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Document Name	<b>KAPTAN DEMİR ÇELİK POLICIES MANUAL</b>

Revision Information

	Rev./Issue Date	Page No	Details of Change	Authorized Person
Issue No: 01 Rev: 00	21.09.2018	All	First Issue	E.S. MANAGEMENT REPRESENTATIVE
Rev 01	06.10.2021	All	General review and organizational structure update	E.S. MANAGEMENT REPRESENTATIVE
Rev 02	20.06.2023	2	Section 6.2 HUMAN RIGHTS POLICY - Modern Slavery Act Statement added	E.S. MANAGEMENT REPRESENTATIVE
Rev 03	14.11.2024	TÜM	Human Resources Policy removed.	E.S. MANAGEMENT REPRESENTATIVE


Dağıtım

Kopya No	
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**KONTROLSÜZ KOPYA**

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INTEGRATED SYSTEMS MANAGEMENT  
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APPROVED BY  
BOARD MEMBER

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## 1 OBJECTIVE

**Human Rights Policy,** Our company demonstrates sensitivity in implementing practices in line with fundamental principles such as human rights, labor rights, and social justice.

**Anti-Bribery and Anti-Corruption Policy,** Commitment to ethical principles, transparency, and zero tolerance for bribery and corruption are our core values in all our business processes and relationships.

## 2 SCOPE

The policies in this manual cover the Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş.

## 3 RESPONSIBILITY

The Integrated Systems Management Representative is responsible for the preparation, review, revision and publication of this manual and the Executive Committee Member is responsible for the approval of it with regard to competency prior to publication.

## 4 RELEVANT DOCUMENTS

## 5 DEFINITIONS

## 6 IMPLEMENTATION

### 6.1 HUMAN RIGHTS POLICY

Our company is sensitivity in implementing the requirements of international agreements to which our country is a party, such as the International Labour Organization (ILO) conventions and the United Nations Universal Declaration of Human Rights, in accordance with fundamental principles including human rights, labor rights, and social justice. It is committed to promoting equal opportunity and combating discrimination, disadvantages, harassment, and threats.

Any form of discrimination against employees or managers, or among them, is prohibited, and all assessments concerning them are conducted regardless of gender, physical or mental disability, pregnancy, maternity, age, race, religion, language, sect, belief, cultural or social class differences. Human Resources management encourages employee participation and creativity in business processes through transparent communication channels established to receive employee suggestions and feedback. The company supports employees' personal and professional development through continuous feedback and training to increase motivation and organizational commitment.

Acts contrary to the moral and ethical values of our company, such as slander, statements and actions that harm honor and sensitivity, unfounded accusations, false declarations, attacks on legal

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rights and/or reputation, and unsubstantiated criminal behaviors aimed at tarnishing individuals or institutions, are considered disciplinary offenses.

Our company commits to prohibiting any rhetoric or actions that support slavery or human trafficking in all processes. It also pledges to ensure the welfare and fair treatment of employees, providing equal opportunities in recruitment, training, promotion, job descriptions, freedom of organization, and compliance with labor legislation.

Our employees are responsible for embodying and applying these principles within the framework of trust and honesty in their interactions with colleagues and other business relationships.

### **Modern Slavery Act Statement**

*This statement is made by Kaptan Demir Çelik Endüstri ve Ticaret A.Ş. in accordance with the reporting requirements of Section 54 of the United Kingdom Modern Slavery Act 2015.*

*Our company adopts a commitment to respect human rights and unequivocally reject modern slavery and human trafficking. We regard our compliance with the Modern Slavery Act as an integral part of our sustainability strategy and place it at the core of our business ethics. We continuously work to understand and eliminate the risks related to modern slavery and human trafficking.*

*Within this framework, we embrace a continuous improvement approach to define our commitments and progress. Our company diligently monitors modern slavery and human trafficking risks within our supply chain and rigorously reviews these issues annually during the Management Review Meeting (MRM).*

*Our Supplier Code of Ethics and commitments require all suppliers to exercise the same care concerning issues such as modern slavery and human trafficking. We expect all our partners to respect human rights and uphold a zero-tolerance approach to modern slavery.*

*Our company remains determined to combat modern slavery and human trafficking and will continue to regularly share updates on developments in this area.*

## **6.2 ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

All forms of bribery and similar unethical behaviors and actions that are legally punishable are strictly prohibited. We aim to ensure compliance with the highest ethical standards and anti-bribery laws that everyone affiliated with our company must uphold. Based on our core priorities of honesty and transparency, we maintain a zero-tolerance attitude towards any corruption activities committed by our employees or stakeholders acting on behalf of the company.

Our company commits that offering or requesting bribes, or providing advantages, undue priority, or incentives through gifts, rewards, or similar means by our employees or any stakeholders in business relationships is unacceptable according to our ethical and moral standards.

KAPTAN



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When behaviors outside the ethical and moral values of our company arise, a detailed and comprehensive investigation will be conducted. If deemed necessary, disciplinary procedures including suspension and legal actions will be initiated in accordance with our company's disciplinary policies.

The principles defined in this policy stem from our company's commitment to integrity and sustainable business practices. These principles and commitments require adherence to integrity, transparency, and accountability in all decisions, and foster a compliance culture with the clear understanding that bribery and corruption are absolutely unacceptable.