as remuneration, recruitment, personal and professional development and in the working environment, it demonstrates an equal attitude among its employees without discrimination based on gender, language, religion, race, ethnical origin, sexual orientation, nationality, age, pregnancy, marital status, union membership, political opinion and similar issues, and shows no tolerance toward discrimination in these matters. Conducting its approach toward employees in line with the principle of the right person for the right job, it manages the processes transparently based on the qualifications, experience and performance of its employees. Respects diversity as an important element of the organizational structure.

Freedom of Expression

Considers the prevention of all kinds of instances that may hinder employees' right to freedom of expression in the business environment as a principle.

Healthy and Safe Working

Regards providing the conditions and work environment where all employees can work safely and happily as a priority and act in line with the goal of "zero accidents" in all its activities. Pursues full compliance with the international principles and national laws and legislation regarding OHS and undertakes to provide good practices that exceed legal obligations.

Preventing Ill Treatment

Treatment, intimidation and harassment in the working environment are not tolerated.

Forced Labor and Human Trafficking

Strictly prohibits forced labor and human trafficking.

Child Labor

In accordance with the principle of not employing child labor specified in the ILO Declaration on Fundamental Principles and Rights at Work, child labor is prohibited.

Criminal Acts

Does not engage in any action that may result in a crime or violation of rights in the countries where it operates in. Also expects its employees to be sensitive in this regard.

Feedback from Stakeholders

Places emphasis on the feedback and opinions of stakeholders regarding the policy. Policy-related feedback and potential Policy violations and non-compliances are reported via ik@kontrolmatik.com.

Compliance, Monitoring, Audit and Reporting

- ♣ The General Manager and Deputy General Managers are responsible for the human rights policy.
- ♣ The Board of Directors of the company is responsible for the determination of reporting, review and sanction mechanisms in the event of violation of human rights policy, rules and regulations, and for the supervision of these mechanisms.
- ♣ Kontrolmatik identifies the potential human rights issues in its activities and the groups that will be most affected by these problems, and endeavors to reduce and prevent these effects in the event of a negative impact on human rights. In the event human rights are at risk, necessary precautions are taken by contacting authorities.
- 4 A system has been established for reporting the violations of the Policy in which the identity of the whistleblower will be kept confidential.

Resolution of Policy Non-Compliance

- Official and unofficial complaint mechanisms are developed to compensate for the rights violations made by Kontrolmatik within the scope of the policy.
- ♣ If deemed necessary by the General Manager, an expert opinion can be sought or experts can be used in the process by taking measures to prevent confidentiality principles from being violated during the investigation. During the investigation, all information and documents requested by the General Manager are submitted to this board. All employees are obliged to assist the General Manager in this regard.

No retaliation can be made against any employee who reports his/her concerns within the scope of the policy, and reports are handled through processes that ensure confidentiality. Failure to comply with this Policy may result in disciplinary or criminal action.