SOCAR TÜRKİYE HUMAN RIGHTS POLICY DOCUMENT

PURPOSE

SOCAR Türkiye Enerji A.Ş. and its group companies* ("SOCAR Türkiye") form a group of companies of energy that is rigorous to approach diversity, equity, and inclusion in its business processes and aims to provide its employees with a multi-voiced, development-oriented, and participatory work environment that respects human rights. With the Human Rights Policy and Guiding Principles ("Policy") prepared within the scope of the "Our Energy is Diversity" project, SOCAR Türkiye seeks to promote an inclusive and fair approach that safeguards and promotes human rights within the organization, in production processes, supply chains and among all other stakeholders.

*SOCAR TURKEY Group Companies are as follows: SOCAR TURKEY ENERJİ A.Ş., STAR RAFINERI A.Ş., PETLİM LİMANCILIK TİC. A.Ş., SOCAR TURKEY PETROKİMYA A.Ş., SOCAR TURKEY AKARYAKIT DEPOLAMA A.Ş., SOCAR TURKEY FIBER OPTIK A.Ş., SOCAR TURKEY PETROL TIC. A.Ş., AZOİL PETROLCÜLÜK A.Ş., SOCAR GEMİ ACENTELİĞİ A.Ş., RAFİNERİ HOLDİNG A.Ş., SOCAR TURKEY YATIRIM A.Ş., SCR MÜŞAVİRLİK VE İNŞAAT A.Ş., SOCAR TURKEY HAVACILIK A.Ş., SOCAR TURKEY ELEKTRİK YATIRIMLARI HOLDİNG A.Ş., SOCAR POWER ELEKTRIK ÜRETIM A.Ş., SOCAR POWER ENERJI YATIRIMLARI A.Ş., SOCAR PETROKİMYA YATIRIMLARI A.Ş., PETKİM SPECIALITIES MÜHENDİSLİK PLASTİKLERİ SANAYİ VE TİC. A.Ş., SOCAR TURKEY ORTAK YÖNETİM HİZMETLERİ A.Ş., SOCAR ALİAĞA LİMAN İŞLETMECİLİĞİ A.Ş., SOCAR TURKEY ARAŞTIRMA GELİŞTİRME VE İNOVASYON A.Ş., SOCAR SIGORTA VE REASÜRANS BROKERLIĞI A.Ş., SOCAR TURKEY DOĞAL GAZ YATIRIM A.Ş., SOCAR ENERJİ TİC. A.Ş., ENERVİS ENERJİ SERVİS SANAYİ VE TİC. A.Ş., BURSAGAZ BURSA ŞEHİRİÇİ DOĞALGAZ DAĞITIM TİC. VE TAAHHÜT A.Ş., KAYSERİGAZ KAYSERİ DOĞALGAZ DAĞITIM PAZARLAMA VE TIC. A.Ş., PETKİM PETROKİMYA HOLDİNG A.Ş

SCOPE

All SOCAR Türkiye employees are obliged to comply with the principles and principles contained in this Policy. All stakeholders with whom SOCAR Türkiye is in contact are expected to operate in line with this Policy, to the extent permitted by the applicable laws and regulations and considered to be legally appropriate and appliable by SOCAR Türkiye.

Expressions that are not explicitly defined in this Policy but are capitalised have the meanings specified in the SOCAR Türkiye Diversity, Equity and Inclusion Policy.

REFERENCES

- In-house Application Principles
- SOCAR Türkiye Code of Ethics
- SOCAR Türkiye Diversity, Equity and Inclusion Policy
- Remuneration Policy
- Legal Regulations in Turkish Legislation
- Constitution of the Republic of Türkiye
- Labour Law No. 4857
- International Labour Organization's (ILO)
 1998 Declaration on Fundamental
 Principles and Rights at Work
- Convention on the Rights of the Child
- United Nations Global Compact
- International Covenant on Civil and Political Rights
- Women's Empowerment Principles (WEPs)
- OECD Directory of Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- International Legislation, Conventions, Policies and Documents
- International Human Rights Conventions

COMMITMENTS

Protecting and Promoting Human Rights

SOCAR Türkiye respects the inherent rights of all people around the world, regardless of race, colour, national or ethnic origin, language, religion or belief, disability, age, health status, gender characteristics, sexual orientation or other status, and works to protect and promote these rights.

Anti-Discrimination

At SOCAR Türkiye, measures are taken to ensure that a person or group is not deprived of human rights and freedoms on the basis of any of the factors that may cause discrimination (race, colour, national or ethnic origin, religion or belief, disability, gender, etc.). Trainings are organised for all stakeholders in order to disseminate the human rights perspective and to ensure that all measures taken are implemented within the organisation.

Prevention of Violence and Sexual Harassment

SOCAR Türkiye focuses its efforts on the prevention of gender-based violence and sexual harassment. SOCAR Türkiye prioritises the mental and physical well-being of all its employees and stands against all forms of violence and sexual harassment. It establishes grievance mechanisms to create a safe working environment; make arrangements to make these mechanisms accessible.

SOCAR Türkiye acknowledges that recognising and addressing violence and various forms of harassment is the initial step toward taking action against these issues. Consequently, the company conducts trainings sessions and seminars to raise awareness of violence and harassment. SOCAR Türkiye is committed to fostering a peaceful work environment and a society free from violence.

Equal Opportunity

SOCAR Türkiye recognises the diversity of current needs and plans steps to respond to these needs. Aware that treating everyone "equally" is not sufficient to eliminate inequalities, SOCAR Türkiye adopts the principle of implementing temporary special measures to ensure equal opportunities.

Freedom of Association

SOCAR Türkiye respects freedom of association and cooperates with legally recognised trade unions representing employees. SOCAR Türkiye plans the steps it will take regarding employee relations by taking into account the negotiations with trade unions.

Diversity

SOCAR Türkiye recognises and supports the uniqueness and diversity of all individuals with whom it comes into contact. Consistent with its sustainability strategy, the company incorporates diversity considerations into its recruitment and promotion processes, leave policies, and corporate culture to ensure a divorce workforce.

Equity

SOCAR Türkiye works to ensure that its stakeholders are not subjected to discrimination for any reason and that all stakeholders have equal access to rights and services. SOCAR Türkiye recognises the needs brought about by diversity and makes protective and preventive arrangements to meet these needs.

Inclusivity

SOCAR Türkiye is aware and accepts that all identities in the companies are equal in terms of rights. SOCAR Türkiye ensures transformation within the organisation so that no one feels "excluded" or "left behind" and everyone feels "included".

Preventing Child Labour

Child labour is not allowed at SOCAR Türkiye. SOCAR Türkiye acknowledges that all stakeholders are committed to act in line with the Universal Declaration of Human Rights, the Convention on the Rights of the Child and the International Labour Organization's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work. It terminates the work with the stakeholders who are found to be in violation of this article.

Health and Safety

SOCAR Türkiye provides the appropriate environment to protect the health and safety of every individual in production processes and supply chains. Security services are provided in compliance with the legislation in a manner that does not harm anyone's honour. In the event that unsafe working conditions are detected in the working area, including contractor companies, SOCAR Türkiye shall immediately make the necessary arrangements and re-establish the safety of the employees in that area. SOCAR Türkiye organises the necessary trainings and other seminars in accordance with the legislation for its own employees and the necessary field-entry orientations for contractor employees in order to raise the awareness of people in all work areas on occupational health and safety. SOCAR Türkiye takes the necessary steps to carry out measurements in all production processes and supply chains regarding safety management and to report them to the relevant units.

Industry-Specific Good Practices

SOCAR Türkiye adopts human rights exposure programs developed specifically for the energy sector and takes into account the measurement levels in these programs.

Open and Transparent Communication

SOCAR Türkiye is responsible for communicating this Policy to all employees and external stakeholders. If deemed necessary, it organizes information meetings in this field and aims to establish an open and transparent communication with employees.

Implementation and Monitoring

SOCAR Türkiye produces various tools (Ethics and Corporate Social Responsibility Committee, Sexual Harassment and Violence Prevention Board, trainings tailored to focus groups, seminars aimed at the participation of all employees) to integrate the human rights approach into the organisation and all stakeholders. The impact of these tools and practices is monitored and evaluated through checklists prepared to be used in various units of SOCAR Türkiye and in supplier evaluations and audits in order to protect and improve human rights. SOCAR Türkiye conducts analyses on the negative impacts that may arise as a result of the policies it pursues in this field, and cooperates with specialised institutions. In case of a negative effect, it takes the necessary actions to eliminate that impact.



AUTHORISATIONS AND RESPONSIBILITIES

SOCAR Türkiye is obliged to communicate this Policy to all its employees and external stakeholders to the extent permitted by the applicable laws and regulations and considered to be legally appropriate and appliable by SOCAR Türkiye. All managers of SOCAR Türkiye are responsible for ensuring that the relevant procedures compliant with this Policy are realised in line with the requirements in this Policy. Each company within SOCAR Türkiye group expects all of its stakeholders to act in compliance with this Policy and to take the necessary steps to ensure this, to the extent permitted by the applicable laws and regulations and considered to be legally appropriate and appliable by SOCAR Türkiye.

All employees of SOCAR Türkiye are required to uphold the provisions of this SOCAR Türkiye Human Rights Policy and Guiding Principles Document. This Policy can be updated at any time within the framework of the principle of continuous development, and arrangements are made on the articles deemed necessary. In the event that SOCAR Türkiye employees encounter behaviour contrary to this Policy, which has been approved by the Executive Board, they are expected to call out this behaviour and apply to complaint mechanisms.

In this context, those who wish to share should notify the SOCAR Türkiye Ethics Hotline. Although notifications may be made anonymously if desired, in any case, SOCAR Türkiye will not tolerate any retaliation or discrimination against anyone who makes a notification in good faith and those who attempt to do so will be subject to disciplinary action. A Diversity, Equity and Inclusion project team has been established within SOCAR Türkiye in order to carry out the processes within the scope of this Policy. The said project team prepares the necessary action plans for the reflection of the commitments in this Policy on the corporate culture and employee behaviours and shares these suggestions with the senior management.

The relevant Group President, who undertakes the project sponsorship in SOCAR Türkiye, leads the execution of business processes and activities in accordance with the commitments set out in this Policy. In addition, the working principles, activities and tasks of this project team are regulated in the Diversity, Equity and Inclusion Project Team Working Principles Guidelines document.

The Human Resources and Corporate Services Department is responsible for the coordination of the work and processes within the scope of this Policy and for the establishment of the Diversity, Equity and Inclusion project team. SOCAR Türkiye employees may consult the Human **Resources and Corporate Services** Department with their questions about this Policy and its implementation. In the event that any third party expected to act in compliance with this Policy violates this Policy, the relevant contracts may be terminated, and other processes may be carried out in accordance with the relevant contract and Organisation documents.



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The Corporate Human Resources Function is responsible for updating, publishing and interpreting this Policy. Suggestions with respect to the updating of this Policy are notified to the Corporate Human Resources Function. The Corporate Human Resources Function reviews this Policy every 2 (two) years according to the suggestions received from employees and stakeholders and the needs for update that may arise as a result of its own evaluations, and makes arrangements on the articles that are deemed necessary to be harmonized.

ETHICS LINE COMMUNICATION CHANNELS

E-mail: etik@socar.com.tr Phone: +90 (212) 305 0250 Address: Levent Postanesi PK: 96 Posta Kutusu & anonymous reporting and complaint boxes in our facilities.

FORCE

This Policy shall enter into force upon approval by the Executive Board of SOCAR Turkey Enerji A.Ş.

