

# Human Rights Policy

## Statement of Enerjisa Enerji

Enerjisa Enerji is a company operating in Turkish power distribution and retail sector that seeks to provide safe, environmental-friendly, stable and uninterrupted energy to its customer for the benefit of people and society. We have a strong presence in the Turkish Market and professional workforce. Respect for human rights is an integral part of our corporate culture. We are committed to respecting all human rights wherever we operate.

### Our Commitment to Human Rights

This Human Rights Policy statement applies to all employees, management staff in all business units, business partners, within our sphere of influence, to further parties in our supply chain.

Enerjisa Enerji is a member of the UN Global Compact as of 07.10.2019 and thus, we uphold its ten principles in the fields of human rights, labor standards, environment and anti-corruption. Our commitment to human rights also includes the acknowledgement of the following international documents:

#### 1. The International Bill of Human Rights:

- Universal Declaration of Human Rights
- International Covenant on Civil and Economic Rights
- International Covenant on Economic, Social and Cultural Rights

#### 2. International Labour Organisations's Declaration on Fundamental Principles and Rights at Work.

We expect all our employees, business partners and parties in our supply chain to always regard the dignity, privacy and all fundamental human rights of each individual.

Enerjisa is committed to create a work environment, where all fundamental human rights in all its operations are respected. In line with this objective Enerjisa Enerji:

- Informs and trains all its employees and managers on the Human Rights Policy.
- Addresses opinions of its employees, clients, and stakeholders on human right issues.
- Undertakes to provide or cooperate for a fair and reasonable improvement and remediation in case of violation of the Human Rights Policy.
- Strives to end and remedy any negative impact of any identified human rights violations.

### **We support Equal opportunity and no-discrimination**

In all human resources processes such as recruitment, termination, wage compensation, training and reward management, work environment, we display an equal attitude regarding language, religion, nationality, race, ethnic origin, age, gender, marital status, health, disability status, political opinion, union membership and all similar matters. We resolutely do not tolerate discrimination and unfair conduct in any form. We provide our employees with a working environment, free from all kinds of ill-treatment, mobbing and harassment.

We strongly believe that we get strength from diversity and support inclusion in all areas.

### **We do not compromise on health and safety**

We attach importance to health and safety. We commit to reduce risks in our work environment and take measures to promote health, safety and well-being by constantly improving our processes.

We do not compromise on safety practices, behaviors or conditions.

We expect all our managers, employees and parties in the supply chain to comply with our health, safety and security regulations, promote a safe and healthy work environment and improve our health and safety culture.

We act in accordance with the legislative Health & Safety framework and regulation.

## **We have no acceptance for forced labor and child employment**

We stand against any forced labor including compulsory work, employment of illegal migrants, and foreign nationals without a work permit, forced labor, debt bondage and any kind of human trafficking, gender discrimination, illegal child labor, abuse of children and all other abusive or exploitative behaviors related to workers and conduct all our business processes accordingly. Individuals that are under 18 years of age are not hired, and Enerjisa complies with international conventions on children rights ratified by the Republic of Turkey, as well as the national legislation. These practices are open to inspection by public authorities.

We expect all of our employees and business partners to stand against forced labor, to prevent discrimination and harassment, to comply with legal working hours for employees, not to employ illegal child labor and to treat their employees and partners with dignity and respect.

## **We promote freedom of expression and association**

At Enerjisa Enerji, we:

- Respect freedom of expression of our employees and do not tolerate any conduct preventing exercise of freedom of expression.
- Support the right of unionization of employee under the applicable laws and regulations
- Attach importance to forming a workplace, which promotes cooperation and mutual respect.
- Are committed to engage in a constructive dialogue with labor union representatives elected freely by the employees.
- Aim to construct and develop social dialogue and labor peace with the labor unions.

## **We offer fair compensation and work hours**

At Enerjisa Enerji, we:

- Develop our remuneration policy competitively, taking into account the sector and labor market.

- Set the minimum wage level equal or above the statutory minimum wage.
- Are committed to offer opportunities to our employees that are competitive relative to the market.
- Comply with applicable laws, collective agreements, and regulations when setting daily and weekly work hours, overtime, breaks, weekends and annual paid leave.
- Regularly inform all business units about rules on overtime and monitor their implementations.

At Enerjisa Enerji, work environment takes into account the balance between work and private life of our employees.

### **We actively work against corruption and bribery**

As Enerjisa, we uphold following principles and committed not to tolerate and to counter corruption and bribery in whatsoever form throughout all our operations. We in particular:

- Adhere to all relevant legislation and regulations.
- Put strict limitations on giving and receiving gifts in any form.
- Ensure no harm to our employees refusing to pay bribes.
- Do not make political donations.
- Constantly monitor processes and operations in respect to countering corruption and bribery.
- Encourage our people to speak up in case of a breach.
- Train our people regularly on anti-corruption and anti-bribery.
- Report breaches on regular basis.
- Assure appropriate nomination and proportionate remuneration of our agents.
- Apply sanctions immediately to individuals that are in breach of anti-corruption and anti-bribery principles and rules.

## **We uphold the protection of personal data and legal compliance**

At Enerjisa Enerji, we:

- Follow the legislation for protection of all the personal data and information of our employees, customers and those related to field of our operations, and fulfil its obligations related thereto.
- Communicate our data security policies and procedures to our employees and creates awareness with our announcements and trainings.
- Avoid any act in all of our operations, which may constitute an offense or violation of rights of individuals of personal data protection and expects our employees to act in the same way.

## **We strive for protecting the environment and contribute to a sustainable planet**

We protect the environment. We constantly strive to be an environmentally-conscious energy partner of choice for our customers and society. In this context, we conduct all our activities, according to the following fundamental principles:

- While performing our activities, we adopt the principles of sustainable development and prevention of pollution at source.
- By reducing the wastes originating from our activities at source as much as possible, we ensure that wastes are recycled, recovered, reused or disposed without causing any harm or damage to the environment.
- We contribute in the fight against climate change. In this context, we conduct activities oriented towards reducing energy consumption, increasing energy efficiency, and reducing our greenhouse gas emissions.
- We aim at continuously reduce the consumption of water necessary for our activities by efficiently using water, one of our most important natural resources.
- We pay due attention and strive for direct and indirect biodiversity protection in all our operational areas.

- We aim to develop, expand and maintain environmental awareness across our sector and communities, and strive for being a role model within our industry when it comes to protecting the environment.
- We encourage our entire business network, including our employees, suppliers and business partners in particular, to maintain their environmentally-responsible activities.

## **Governance**

In order to attain a sustainable implementation of our approach towards human rights, a cross-functional “Environment, Sustainability and Governance Committee”, including the CFO and CEO, was established and commissioned to ensure an effective implementation of the Human Rights Policy.

As outlined above, Enerjisa Enerji adopts several operational policies to support and integrate its human rights commitment to our daily business. We have a responsibility to raise our employees’ awareness about human rights related issues and encourage them to take action to safeguard respect for human rights.

## **Grievance mechanism**

We constantly encourage reporting of any human rights violations, and frequently monitor potential problems and concerns about the effective implementation of our policy statement.

Besides all employees, business partners or any other third party may report suspicious policy violations via Enetik Hotline (+90 216 579 09 14) and/or e-mail to [ENETIK@enerjisa.com](mailto:ENETIK@enerjisa.com).

We do not take any retaliation or action against any employee who reports actual or potential violations and concerns under this policy. Regarding violation notifications, both the content of the notification and the information about the person making the notification are evaluated and kept with the highest confidentiality.

Violations of the Human Rights Policy may lead to disciplinary proceedings and legal sanctions. In case any violation is determined, procedures set out in the disciplinary provisions shall apply.

## Reporting and review

We are committed to reporting on our human rights performance, including the implementation of this policy statement, thereby upholding the principle of transparency. Through our annual sustainability report, the public is informed about our commitments, efforts and statements regarding human rights in accordance with this policy.

Furthermore, this policy statement is an integral part of Enerjisa's sustainability approach, and will together with other policies which include particular issues on human rights in more detail be reviewed and continuously improved in order to assure a sustainable implementation within our processes and procedures.



---

**Murat Pinar**

Enerjisa Enerji CEO



---

**Dr. Michael Sven Moser**

Enerjisa Enerji CFO