



HUMAN RIGHTS POLICY

Rev. Publication Date: 28.05.2024

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Enerjisa Enerji is a company operating in Turkish power distribution, retail, customer solutions and e-mobility 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, labour 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 Organisation'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 believe that business can only thrive in societies where human rights are protected and respected. We recognise that business has a responsibility to respect human rights and the ability to contribute to positive human rights impacts.

We are aware that developing a business model that respects human rights is an increasingly important priority for our employees, stakeholders, shareholders, investors, customers, consumers, the communities in which we operate and non-governmental organisations. For this reason, we consider it a theoretical duty of global citizenship to ensure the protection of human rights through our internal practices and business processes, to create workplaces in accordance with human dignity and to observe the same care in our value chain. We also expect our suppliers to comply with this policy and engage with their respective supply chains to ensure that their own suppliers also implement these principles.

Nothing in the Policy may conflict with the relevant applicable laws to which we are subject and does not relieve us of our responsibility before the applicable laws.

We carry out our work in the field of respect for human rights in accordance with our company policies.

GOVERNANCE

In order to continue to implement our approach to human rights in a sustainable manner, an interprocess " Environment, Sustainability and Governance Committee " was established with the participation of the Chief Financial Officer and the Chief Executive Officer, and this Committee was assigned to ensure the effective implementation of the Human Rights Policy.

Our business processes under the supervision of our CEO are meticulously managed by all our executives, including the Procurement Managers, Human&Culture Directors, Chief Legal and Compliance Counsels, Sustainability Group Manager/Director and **Compliance and Corporate Legal Director (who acts as as Human Rights Officer)**.

BASIS AND SCOPE

We have prepared our Human Rights Policy in line with the "United Nations Guiding Principles on Business and Human Rights", which includes the responsibilities of states and the business world in this field.

We take the Universal Declaration of Human Rights, the ILO Declaration on Principles and Rights at Work and the United Nations Global Compact, of which we have been a supporter since 10.07.2019, as a basis when we formulate our principles regarding the social and cultural rights of our employees and design our related business processes.

Conducting our business with honesty, integrity and transparency, respecting human rights and the legal and legitimate interests of all our stakeholders, especially our employees, is the cornerstone of our business ethics principles and practices.

We expect our business partners to adhere to business principles that are consistent with our own. We do not tolerate discrimination, forced labour, child labour and all forms of human rights abuse in our company or among our suppliers and we take commitments from business partners that they will act in compliance with both the Human Rights Policy and our other business principles. We reserve the right to terminate our supply contract for non-compliance with the Human Rights Policy.

COMBATING CHILD LABOUR AND PROMOTING YOUTH EMPLOYMENT

ENERJISA develops practices in compliance with all applicable laws on child labour, forced labour and youth employment, as well as United Nations International Labour Organization (UN International Labor Organization- ILO) standards and international agreements in these areas in all other geographies where ENERJISA does business, is represented and manages operations.

ENERJISA have a zero tolerance approach against any type of child labour in our own and our suppliers operations.

ENERJISA permits youth employment, provided that the working hours do not exceed the youth working hours, in part- or full-time jobs classified as light work, which support the professional development of the young person.

Young workers or interns who will work for ENERJISA or its suppliers must be registered as required by applicable law.

All suppliers employing young workers are required to comply with the related legislation and standards set out in the Policy.

ENERJISA expects its suppliers to apply the principles and standards of this Policy when selecting and working with their suppliers.

In the Convention No. 138 of the International Labour Organization (ILO), the minimum working age has been specified as 15, and 14 for some developing countries. Employees under minimum age fall within the definition of child labour. Child labour should not be used under any circumstances.

1. Our suppliers must not employ workers below following limits, whichever is the highest:

- a. At least 15 years of age
- b. The age of completing compulsory education
- c. The legal working age within the country

2. Young workers under the age of 18, shall be protected from working overtime and nightshifts, and they should under no circumstances undertake hazardous work as defined in the Minimum Age Convention 1973 (No 138).

3. Our suppliers must have in place effective management systems which prevent child labour and protect young workers including:

- a. Have in place a policy on the prohibition of child labour clearly stating the minimum age which must be at least 15 years.
- b. Have in place a policy which prohibits young workers from undertaking any work defined as hazardous work as per the Minimum Age Convention 1973 (No 138).
- c. Have in place an adequate age verification process to collect and maintain all documentation required to confirm and verify workers age such as birth certificates and other types of identification.
- d. Have in place a system for identify workstations and operations that are considered hazardous according to applicable laws.
- e. Maintain government required permits for the employment of young workers.

All these mentioned issues will be implemented to the highest extent possible in accordance with the Turkish labor and energy legislation to which Enerjisa companies are subject.

COMBATING FORCED LABOUR, HUMAN TRAFFICKING AND INFORMAL EMPLOYMENT

We have a zero tolerance approach against any type of modern slavery and human trafficking. Forced or bonded shall not be used in our own and our suppliers operations.

While maintaining our stance against all forms of forced labour, human trafficking and unregistered employment, we fully respect the right of our employees to work and leave their jobs freely and expect the same behaviour from our suppliers. We will never tolerate behaviour contrary to this policy in any of our suppliers.

Respect for Employees' Documents and Wages: Employees' personal documents (IDs, passports, work permits, workers should never be required to lodge 'deposits', be charged penalties, etc.) or wages are never confiscated by the company or managers. Such actions are considered a form of forced labour and are against our company policy.

Retaliation-Free Work Environment: Employees can exercise their right to leave their jobs without fear of retaliation. These rights of employees form the basis of our recruitment and employment processes and are protected.

Right to Fair Wages: Employees are assured that they will receive full and timely remuneration in accordance with the applicable law for the days worked in the event of resignation or termination of employment unless otherwise set out by the applicable law. All recruitment fees and related costs should be borne by the employer. No fees and costs should be charged to workers.

Libertarian Working Conditions: It is essential that employees are not employed under coercive or threatening conditions. All employees have the right to freely choose a job and leave work.

TAKE CARE TOWARDS THE COMMUNITY AND STAKEHOLDERS

We act with the awareness that we are a part of society in all geographies where we conduct our business, and we develop our business processes with this awareness. While conducting our business, we establish a relationship with all our stakeholders,

including vulnerable and disadvantaged groups, in which their views are listened to and taken into account on human rights issues of importance to them. When necessary, we engage in dialogue with civil society representatives and stakeholders on human rights issues related to our business.

DIVERSITY AND INCLUSION

We value the differences of the people we work with and avoid all practices that may make them feel excluded, and we prohibit such practices in our suppliers. We are committed to equal opportunity at ENERJISA. When making recruitment, placement, development, training, remuneration and promotion decisions, we take the qualifications, performance, skills and experience of the employee as a basis and give importance to merit.

COMBATING DISCRIMINATION AND HARASSMENT

We strive to be a dignified workplace free from discrimination, harassment and disrespect based on race, gender, skin colour, national or social origin, ethnic origin, religion, age, disability, sexual orientation, gender expression, political opinion or any other status protected by applicable law.

We do not tolerate disrespectful or inappropriate behaviour or unfair treatment, regardless of personal characteristics or circumstances. Discrimination and harassment are unacceptable and intolerable behaviours for us, whether in the workplace or in a work-related situation outside the workplace.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the right of our employees to join, form or not join a trade union without fear of reprisal, threats or harassment. We are committed to constructive dialogue with the freely chosen representatives of our employees who are represented by a legally recognized trade union where FoA rights are restricted, it is expected that suppliers find parallel means for promoting/developing independent and free association and bargaining.

SAFE AND HEALTHY WORKPLACE

The safety and health of its employees is paramount for ENERJISA. Our occupational health and safety (OHS) approach is based on our "zero accident" target. ENERJISA attaches importance to providing a safe working environment for our business partners and employees. Our policy in this area is to provide a safe and healthy

workplace and to comply with applicable occupational health and safety laws, regulations and internal requirements.

We work to provide and maintain a healthy and productive workplace environment by identifying and solving risks that may cause accidents, injuries and health problems in consultation with our employees.

PERSONAL SAFETY AT WORK

We are committed to providing a workplace free from violence, harassment, intimidation and other unsafe or offensive conditions resulting from internal or external threats.

WORKING HOURS, WAGES AND PERSONAL RIGHTS

We set our remuneration policy competitively according to the industry, the local labour market and in accordance with the terms of applicable collective bargaining agreements. We conduct our operations in full compliance with applicable laws on wages, working hours, overtime and benefits. We provide our employees with opportunities to develop their talents and potential and to make progress.

We are committed to securing the right to fair and timely remuneration for all our employees. This commitment aims to support not only the financial well-being of our employees, but also their motivation and satisfaction at work.

Legal Compliance: All our working hours practices are designed and implemented in accordance with relevant applicable laws and regulations. The minimum wage level must be equal to or above the minimum legal standards.

Fair Remuneration: The wages of our employees are determined by taking into account the nature of their work, industry standards, local cost of living and legal minimum wage regulations. A policy of equal pay for equal work is applied to all employees, regardless of gender, age, ethnic origin, religion or other discriminatory factors.

Timely Payment: Employees' wages are paid in accordance with the determined payment schedule and without any delay. All payment transactions are carried out through transparent mechanisms that employees can access and easily follow through their payslips.

Transparency of Remuneration Structure: Employees are provided with full transparency regarding their remuneration structure, additional payments, bonuses and all other financial benefits. All employees, including new hires, are informed about their remuneration structure and any changes are announced in a timely manner.

Additional Payments and Bonuses: Based on company performance and individual contributions, additional payments and bonuses may be offered to employees within the framework of fair and objective criteria. Such payments aim to increase motivation and encourage employee participation in achieving company goals.

Earned Leave and Overtime Pay: Employees are encouraged to use their earned leave and employees who work overtime in accordance with the applicable law are paid overtime wages. In line with the Hours of Work (Industry) Convention 1919 (No 1) suppliers must not require workers to work over 48 hours of regular work weekly, and total working hours must not under any circumstances exceed 60 hours per week. Overtime must be voluntary and compensated at a premium rate as per applicable law. Workers must not work more than 60 hours per week or in line with the local limit of working hours, whichever is less, except under extraordinary circumstances keeping overtime in fair and legal limits.

Flexible Working Hours: We endeavour to offer flexible working hours options, taking into account the personal and family responsibilities of employees.

Overtime Management: Overtime is worked only when required by the work and with the consent of the employee. Care is taken to keep overtime within fair and legal limits.

Break and Rest Times: Workers have a work pattern such that they have adequate break and rest times so that they can re-energise and maintain their productivity throughout the day. Breaktimes must be provided as per applicable law.

Compulsory Rest Periods: Weekly working hours and mandatory rest periods during the day are determined so that employees have the opportunity to get enough rest. Workers must be entitled to at least 24 hours of consecutive hours of rest in every 7-day period. If workers must work on a rest day, they must be compensated with an alternative rest day in the same 7-day period, or immediately following the day they work.

Working Hours Recording: Effective systems are used to ensure transparent and accurate recording of working hours.

Work-Life Balance: We take care to ensure that our working hours policy is flexible and supportive for the personal development of our employees and for them to establish a balanced relationship between family life and work responsibilities.

Continuous Improvement and Dialogue: Our remuneration policies are regularly reviewed and improved when necessary, based on industry standards, economic conditions and employee feedback. We are committed to open communication and dialogue with our employees.

RESPONSIBLE SUPPLY CHAIN MANAGEMENT

We have a large and diverse extended supply chain and recognise the critical role our suppliers play in helping us to source responsibly and sustainably.

Our Responsible Supply Chain Policy sets out our expectations for respecting the human rights, including labour rights, of those working in our supply chain.

We strive to work with suppliers who declare compliance with our Responsible Supply Chain Management Policy and we make effort to develop practices to support their continuous development.

Our Responsible Supply Chain Management Policy contains information and serves as a guide for our ethics counselling and reporting hotline, which is open to all our stakeholders.

RIGHT TO SAFE AND HEALTHY HOUSING

We consider it a fundamental right for all our employees and individuals in our supply chain to have access to safe, healthy and clean housing conditions worthy of human dignity. Accordingly, we intend that, if any, all accommodation facilities provided by our company and our suppliers are organised and maintained in accordance with international standards and applicable local legislation.

Safety and Health Standards: All our accommodation will meet the highest health and safety standards, including fire safety, ventilation, cleanliness and personal hygiene requirements. These standards are regularly audited and improved.

Accessibility and Equality: Housing services are provided fairly and equally to all employees regardless of gender, age, ethnicity, religion or other discriminatory factors.

Privacy: We respect the privacy of our employees and make arrangements to ensure the protection of personal space and privacy even in multi-person rooms.

Social and Psychological Support: Our accommodation facilities are designed to take into account the social and psychological needs of employees. This includes areas for social interaction and the provision of psychological support services if required.

Continuous Improvement and Communication: We aim to communicate with our employees and individuals in our supply chain and receive feedback in order to improve housing conditions.

PREVENTION OF VIOLENCE AND GENDER-BASED VIOLENCE HARASSMENT, EMPOWERING WOMEN THROUGH RIGHTS, SKILLS, COMPETENCES AND OPPORTUNITIES

We advocate the equality of women and men in the common denominator of humanity, but we continue our work without ignoring the fact that women may be exposed to different risks than men.

We recognise that many women around the world live under the pressure of discrimination, lack access to education and opportunities for skills development, and are prevented from active participation in the economy. We believe that poverty, discrimination and violence against women are the biggest obstacles to development opportunities for a society.

Women are an integral part of our business model and growth ambitions. We take care to be an egalitarian and inclusive company where women participate equally, free from discrimination, and to select our suppliers among such businesses. At ENERJİSA, we believe that respect for women's rights and women's participation in economic life is a priority for winning in the long term.

RIGHT OF ACCESS TO REMEDY

We are committed to ensuring that all our employees and individuals in our supply chain have access to a fair, fast and effective resolution process in case of rights

violations or other negativities. As an expression of this commitment, we have established a transparent, accessible and fair whistleblowing mechanism.

Enerjisa is committed to provide or cooperate in providing appropriate remediation where the company has caused or contributed to adverse human rights impacts.

To make it possible for grievances to be addressed early and remediated directly, Enerjisa commits and prompt its suppliers to establish or participate in effective grievance mechanisms for individuals and communities who may be adversely impacted by their business.

Expectation that suppliers adopt a similar commitment to enable effective remedy to any adverse human rights impact occurred in the course of their operations.

1. **Accessibility of Whistleblowing Mechanism:** Our employees and individuals in our supply chain have access to mechanisms where they can easily and safely submit their complaints without any discrimination.
2. **Fair and Objective Investigation:** All complaints are processed and evaluated as soon as possible in accordance with the principles of fairness, impartiality and confidentiality.
3. **Feedback and Follow-up:** Complaint processes are managed by providing regular feedback to the applicant, if possible, and following up until a solution is found.
4. **Protective Measures:** While the complaint process continues, necessary measures are taken to prevent further harm to the individuals concerned.
5. **Corrective Action and Compensation:** If, as a result of a fair assessment of complaints, violations of rights or other adverse impacts are identified, appropriate corrective action will be taken and, if necessary, the most appropriate method will be chosen to eliminate the damage.
6. **Confidentiality:** The complaint process is based on the principle of protecting the privacy of all individuals involved.
7. **Continuous Improvement:** Our grievance mechanism and resolution processes are regularly reviewed and improved, making them more effective for all employees and supply chain members.

Enerjisa aims to provide appropriate remediation or cooperate in cases where the company causes or contributes to adverse human rights impacts.

To enable early handling and direct resolution of complaints, Enerjisa and its suppliers aim to establish or participate in effective complaint mechanisms for individuals and communities that may be negatively affected by their business.

Enerjisa aims to provide an effective solution to any negative human rights impacts occurring during the activities of its suppliers.

All of our employees, as well as our business partners and other third parties, can forward their requests of guidance to Human Rights Officer and suspicions regarding policy violations to Enetik Call Line (+90 216 579 09 14) and/or send an e-mail to ENETİK@enerjisa.com.

RELATED POLICIES AND PROCEDURES

- Third Party Relations Policy
- Anti-Retaliation Policy

CONTINUOUS DEVELOPMENT AND REPORTING

ENERJISA Human Rights Policy consists of basic principles that form the basis of all our policies and procedures, especially our employment and supply chain management processes, and that we use as a guide when creating our relevant procedures. We share our progress in compliance with these principles with all our stakeholders through the sustainability report we prepare annually, and in this way, we renew our commitment to continuous development, which is the most valuable of our commitments, every year and improve our targets.

As part of our Annual Sustainability Report, we report to the community on our commitments, efforts and statements on human rights in accordance with the Human Rights Policy. This reporting refers to the UN Guiding Principles Reporting Framework.

In addition, this policy statement is an integral part of Enerjisa's sustainability approach and will be reviewed together with other policies detailing more specific human rights issues and will be continuously improved to ensure its sustainable implementation in our processes and operations.

DEFINITIONS

In the labour legislation, working conditions of child and young workers are regulated separately to ensure their health and safety, physical, mental, moral and social development, to enable them to continue their education and to prevent their economic exploitation.

- A child labourer is a person who has completed 14 years of age, has not completed 15 years of age and has completed primary education.
- A young worker is a person who has completed the age of 15 but has not completed the age of 18.
- In any country where ENERJİSA carries out commercial operations, the principles and conditions of this Policy shall apply even if the age of the young worker is less than 15, which is the age specified in the Policy.
- In any country where ENERJİSA carries out commercial operations, if the age of young workers is older than 15, which is the age specified in the Policy, and/or if the working conditions and standards related to young labour impose more conditions and higher standards than the Policy, the standards imposed by applicable law shall apply.
- Light work, according to its nature and character and according to the special conditions during its performance;
Not likely to have a detrimental effect on the development or health and safety of young people,
Work that does not interfere with school attendance, vocational training or participation in a training programme approved by the competent authorities and the benefit from such activities.
- The daily working hours of young workers shall be applied in a twenty-four-hour period, taking into account an uninterrupted rest period of 14 hours.
- If the type of work is classified as "hazardous work", young workers cannot be employed under any circumstances.
- Dangerous work is work in which no one under the age of 18 can work and which involves the following risks:
Work where there is a risk of physical, psychological or sexual abuse,
Work carried out underground, under water, at dangerous heights or in confined spaces,
Work requiring the use of dangerous machinery and vehicles,
Work requiring heavy load and material handling,
Work exposed to substances that may be hazardous to health,
Work exposed to high vibration, heat or noise.

- Forced labour is a situation in which a person is deprived of his/her legal rights and made to work without his/her consent, in return for a penalty, and without being registered. The fact that the person is paid a certain amount does not indicate that the situation is not forced labour.
- Situations that may be examples of forced labour:
Bonded labour,
Creating situations where the person has no right to refuse to work,
It covers situations in which prisoners or convicted persons are employed without special supervision by a public authority, unless otherwise established by a court decision.

FINAL PROVISIONS

This Policy has been prepared in Turkish and English and is available on the Enerjisa website and Quality Document Management System (“QDMS”).

This Policy is an integral part of Enerjisa's sustainability approach and Enerjisa Code of Conduct.

This Policy has been approved and entered into force by the Board of Directors.