

<div>MARTURFOMPAK</div> <div>INTERNATIONAL</div>	<div>HUMAN RIGHTS POLICY</div>	Issued Date / Hazırlık Tarihi:	1.5.2007
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1. OVERVIEW, PURPOSE AND SCOPE

We, Martur Fompak International, believe that business can only flourish in societies where human rights are protected and respected. In recognition of our responsibility to respect human rights, we have developed this Human Rights Policy (‘this Policy’). This Policy supports the creation of a sustainable work environment that respects human rights and guides us in preventing any direct or indirect human rights violations, consistent with our other company policies and practices.

Accordingly, all employees—including directors, Executive Committee members, and Board members—and all Business Partners (customers, suppliers, contractors, consultants, and others) are expected to comply with and adhere to this Policy in all their business activities. If local laws provide less protection than international human rights standards, we apply the standards set out in this Policy.

2. DEFINITIONS

**UDHR** (Universal Declaration of Human Rights) is a foundational United Nations document that outlines basic human rights and freedoms. It guides our commitment to treat all individuals with dignity and respect.

**UNGPs** (United Nations Guiding Principles on Human Rights) is a global framework that defines the corporate responsibility to respect human rights. It directs how we identify, prevent, and address human rights impacts throughout our operations and value chain.

**ILO** (The International Labor Organization) **Declaration on Fundamental Principles and Rights at Work** is an international standard that sets essential labor rights including freedom of association, fair treatment, non-discrimination, and the elimination of child and forced labor.

**UNGC** (The United Nations Global Compact) is a voluntary business initiative that promotes responsible corporate behavior. As a supporter, we align our operations with its Ten Principles on human rights, labor, environment, and anti-corruption.

3. GENERAL PRINCIPLES

We embrace our responsibility to respect internationally recognized human rights and foster respect for human rights in relationships with our business partners along the value chain. We uphold the fundamental belief that every individual deserves to work in an environment where their dignity, rights, and freedoms are respected and protected. Our Human Rights Policy is grounded in internationally recognized standards, including the UDHR, the UNGPs, the UNGC Principles, and the ILO Declaration on Fundamental Principles and Rights at Work. We apply these principles consistently across all our operations and expect the same from our business partners. We treat all employees fairly, promote equal opportunities, and prohibit any form of discrimination, harassment, exploitation, or abuse. We are committed to maintaining a safe, healthy, and inclusive workplace where people can develop their potential, express their concerns without fear of retaliation, and participate in legitimate labor relations. Our approach is based on responsibility, transparency, due diligence, and continuous improvement.

4. COMMITMENTS

4.1. Safe, Fair and Inclusive Workplace

We are committed to fostering a safe, fair, and inclusive workplace for all employees. This includes maintaining a work environment grounded in ethical standards, where every individual is heard, respected, and equipped with the tools needed to succeed. We uphold equal treatment, promote diversity and gender equality, and strive to build a culture where everyone feels a sense of belonging. We take proactive steps to prevent harassment, discrimination, bias, and any form of exclusion. Our goal is to empower every employee to contribute meaningfully and to thrive in a workplace built on dignity, fairness, and inclusion.

4.2. Zero Tolerance to Child & Young Labor

We strictly prohibit the employment of individuals under the age of 18 in all our operations. In cases where local regulations allow employment below this age, our internal standard prevails, and the stricter requirement supersedes local law.

Although we do not employ individuals under 18 in regular positions, we may engage young persons through legitimate internship or apprenticeship programs for educational purposes. Such programs must meet legal requirements and our internal standards, ensuring close supervision, protection from hazardous work, and no disruption to compulsory schooling. Where required, parental consent is obtained. All young participants are covered by the same safety and dignity protections as every worker. We expect the same commitment from our business partners and apply responsible sourcing practices to ensure that our supply chain upholds these principles without exception.

#### **4.3. Zero Tolerance to Forced Labor, Modern Slavery & Human Trafficking**

We maintain a zero-tolerance approach to forced labor, modern slavery, and human trafficking in all forms. Employment at our company is fully voluntary, and employees have the freedom to leave their employment in accordance with local laws and contractual terms. We do not tolerate practices such as involuntary work, debt bondage, retention of identity documents, restriction of movement, or any form of coercion or intimidation. We strictly prohibit any practices that exploit or coerce individuals, and we require our business partners to uphold the same standards.

#### **4.4. Ethical Recruitment and Hiring**

We are firmly committed to ethical recruitment practices, recognizing that our people are the foundation of a successful and sustainable organization. Our approach begins with creating clear and unbiased job descriptions that accurately reflect the qualifications and requirements for each role, ensuring equal opportunities for all candidates. We actively seek to attract a diverse pool of talent and strive to maintain fairness and objectivity throughout the selection process. Every applicant is evaluated solely on their skills, experience, and potential to contribute to our company's success—never on personal characteristics. To uphold these principles, we utilize recruitment management systems that ensure compliance with local legislation and alignment with our internal standards. Every stage of the hiring process is conducted with fairness, respect, and dignity, reinforcing our commitment to an inclusive and transparent recruitment experience for all.

#### **4.5. Non-Discrimination and Anti-Harassment**

We recognize that diversity encompasses a broad range of characteristics, including but not limited to race, gender, color, religion, nationality, age, civil status, physical or mental ability, pregnancy, social background, ethnicity, sexual orientation, gender identity, political opinion, or any other personal traits or preferences. By upholding this principle across all aspects of employment—recruitment and hiring, training and development, promotion and compensation, and every term and condition of work—we aim to build a talented and diverse workforce that drives innovation, fosters collaboration, and reflects the values we cherish as a company.

We are committed to protecting the rights of individuals from disadvantaged groups and actively working to expand their opportunities within our business. Through these efforts, we strive to create an environment where every person can thrive and contribute meaningfully.

#### **4.6. Working Hours**

We comply with all applicable regulations, practices, and collective bargaining agreements in the countries where we operate regarding working hours. To ensure a fair and efficient working environment, employees are provided with regular breaks as well as vacation and leave entitlements in line with legal requirements and our internal standards.

#### **4.7. Freedom of Association and Collective Bargaining**

We uphold Freedom of Association and Collective Bargaining as fundamental rights for all employees. We respect every individual's right to freely associate, join or form labor unions, and engage in collective bargaining without fear of intimidation, discrimination, or retaliation. We are committed to maintaining open communication and constructive engagement between employees and management, ensuring that employee voices are heard and considered. Our goal is to foster fair and equitable working conditions through collaboration, trust, and mutual respect.

#### **4.8. Fair Wage and Benefits**

We are dedicated to upholding equal pay for work of equal value and promoting gender pay equality across all positions and levels. Our positions are graded using a renowned, objective job grading system, free from gender or other discriminatory biases. Wages and benefits are determined based on sectoral trends, local labor market data, company financial performance, and in accordance with applicable regulations and collective

bargaining agreements, where relevant. We comply with or exceed all applicable minimum wage requirements and ensure that wages and reimbursable expenses are paid promptly and entirely. Our total compensation packages may include performance-based bonuses and additional benefits for rewarding contributions and supporting employee welfare. Any deductions from gross wages are conducted solely in line with local laws and with the employee's consent, and are transparently shared through regularly issued pay statements, in accordance with legal requirements.

#### **4.9. Personal and Professional Development**

We are committed to supporting the continuous growth of our employees by providing opportunities for both personal and professional development. Our approach includes offering access to training programs, skill-building initiatives, and learning resources that enable employees to enhance their capabilities and advance their careers. Development opportunities are offered fairly and without discrimination, ensuring equal access for all employees. We encourage participation in learning activities that align with individual aspirations and organizational goals, fostering a culture of lifelong learning. Through mentorship, performance feedback, career planning and internal mobility, we aim to empower employees to reach their full potential and contribute meaningfully to our company's success.

#### **4.10. Data Privacy**

We are committed to protecting the privacy and confidentiality of all personal information entrusted to us. We apply robust administrative, technical, and physical safeguards to prevent unauthorized access, misuse, or disclosure of data, in line with applicable data protection laws. We also expect all employees to comply with the relevant privacy regulations in their respective countries.

#### **4.11. Political Activity**

We respect employees' individual rights, including freedom of expression, belief, and voluntary participation in political or charitable activities. However, personal political engagement must never involve company funds, resources, or working time. All such activities must comply with applicable laws and company policies and must not compromise our commitment to political neutrality, fairness, and an inclusive workplace.

#### **4.12. Health and Safety**

We are committed to providing healthy and safe working environments for all employees and any individuals present in our facilities. Our goal is to eliminate or reduce occupational risks, prevent injuries, and support physical and mental well-being by ensuring safe and appropriate working conditions. We continuously work to improve our health and safety performance and promote a culture of prevention and care across all operations.

#### **4.13. Prohibition of Unlawful Eviction**

We promote the sustainable use of land, forests, and water resources while safeguarding the rights of local communities and opposing forced evictions. We do not engage in or support practices that undermine these rights and expect our business partners to adhere to the same standards.

#### **4.14. Use of Private or Public Security Forces**

We ensure that security services uphold human rights and follow responsible, proportionate practices. Martur Fompak International security personnel are bound by our Global Code of Conduct or our Supplier Code of Conduct, which obligate them to respect all internationally recognized human and environmental rights.

### **5. ACCESS TO REMEDY AND GRIEVANCE MECHANISM**

We recognize the importance of providing effective remedies for any potential human rights abuses. Allegations will be promptly and impartially investigated; where a violation is confirmed, we will take appropriate remedial action including, where relevant, compensation, corrective measures, process changes, and reporting. We also analyze root causes of grievances to prevent recurrence and continuously strengthen our human rights management system

Our [Ethics Hotline](#) enables any individual to report concerns or complaints anonymously where permitted, related to our human rights practices, ensuring that all issues are addressed promptly, fairly, and transparently. We strictly prohibit any form of retaliation against whistleblowers or witnesses. For further details, individuals are encouraged to consult our [Whistleblowing Policy](#).

**6. AUTHORITY AND RESPONSIBILITIES**

All our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners who experience or witness any conduct they believe to be in conflict with this Policy, should report with assurance of confidentiality and protection from retaliation as outlined in our Whistleblowing Policy. In addition, they are also expected to align with and actively support these principles by promoting a workplace where everyone is valued and treated with dignity and respect.

**7. VIOLATIONS AND CONSEQUENCES**

By this Policy, we actively prevent and prohibit such aforementioned or similar conduct. Our zero-tolerance principle means; if such a conduct does occur, we will look into and review every allegation of violation, take appropriate action in order to maintain well-being at work which is a prerequisite. If there is a discrepancy between the local regulations, applicable in the countries where our company operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersedes. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by Business Partners or any third parties, their contracts may be terminated.

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