

YASAR GROUP

HUMAN RIGHTS POLICY

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① INTRODUCTION AND LEGAL / INSTITUTIONAL BASIS

The corporate values of the Yasar Group provide a strong foundation for the universality and indivisibility of human rights and for their integration into all ways of doing business.

The principles of Valuing People, Being Ethical, Transparency and Trust, Sustainability, Openness to Change and Innovation demonstrate that respect for human rights is not only a responsibility but also an indispensable part of the corporate culture.

Prepared with this understanding, the Yasar Group Human Rights Policy (the "Policy") has been structured in alignment with both national legislation and international human rights standards.

The fundamental basis of the Policy consists of legal, ethical and universal principles grounded in respect for human dignity.

The Yasar Group Human Rights Policy has been established in line with the following:

- Constitution of the Republic of Türkiye
- Labour Law No. 4857 and the relevant secondary legislation
- Universal Declaration of Human Rights
- United Nations Global Compact (UNGC)
- International Labour Organization (ILO) Conventions
- OECD Guidelines for Multinational Enterprises
- Current global standards and practices relating to human rights

The Yasar Group adopts these foundations not merely as a legal obligation, but as a corporate responsibility placed at the center of its ways of working, decision-making processes and all stakeholder relationships.

② PURPOSE

The purpose of the Yasar Group Human Rights Policy (the "Policy") is to:

- define human rights principles and commitments across the organization and to ensure that this awareness becomes widespread among employees and all stakeholders;
- create a sustainable and ethical working environment by integrating the principle of respect for human rights into business processes and relationships;

- ensure the effective operation of processes for the prevention, detection, reporting and necessary intervention in human rights violations.

Through this Policy, the Yasar Group confirms that respect for human rights constitutes an integral part of its corporate culture and aims to ensure compliance with universal standards and legal requirements.

③ SCOPE

This Policy covers all companies within the Yasar Group, all employees, managers, members of the Board of Directors, part-time and temporary personnel, interns, and all third parties acting on behalf of the Group.

Such third parties include suppliers, subcontractors, contractors, dealers, distributors, representatives, agents, consultants, business partners and any service providers.

The Policy applies to all business processes and business relationships in which the Group has a direct and/or indirect impact.

In this context, it covers not only internal Group practices but also all corporate areas of activity, including the supply chain, customer relations, social contribution activities, sponsorships, donations and investment decisions.

The Group expects all stakeholders with whom it works to act with respect for human rights. Within this framework, the Group develops mechanisms to ensure that relevant obligations are included in contracts, that necessary information and training are provided, that practices are monitored and, where necessary, that sanctions are applied.

The Policy applies in all geographies where the Group operates.

Where local legislation provides a higher level of protection in terms of human rights, priority shall be given to such provisions.

Where local legislation provides a lower level of protection, the Group shall apply international norms as the basis.

④ PRINCIPLES AND COMMITMENTS

The Yasar Group adopts the following fundamental principles and commitments with respect to human rights and expects all Group companies to implement them.

4.1. | Non-Discrimination and Equality

No discrimination shall be permitted on the basis of language, religion, belief, race, color, gender, disability, political opinion or any other personal characteristic.

In addition, inequalities of opportunity arising from corporate or structural practices shall also be prevented.

Equal opportunities shall be provided and inclusive practices shall be encouraged.

4.2. | Rejection of Forced Labor and Child Labor

All forms of human rights violations, including forced labor, human trafficking and child labor, are explicitly rejected.

Due care shall be exercised with respect to the age limits established under national legislation.

4.3. | Fair and Safe Working Conditions

It is essential to provide all employees with a safe and healthy working environment free from harassment and abuse.

No tolerance shall be shown under any circumstances for psychological, physical or sexual harassment.

4.4. | Inclusion and Participation

Working environments shall be structured in such a way that differences are acknowledged, participation is encouraged and all individuals are treated with respect.

4.5. | Reporting Mechanisms and Protection

Transparent and accessible mechanisms shall be established for reporting situations that involve suspicion of human rights violations.

Individuals who submit reports shall be protected in accordance with the principle of confidentiality, and no punitive action shall be taken in relation to reports made in good faith.

4.6. | Monitoring and Improvement

Reports and processes relating to human rights violations shall be regularly analyzed by the Yasar Holding Ethics Committee (“the Ethics Committee”).¹

Findings shall guide the identification of risk areas, training needs and policy updates.

⑤ IMPLEMENTATION AND RESPONSIBILITIES

The effective implementation of the Yasar Group Human Rights Policy is possible only through the shared responsibility of all organizational units and individuals.

The roles and responsibilities for the implementation of the principles and commitments set out in this Policy are defined as follows:

5.1. | Boards of Directors and Senior Management

The processes for identifying, preventing and taking necessary action in relation to human rights risks shall be carried out under the coordination of the Yasar Holding Ethics Committee (“the Ethics Committee”).

Boards of Directors and senior management of the Group companies shall be responsible for implementing the actions determined by the Ethics Committee.

Management shall:

- ensure that human rights risk and impact assessments are conducted;
- oversee the integration of the provisions of this Policy into corporate strategy and business processes;
- ensure that necessary actions in response to alleged violations are taken in a timely and effective manner.

1 The Yasar Group Ethics Committee is the single committee across the Group; it receives all reports of violations and ethical applications, evaluates them, determines the necessary actions and manages the process. All Group companies shall be obliged to implement the decisions taken by this Committee.

5.2. | Human Resources, Sustainability and Audit Units

The monitoring of human rights-related reports, the preparation of reports and the implementation of action plans shall be carried out under the coordination of the Ethics Committee.

These units shall:

- carry out awareness activities and training programs relating to the Policy;
- monitor and improve the effectiveness of reporting and reporting mechanisms;
- support relevant reporting processes.

5.3. | Employees

All employees of the Group shall be obliged to act in compliance with the Human Rights Policy.

Employees shall:

- report any human rights violations when they become aware of them;
- refrain from any discriminatory or retaliatory conduct against individuals who submit such reports.

5.4. | Suppliers, Subcontractors and Business Partners

The Yasar Group expects all parties with whom it conducts business to act with respect for human rights.

Compliance with the provisions of this Policy shall be observed in contracts with such parties. In cases of non-compliance, the necessary sanctions may be applied.

⑥ REPORTING MECHANISMS, MONITORING AND REVIEW

Within the Yasar Group, all reports relating to human rights violations shall be managed through a single centralized structure:

The Yasar Holding Ethics Committee (“the Ethics Committee”).

These mechanisms cover not only the receipt of reports but also the evaluation, resolution, monitoring and continuous improvement of the related processes.

- The Yasar Group establishes strong and accessible reporting mechanisms in order to prevent, detect and effectively address human rights violations.
- All employees, business partners and stakeholders shall report human rights violations and any suspicion thereof to the Ethics Committee without delay.
- Reports shall be submitted to the Ethics Committee through secure and confidential communication channels.
- The identity of individuals making reports in good faith shall be kept confidential and no retaliatory action shall be taken against such individuals.
- Reports may be submitted with identification; anonymous reports shall only be considered where supported by concrete and credible evidence.

Detailed reporting processes and communication channels are defined in the Yasar Group Ethics Policy, and the relevant communication channels are also set out below:

- **Reporting via email**² : etik.kurul@yasar.com.tr
- **Reporting via telephone**³ : 0850 217 79 39
- **Reporting via post**: For the attention of the Ethics Committee – Yasar Holding Ethics Committee, Akdeniz Mah. Şehit Fethi Bey Cd. No:120/Z1 Alsancak Konak / İzmir

⑦ MONITORING AND UPDATING OF THE POLICY

This Policy entered into force pursuant to the resolution of the Yasar Holding Board of Directors dated 05.11.2025.

Responsibility for the implementation of the Policy shall rest with the company General Managers and the Human Resources function; responsibility for monitoring effectiveness shall rest with the Yasar Holding Human Resources Directorate; and responsibility for audit shall rest with the Yasar Holding Audit Directorate.

The preparation, updating and approval of the Policy shall be carried out under the coordination of the Yasar Holding Human Resources Directorate and the Ethics Committee. The Policy shall be reviewed periodically.

In the review process, national legislation, international human rights standards, stakeholder feedback and findings derived from internal practices shall be taken into consideration.

² A single email address shall be used by all Group companies for ethics reporting.

³ Reports submitted via telephone shall be received directly by the Ethics Committee Secretariat.

In order to monitor the effectiveness of the Policy, certain indicators (such as training participation rates, number of reports and supplier audits) shall be monitored.

In extraordinary circumstances or in cases of serious violations, a special committee may be established with the approval of management.

⑧ ENTRY INTO FORCE

This Policy shall enter into force as of 25.12.2025, having been published as an annex to Circular No. 15/HR, and shall be made publicly available on the corporate website of Yasar Holding.

