

**ECZACIBAŐI MONROL NÜKLEER ÜRÜNLER SANAYİ VE  
TİCARET ANONİM ŐİRKETİ**

**ECZACIBAŐI GROUP  
HUMAN RIGHTS POLICY**

**Version 0.1**

**1 September 2023**

## 1. PURPOSE AND SCOPE

The Eczacıbaşı Group<sup>1</sup> (“**Group**”) Human Rights Policy (“**Policy**”) provides guidance to Group companies on the human rights approach and standards they must adhere to in all their activities.

The Human Rights Policy is binding for employees in every Group company and for every activity; all Eczacıbaşı Group companies are responsible for acting in accordance with this Policy. Eczacıbaşı Group companies also expect all business partners to adopt the principles in this Policy and to act in accordance with the Policy to the extent applicable. Group companies strive to disseminate the principles in this Policy by encouraging all relevant business partners to adopt them.

The Policy is based primarily on the policies and principles of international organizations, and national and international human rights legislation. The Group’s fundamental human rights principles aim to ensure that employees have a work environment which is peaceful, safe, transparent, equitable, honest, fair and upholds their human dignity. Every human resource process is aligned with ethical principles and human rights, from recruitment to promotion, from development to the determination of remuneration and fringe benefits.

Human rights violations are not tolerated in Eczacıbaşı Group, so Group companies must ensure that they are not taking part in these violations. Child labor and forced labor are strictly prohibited throughout the Eczacıbaşı Group.

Discrimination based on any visible or invisible factors such as race, color, gender, religion, sect, marital status, sexual orientation, sexual identity, philosophical opinion, political opinion or belonging, ethnic identity, health status, family responsibilities, economic situation, union activity or membership, physical disability or age is absolutely unacceptable in all human resources processes and business relationships.

As stated in the Eczacıbaşı Group's Code of Conduct, the Group's management approach is based on respect for people. Human dignity is above all values. The Eczacıbaşı Group embraces the principle of respecting human rights in its relationships with all stakeholders. The Eczacıbaşı Group's human rights approach is based primarily on the regulations listed below:

- ❖ United Nations Universal Declaration of Human Rights
- ❖ United Nations Global Compact (UNGC)
- ❖ Women's Empowerment Principles (WEPs)
- ❖ International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- ❖ United Nations Guiding Principles on Business and Human Rights

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<sup>1</sup> The “Eczacıbaşı Group” or the “Group” refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

- ❖ OECD Guidelines for Multinational Enterprises
- ❖ German Supply Chain Due Diligence Act
- ❖ Relevant national and international legislation.

## **2. GENERAL PRINCIPLES AND COMMITMENTS**

The Eczacıbaşı Group respects the rights of everyone directly or indirectly affected by its activities, in particular its employees, shareholders, suppliers, subcontractors, business partners and customers. It takes into account the conditions of disadvantaged groups who are more vulnerable to human rights violations.

### **Prevention of Child Labor and Forced Labor**

Eczacıbaşı Group companies do not accept any form of forced labor. They do not allow any individual to work involuntarily or because of threats. They adopt a zero-tolerance policy against human trafficking and enslavement.

The employment of children under the working age, as determined by laws and internationally accepted norms, negatively affects children's physical and psychological development, leading to the deprivation of their right to education and the abuse of their labor. For this reason, Eczacıbaşı Group companies adopt a zero-tolerance policy against child labor.

The Eczacıbaşı Group prohibits child labor in all its companies in accordance with the child labor principle set out in the "International Labor Organization's Declaration on Fundamental Principles and Rights at Work".

### **Zero Tolerance for Violence, Discrimination and Harassment**

The Eczacıbaşı Group undertakes to create a work environment that is free from all acts of ill treatment, such as physical or psychological violence, bullying, humiliation, discrimination and harassment. Abuse, threats, harassment and bullying of any kind are not tolerated within the Group, nor are situations that threaten peace and security.

Employees are also expected to refrain from discriminatory language and actions and to oppose all kinds of discriminatory behavior.

### **Equity, Diversity and Inclusion**

Diversity and inclusion enriches all institutions. Based on the requirements of employees' jobs, the Eczacıbaşı Group offers equal opportunities to everyone regardless of their national or ethnic origin, social status, health status, disabilities, sexual orientation, age, gender, political view, religion or world view. Group companies prefer that their employees have different cultures and experience backgrounds.

The application of objective criteria in remuneration, an important indicator of equal opportunities, is at the core of the Group's remuneration policies. The Eczacıbaşı Group guarantees that its remuneration policy ensures that there is no discrimination in the wages of employees in similar positions.

## **Healthy and Safe Working Environment**

Providing a healthy and safe work environment is one of the main priorities of all Group companies. Group companies take every necessary measure to protect the health and safety of employees and other people (suppliers, subcontractors, visitors, etc.) on operational sites. They comply fully with national occupational health and safety regulations as well as the principles of the Eczacıbaşı Group Occupational Health and Safety Policy.

## **Work Conditions**

Eczacıbaşı Group companies determine their work conditions in accordance with the legislation, laws and regulations of the country in which they operate. Employees are offered flexible work conditions that take into account the characteristics of their jobs and their personal preferences. Companies comply with local work hours and remuneration policies. Employees are encouraged to take regular leave to focus on their private life and achieve a healthy work-life balance. To ensure fair remuneration, companies consider wage levels in relevant sectors, the state of the local labor market, and the provisions of collective bargaining agreements, if applicable.

## **Supporting Employee Development**

The Eczacıbaşı Group provides comprehensive opportunities for employees to improve their existing knowledge and skills and develop their potential in other fields. Employees are supported by structured internal and external training.

## **Protection of Privacy**

In the Eczacıbaşı Group, the personal information of each employee is protected by high-level data privacy measures. The Group's privacy policy is based on the provisions of relevant legislation. Employees are expected to comply with the data privacy laws of the country of operation and the rules of the Eczacıbaşı Group.

## **Right of Organization and Collective Bargaining**

In the Eczacıbaşı Group, employees' right to unionize and organize is protected, and employees can exercise these rights freely. Unions that act in accordance with legal regulations may organize in Group companies. Group employees can freely join these legal unions and take part in their management without fear of retaliation. Company management is expected to establish constructive relations with legal union representatives freely chosen by employees.

## **Taking part in Political Activities**

Political activism is a constitutional right as well as an internationally recognized human right. Eczacıbaşı Group companies respect the constitutional right of their employees to participate individually and voluntarily in legal political activities. However, employees must carry out these activities outside of work hours and not use Group resources for political activities.

Eczacıbaşı Group companies do not take the side of any political view or ideology. Company resources cannot be used to support political parties and candidates, and promotional and donation activities cannot be used to support a political movement. Political propaganda and

party candidates are not allowed on company sites. As stated in the Eczacıbaşı Group's Code of Conduct, under no circumstance can employees play a role in the management of any political party.

### **3. IMPLEMENTATION RESPONSIBILITY**

This Policy was drawn up by Eczacıbaşı Holding's Human Resources Office and Sustainability, Corporate and Government Affairs, and entered into force with the approval of Eczacıbaşı Holding's Board of Directors following a favorable assessment by the Eczacıbaşı Holding ESG (Environmental, Social, Governance) Committee.

Overseeing the implementation of the clauses set out in this Policy is the responsibility of the senior management of Group companies. Group companies' business units assume responsibility for implementation in their respective areas of responsibility. Monitoring of Policy implementation in Group companies is carried out by the Human Resources Office and Human Resources Departments of Group companies.

Eczacıbaşı Group companies carry out their activities in countries where different legal regulations apply. In the case of a discrepancy between this policy and applicable local legislation, the stricter regulation in terms of the protection of human rights shall prevail if permitted by binding local legislation.

Eczacıbaşı Holding's Audit Group and the internal audit units of each company evaluate the implementation status of this policy during the regular audits carried out at certain intervals in line with annual audit plans.

### **4. POLICY REVIEW**

This Policy shall be reviewed and assessed on an annual basis by the Eczacıbaşı Group Human Resources Office and the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs. If there is a significant change in the organization's practices that is likely to affect the Policy, the Policy shall be reviewed and adjusted by both the Eczacıbaşı Group Human Resources Office and the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs. The changes made in the Policy will enter into force following the approval of the Board of Directors.

### **5. SUGGESTION AND COMPLAINTS**

Requests for information, suggestions and complaints regarding the Policy can be shared anonymously through the VCO (*Virtual Compliance Officer*) notification channel (<https://eczacibasi.vco.ey.com/>) or sent to [uyum@eczacibasi.com.tr](mailto:uyum@eczacibasi.com.tr) via e-mail. The Eczacıbaşı Group Code of Conduct Manual states the actions to be taken in cases of behaviours and practices that violate this policy.

Employees or other stakeholders who make notifications and complaints in good faith regarding behaviours violating the norms of this Policy shall not be exposed to retaliatory behaviour and attitudes.