

NUROLHOL-C-2023-0150-ENG
Human Rights Policy

NUROL HOLDING HUMAN RIGHTS POLICY

At Nurolog Holding, we place significant emphasis on upholding human rights across all sectors in which we operate, aligning with our commitment to sustainable development. We have adopted an approach that prioritizes the respect for human rights among all our stakeholders involved in our business relationships, with a special focus on our employees, who are both our primary stakeholders and our most invaluable asset. Our overarching goal is to promote and safeguard human rights within society as a whole. In this regard, we provide an equal, inclusive, fair, liberal, and modern working environment for our employees that upholds human rights. We are committed to providing equal opportunities to all our employees, irrespective of factors such as race, language, age, gender, ethnic origin, belief, political opinion, or any other personal characteristic. Discrimination and any actions that may promote discrimination are strictly prohibited and not tolerated within our organization.

We are committed to adopting the following principles as part of our corporate human rights practices:

- To operate in compliance with international and national legal obligations, particularly the United Nations (UN) Universal Declaration of Human Rights, International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, United Nations Global Compact (UNGC), and Women's Empowerment Principles (WEPIs),
- To provide a working environment that upholds human rights, continually enhances social justice and labor rights, and establishes optimal conditions in accordance with occupational health and safety standards, and to ensure the implementation of health and safety measures for all employees alongside suppliers and subcontractors at our sites, while fully complying with legal regulations on occupational health and safety and adhering to the Nurolog Holding Occupational Health and Safety Policy,
- To integrate our approach to diversity, inclusion, and equal opportunity into every aspect of our business processes,
- To provide all our employees with salaries and fringe benefits that are fair and in line with their respective positions,
- To establish our remuneration strategy based on objective criteria, ensuring equal opportunities and avoiding discrimination against employees in similar positions within our remuneration policy,
- To refrain from any form of discrimination against our employees based on factors including but not limited to race, language, religion, religious beliefs, sect, ethnic origin, age, position, gender, gender identity, sexual orientation, color, physical characteristics,

country of birth, marital status, pregnancy, dependents, disability, social class, union membership, or political opinion. This commitment applies to all aspects, including recruitment, promotion, compensation, benefits, training, employment, and all other processes,

- To adopt a zero-tolerance approach to all forms of harassment, humiliation, violence, and bullying (verbal, physical, sexual, psychological, and/or emotional), to ensure effective communication by establishing suggestion and complaint mechanisms to address reports effectively, to protect peace and security in the workplace, and to provide a working environment where no form of harassment, threats, or bullying is tolerated,
- To support women's participation in the workforce, ensure equal gender opportunities in all human resources practices, and aim to increase women's employment,
- To improve gender balance in the decision-making mechanisms of our companies,
- To prioritize the input of all our stakeholders, particularly our employees, by building mechanisms for expressing concerns, suggestions, and complaints, and to harness this feedback to enhance our operations and drive continuous improvement,
- To respect the rights of local communities in the regions where we conduct our operations, to guide our activities with this consideration, and to facilitate stakeholder participation through transparent and accountable methods,
- To avoid child labor at any stage of our activities,
- To prevent forced or compulsory labor that violates laws and regulations at any stage of our activities, and to refrain from procuring materials or services from companies that use forced or compulsory labor,
- To prioritize work-life balance when designing the working environment and conditions, to strictly implement all applicable legal provisions, especially the Law on the Protection of Personal Data, safeguarding the personal data of all employees, and to ensure the implementation of data privacy measures,
- To ensure that our suppliers and subcontractors adhere to human rights principles and comply with this Policy, and to apply the relevant sanctions under the Anti-Bribery and Anti-Corruption Policy in case of any non-compliance.

This Policy is subject to periodic reviews and updated as required, with the Nurol Holding Corporate Communications and Sustainability Department being responsible for its updates. It was approved by the Board of Directors of Nurol Holding Inc. on 25.04.2024 with decision number 2024/6 and came into effect on the same date.