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POLICY - 010

HUMAN RIGHTS POLICY

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1. Purpose

The purpose of this Human Rights Policy is to determine, understand, internalize the human rights rules and behaviours that are foreseen to be complied with at Brisa, and to raise awareness about the underlying values, based on the Universal Declaration of Human Rights, the International Declaration of Human Rights (UDHR) and the Basic Labour Standards of the International Labour Organization.

Brisa is a signatory of the United Nations Global Compact.

2. Scope

This policy is an integral part of Sabancı Holding Code of Business Conduct (SA-ETIK) and Brisa Sustainability Policy. All Brisa employees work in accordance with the fundamental principles and policies of human rights. Rules and policies are shared with those who do business with Brisa, namely our stakeholders, customers, and suppliers/business partners.

3. Fundamental Principles

The fundamental principles are;

To promote human rights, to value diversity, and to treat employees with dignity and respect;

To create a positive working environment that is trustworthy, provides support and assistance to our employees, shows zero tolerance to all forms of violence, is egalitarian, fair, safe, does not accept any form of violence, is inclusive and nourishes from diversity, and to support this environment with its corporate culture;

To raise awareness on human rights, gender equality, and domestic violence, and to support all our employees to adopt the principles and raise awareness against all forms of violence.

IN ACCORDANCE WITH OUR FUNDAMENTAL PRINCIPLES;

Respect for Diversity and Inclusion

We are committed to:

Taking initiatives for the steps to be taken towards the empowerment of women in society, business, and economic life that will improve gender equality, and to set gender equality targets for the company as a whole,

Guiding the managers, to deploy this sensitivity and awareness to our employees with the safe work environment we aim to create,

Providing support to all employees who have been exposed to violence and discrimination or who are at risk of being exposed to violence, in case of a request (no requirement of proof, the statement is sufficient) for assistance from our Human Resources Department, in informing them, in guiding them to the relevant official and non-governmental organizations for support, in sudden developing and unexpected problems, and performance and safety issues,

Respecting the privacy of victims and those at risk, to provide support to ensure that the position of the victim in our workplace is minimally affected.

Prohibition of Discrimination and Harassment

In recruitment and dismissal processes, compensation policies, promotion and development opportunities, we undertake not to base and tolerate any qualifications, such as religion, language, race, nationality, ethnicity, creed, gender, age, social status, physical conditions, and life preferences, that will be perceived as discrimination, and not to include discriminatory practices and not to tolerate such attitudes and behaviours.

We are committed to protecting the rights of individuals in disadvantaged groups and expanding their business opportunities.

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Responsible Business Management

We are committed to:

Ensuring that our business processes comply with laws, regulations, and standards,

Prohibiting unacceptable child labour, forced labour, and human trafficking in our organization and supply chain,

Developing measures to improve the findings by examining the managerial and social dimensions depending on the aging workforce.

Protection of Free Speech

We are committed to creating a culture that allows for diversity and includes employees through open communication.

4. Notification and Resolution of Non-Compliance with Human Rights

If the employees learn that their Human Rights or the legal regulations to which the Company is subject have been violated, they are obliged to report this primarily to their managers, if the situation is directly related to the manager, to the Company Ethics Code Advisor, and/or the company CEO/General Manager. If no action is taken and no results can be obtained, they should notify the Holding Ethics Committee. If the situation in violation is related to the senior management of the Company, the issue should be reported directly to the Holding Ethics Committee.

Notifications made to the company are finalized and resolved in line with the company's internal functioning and procedures. The Company informs the Holding Ethics Committee on important matters and in other cases, it deems necessary and seeks its opinion. If the Holding Ethics Committee deems it necessary, it can directly conduct the review process itself. Those who violate the basic principles of human rights, the Code of Business Ethics, or the Holding/Company policies and procedures will be subject to various disciplinary sanctions, up to the extent that they are required to leave the job, if necessary.

Disciplinary sanctions will also be applied to those who approve or direct the inappropriate behaviour and actions that cause breaking the rules, or who have knowledge of these issues and do not make the necessary notification properly. In addition, those who have negative attitudes and behaviours towards people who make any complaints and notifications or assist during the investigation are not tolerated in the same way.

Intentional notices that are false and/or slanderous are interpreted as a violation of ethical rules. The Holding/Company or employee who has been lied to or slandered may apply to legal remedies separately, within the scope of the Turkish Penal Code, Labour Law, and Code of Obligations, against those who made the aforementioned notification.

5. Human Rights Compliance Objective

- Full compliance with human rights with all our stakeholders zero human rights complaints
- Human rights awareness trainings which are repeated every year

6. Responsibility

All Brisa employees are responsible for the adoption and implementation of this policy.

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