

# Borçelik

# Human Rights Policy

## ■ Brief

The Borçelik Human Rights Policy defines the principles governing our actions and behaviors related to human rights.

# Human Rights Policy

Through its Human Rights Policy, Borçelik addresses its responsibility to respect Human Rights in line with the United Nations Global Principles.

The policy, which focuses on areas that are priorities in our industry, is based on the following:

- The United Nations Global Compact
- The Universal Declaration of Human Rights (UDHR)
- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The United Nations Convention Against Corruption
- Law No. 3308 on Vocational Education and Training
- Turkish Labor Law No: 4857

For the purposes of this Policy, all of the above-mentioned documents will be referred to as “International Declarations of Human Rights”.

The Borçelik Human Rights Policy regulates the principles governing our actions and behaviors related to human rights. Along with an environment that respects human rights, which we plan to create through the company's operating procedures, we expect the policy and related practices to become stronger over time and help us prevent taking actions that directly or indirectly violate human rights.

This policy applies to all Borçelik sites and employees. We also expect subcontractors and contractors working for us at our sites to comply with this policy. Through our Sustainable Procurement Policy, we not only promote industry-based social and environmental standards but also encourage our subcontractors, contractors and suppliers to implement the principles of this policy by drawing the attention of our customers and business partners to these issues.

The Borçelik Human Rights Policy is a document that brings together and complements the human rights issues found in the company's other policies and guidelines.

It includes Borusan's Code of Conduct and Ethics (the Orange Guide), Occupational Health and Safety Policy, Environmental Policy, Energy and Human Rights Policies and Anti-Corruption Policies. While creating this policy, we primarily took into account the laws of the country in which we operate. As Borçelik, we are committed to complying with all applicable laws.

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Where our policy, procedures and external commitments are stricter than local laws, we follow our own standards. Where local laws are less stringent than the International Declarations of Human Rights, we develop a case-by-case response, referring to our company policy as a guide. In the case that local legislation prevents us from enforcing certain aspects of this policy, we comply with the applicable local laws, while making every effort to protect human rights.

## Specific Commitments and Provisions

### Commitments to Stakeholders

**Employees:** We are committed to respecting the human rights of our employees. Accordingly, we strive to raise the awareness of our employees in the workplace, as well as the communities directly affected by our operations about the need to be conscious of and respect human rights.

**Business Partners:** We respect and support human rights in communications with subcontractors, contractors, suppliers, customers and other business partners.

**Local Communities:** We respect the human rights of peoples potentially affected by our activities and seek to understand the cultures, traditions and values of communities by engaging in inclusive and open communication with them.

The Borçelik External Stakeholder Engagement Procedure requires open and inclusive communication with local communities, including with underrepresented groups such as women, children and local people.

### Specific Provisions

#### Occupational Health and Safety

##### Promoting Occupational Health and Safety

Borçelik is determined to work towards a goal of zero accidents and injuries, in addition to aiming to protect general health in the workplace. We support these objectives through our Occupational Health and Safety Policies and Procedures

#### Employee Rights

##### Supporting Freedom of Association

Borçelik supports the effective recognition of freedom of association and the right to collective bargaining.

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## **Freedom of Labour and Forced Labor**

Borçelik is against all forced and compulsory labor practices throughout both its own operations and its supply chain. To prevent indirect reference to or indirect support for such illegal practices, Borçelik carries out joint works with subcontractors, contractors and suppliers.

Borçelik ensures that cases of forced labor are reported and addressed through the Orange Ethics Line and the contact form available on the Borçelik website.

## **Prevention of Child Labor**

Borçelik does not allow child laborers to be employed within its operations. To prevent and eliminate all child labor practices and to act in the best interests of the child, Borçelik carries out joint works with subcontractors, contractors and suppliers.

## **Protecting the Rights of Juvenile Employees**

We are committed to preventing juvenile employees applying to Borçelik for vocational training from being exposed to activities that may harm their health or safety. Furthermore, we do not allow juvenile employees to engage in jobs that require experience or expertise they do not have, and we protect their rights in accordance with local legislation.

## **Preventing Illegal Discrimination in the Workplace**

Borçelik is committed to ensuring that all employees and prospective employees are treated fairly and respectfully. In this context, unlawful discrimination on the basis of race, nationality, social status, physical characteristics, gender, sexual orientation, age, religion, ethnicity, property, political views or affiliation, disability, birth, marital status or other matters will not be tolerated. The company aims to provide equal opportunity and advancement to everyone, without any discrimination.

## **Preventing Harassment and Violence**

Borçelik is committed to promoting a work environment free from harassment, exploitation, abuse or violence, as covered by any definition in the country in which it operates.

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## **Competitive salary and compensation**

Wage management is executed in accordance with legal obligations, taking into account the job size and complexity, performance, experience and the internal and external wage balance of individuals. Fairness and objectivity within the company, and the company's solvency are also taken into account for wage management purposes.

## **Compliance with Employment Conditions**

Borçelik complies with the legislation regarding all working conditions, including basic working hours and overtime, alongside the terms of the collective bargaining agreements with labor unions.

### **Local Communities**

#### **Avoiding Non-Consensual Resettlement**

Borçelik aims to avoid non-consensual resettlement. However in cases where it is absolutely unavoidable, Borçelik is committed to complying with the resettlement and rehabilitation referrals of the national government or regional authorities in addition to international human rights norms including Free, Prior and Informed Consent (FPIC).

#### **Respecting the Rights of Indigenous People**

Borçelik respects the human rights of indigenous people as defined in applicable national and international standards.

#### **Appropriate Security Arrangements**

Borçelik aims to ensure the security of all its operations. Its relations with security forces in the public and private sectors comply with the laws of the relevant country. The security arrangements put in place meet the need for security and respect human rights.

#### **Development of Applications Regarding Land and Water Use**

Borçelik implements land and water use practices that are consistent with international practices, respect human rights and support the Environmental and Water Policies.

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## Confidentiality

### Ensuring the Confidentiality of Complaints

Borçelik takes the necessary measures for implementing this policy. Persons affected by or witnessing a situation contrary to the principles set forth in this policy can submit their concerns anonymously by using the Orange Ethics Line (<https://turuncuetik.com/>). Any complaint regarding a violation of this Policy will be handled with the utmost confidentiality and in accordance with the Borusan Group Ethics Management Disciplinary Practices Principle.

### Consequences of the Violation of This Policy

Violation of this policy results in the application of disciplinary procedures against the violator or any other consequences stipulated by law. The entire disciplinary procedure, including the investigation, is carried out in a fair, impartial and transparent manner.

Borçelik takes the appropriate actions based on the outcome of the investigation. In this context, Borçelik cooperates with the competent authorities and, where applicable, legal action is initiated against an employee who is found guilty of engaging in inappropriate behavior which is regulated by the law.

## Implementation

An employee who detects a potential human rights violation in our operations or supply chain should immediately notify the relevant department manager and share this information with the Human Resources Department.

This policy constitutes a general overarching statement for other standards and procedures, such as the Sustainable Procurement Policy, External Stakeholder Engagement Procedure and the Borçelik Complaints Procedure.

We are pleased to receive feedback from interested parties and to engage in dialogue with these parties.

For all feedback regarding this policy, please refer to: <https://www.borcelik.com/En/feedback>

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