

1. PURPOSE

The purpose of the Batıçım Human Rights Policy ("Policy") is to emphasize the importance attached by Batıçım Batı Anadolu Çimento Sanayii A.Ş. and its subsidiaries under its direct and indirect control ("Batıçım") to approaches and standards based on Human Rights, in line with the principles of economic, environmental, and social sustainability, primarily for its employees and also for its business and solution partners, suppliers, and contractors during the course of its operations.

The main reference sources of this Policy are the human rights-related policies and principles of international organizations, as well as national and international legislation. In this context, Batıçım observes and applies the following Human Rights frameworks in its activities:

- United Nations Universal Declaration of Human Rights
- United Nations Global Compact
- Women's Empowerment Principles
- ILO Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- Other relevant national and international legislation

In line with its vision and mission, Batıçım is committed to providing all employees with a dignified, peaceful, safe, transparent, fair, honest, and equitable working environment throughout their employment, in accordance with fundamental human rights principles. From recruitment onward, and throughout promotion, development, compensation, and benefits processes, all employees are treated in compliance with the Code of Business Ethics and Working Principles ("Code of Business Ethics and Working Principles") and Human Rights.

Batıçım does not tolerate human rights violations and avoids being a party to such violations under any circumstances.

The Human Resources Department of Batıçım does not engage in discrimination in any business process or employment relationship based on visible or non-visible characteristics such as race, nationality, color, religion, language, age, sect, marital status, sexual orientation, gender identity, philosophical beliefs, political opinions or affiliations, ethnic origin, health status, family responsibilities, economic status, trade union activities or membership, or physical disability.

2. SCOPE

This Policy covers all human rights-related processes within Batıçım. Within the scope of its stakeholders and business processes, Batıçım expects all business partners to act in accordance with this Policy and takes the necessary measures to ensure compliance.

3. DEFINITIONS

3.1 United Nations Universal Declaration of Human Rights

The United Nations Universal Declaration of Human Rights ("Declaration") is a landmark document in the history of human rights. It declares that Human Rights must be recognized as a universal standard for all humanity and affirms that all individuals, without distinction of race, color, gender, language, religion, political or other opinions, national or social origin, property, birth, or other status, are entitled—individually or as part of a corporate

group—to freedom of action, the right to own property, freedom of thought, conscience, and religion, freedom of expression, and freedom of peaceful assembly and association.

3.2 United Nations Global Compact

The United Nations Global Compact (“UNGC”) is an initiative announced by the United Nations that calls on companies to align their operations and strategies with universally accepted principles in the areas of human rights, labor standards, environmental protection, and anti-corruption. By adopting and implementing these principles, companies commit to creating a better environment for society and the planet.

3.3 Women’s Empowerment Principles

The United Nations Women’s Empowerment Principles (“WEPs”) are a global framework developed by the United Nations to promote women’s economic participation, leadership, access to education and healthcare, and gender equality. These principles encourage the business community to take action on gender equality and women’s rights.

4. RESPONSIBILITIES

All Batıçım employees and managers at every level, including senior management, are responsible for complying with, implementing, and supporting this Policy. Batıçım expects and supports its suppliers, contractors, and business and solution partners in acting in accordance with this Policy.

5. PRACTICES

5.1 ILO Declaration on Fundamental Principles and Rights at Work

The ILO Declaration on Fundamental Principles and Rights at Work is a document adopted by the International Labour Organization (“ILO”) aimed at protecting employee rights and labor standards. The Declaration seeks to ensure respect for fundamental human rights, recognition of freedom of association and the effective right to collective bargaining, elimination of all forms of forced or compulsory labor, abolition of child labor, and elimination of discrimination in employment and occupation.

5.2 United Nations Guiding Principles on Business and Human Rights

The United Nations Guiding Principles on Business and Human Rights provide a framework for protecting and promoting human rights in business activities. These principles aim to ensure that companies commit to respecting human rights, improving labor standards, preventing discrimination, and protecting employee rights.

5.3 Human Rights

Human rights are the universal, equal, and inalienable rights and freedoms inherent to all human beings. These rights aim to protect human dignity and promote freedom and well-being. Human rights ensure that all individuals benefit equally without discrimination, free from oppression, and based on the rule of law. They are universal in nature and intrinsically linked to human dignity, and are protected by international treaties and agreements, placing responsibility on states, societies, and individuals.

5.4 General Principles and Commitments

By fulfilling the principles of the Declaration and the ILO Declaration on Fundamental Principles and Rights at Work, Batıçım respects the human rights of all individuals directly or indirectly affected by its activities, including employees, shareholders, suppliers, subcontractors, business and solution partners, and customers.

Batıçım treats all employees honestly and fairly and assumes responsibility for providing a safe, healthy, and respectful working environment free from discrimination and respectful of human dignity.

5.5 Zero Tolerance for Child Labor and Forced Labor

Batıçım strictly opposes child labor. It rejects all forms of child labor that harm children physically or psychologically or deprive them of their right to education and applies a zero-tolerance policy toward such practices.

Batıçım also takes necessary measures to prevent forced labor and other forms of abuse in recruitment processes and throughout its supply chain. It raises awareness through internal training programs and aims to promote public awareness on this issue.

Batıçım acknowledges that the values and mission set forth in this Policy regarding the protection and promotion of human rights are a reflection of Batıçım itself and expects all employees to adopt and implement these principles.

5.6 Prevention of Discrimination

A zero-tolerance policy against discrimination is a fundamental principle across all recruitment, promotion, assignment, and training processes. Batıçım expects all employees to demonstrate the same level of sensitivity in their interactions with one another.

Batıçım is committed to equal pay for equal work and to providing equal rights and opportunities. No form of discrimination or disrespect based on race, gender (including pregnancy), color, nationality, religion, age, disability, sexual orientation, family status, sensitive medical conditions, trade union membership or activities, or political opinion is tolerated.

5.7 Equality, Diversity, and Inclusion

Diversity and inclusion are considered corporate assets at Batıçım. All practices are applied equally based on job requirements, without regard to national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion, or worldview.

Batıçım places great importance on the principle of equality by providing equal pay for equal work, as well as equal rights and opportunities. Any form of discrimination or disrespect based on race, gender, color, nationality, religion, age, disability, sexual orientation, family status, sensitive medical conditions, trade union membership or activities, or political opinion is rejected.

No discrimination or discriminatory behavior among employees is permitted within Batıçım. Respect and equal treatment for everyone are fundamental principles, and a fair and transparent approach is adopted throughout all business processes, from recruitment to promotion opportunities.

5.8 Zero Tolerance for Harassment and Violence

Harassment and violence are strictly prohibited at Batıçım. The company is committed to providing a safe and comfortable working environment for all employees.

No form of physical, verbal, sexual, or psychological harassment, bullying, abuse, or threats is tolerated. Disciplinary actions are imposed by the Batıçım Ethics Committee ("Ethics Committee") against individuals engaging in such behavior, while protecting the dignity and reputation of employees.

Employee safety and well-being are prioritized at Batıçım, and a zero-tolerance policy is enforced against all forms of harassment and violence.

5.9 Healthy and Safe Working Environment

Batıçım is committed to providing a healthy and safe working environment. The health and safety of employees and all individuals present at Batıçım's operational sites—including suppliers, contractors, subcontractors, business and solution partners, and visitors—are a top priority.

All legal requirements related to occupational health and safety are fully complied with, and continuous improvements are made to prevent workplace accidents and health risks through appropriate preventive measures.

Batıçım actively works to ensure the health and safety of its employees, contractors, suppliers, and business and solution partners and organizes continuous improvement initiatives and training programs in this area.

5.10 Working Conditions and Personal Development

Batıçım complies with legally defined maximum weekly working hours. It recognizes the importance of regular breaks and leave in maintaining a healthy work-life balance.

Compensation is determined competitively in line with labor market standards and applicable collective bargaining agreements, where relevant. All wages and benefits are paid in compliance with applicable laws and regulations.

Batıçım takes all necessary measures to protect employee rights, ensure a fair working environment, and fully comply with legal requirements.

Batıçım provides opportunities for employees to develop their skills and potential. Viewing human capital as a valuable resource, the company supports employees through internal and external training programs to foster personal development.

5.11 Freedom of Association and Collective Bargaining

Batıçım respects employees' rights to freedom of association and unionization and ensures that these rights can be exercised freely. It allows legally established trade unions and employee organizations in accordance with applicable legislation. Employees may join unions and take part in their management without fear, pressure, or coercion.

Batıçım maintains constructive relationships with representatives of legally recognized trade unions and cooperates with them when necessary.

5.12 Confidentiality

Batıçım protects employees' personal data using the highest standards of data protection. The company fully complies with the Turkish Personal Data Protection Law No. 6698 ("KVKK") and all applicable legislation regarding data privacy.

Accordingly, employees, contractors, suppliers, and business and solution partners are appropriately informed about the processing of personal data, and explicit consent is obtained where required. Special categories of personal data, which may pose a risk of discrimination, are subject to strict access limitations and may only be accessed by authorized individuals when necessary.

Batıçım takes all necessary measures to protect personal data and respect privacy. Employees and relevant parties are informed about their rights under data protection regulations, and data subject request forms are made available in Word format on the relevant Batıçım company website.

5.13 Political Activities

Participation in political activities is a constitutional right and a universally recognized human right. Batıçım respects employees' rights to voluntarily engage in lawful political activities outside working hours, provided that company resources are not used for such activities.

Batıçım does not support any political party or ideology. Company resources may not be used to support political parties or candidates, and promotional or donation activities may not be conducted in a manner that supports political movements. Political campaigning is not permitted at Batıçım premises.

Employees participating in political activities must observe the following principles:

- Avoid situations that may create conflicts of interest with their professional duties and responsibilities.
- Not use the company name, job title, or Batıçım resources in individual political activities.
- Not engage in political propaganda during working hours or in the workplace, and not pressure other employees to join political parties or activities.

6. REPORTING AND DOCUMENTATION

All documents related to human rights processes—including regulations, procedures, instructions, forms, and contracts—are regularly archived and stored in Oracle, SoftExpert, and electronic systems.

7. VIOLATIONS AND CONSEQUENCES

If you become aware of any conduct or practice that violates this Policy or applicable human rights legislation, you may submit your report to Batıçım via the following e-mail or postal address:

E-mail: etik@batianadolu.com

Address:

Attn: Human Resources Department

Batıçım Batı Anadolu Çimento Sanayi A.Ş.

Ankara Street No: 335

Bornova / İZMİR

8. EFFECTIVE DATE

This Policy shall enter into force upon approval by the Members of the Board of Directors.

9. IMPLEMENTATION

The Human Resources Department is responsible for the preparation, review, updating, and implementation of this Policy and may receive support from the Legal Department. Relevant department managers are responsible for implementation within their respective units.

10. RELATED DOCUMENTS

- Batıçım Diversity, Equality, and Inclusion Policy
- United Nations Universal Declaration of Human Rights
- United Nations Global Compact

- United Nations Women's Empowerment Principles
- ILO Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- Batıçım Freedom of Association Policy
- Batıçım Code of Business Ethics and Working Principles