

HUMAN RIGHTS POLICY

Doküman No / Document No	080500-EN
Revizyon No / Revision Number	00
Yürürlük Tarihi / Effective Date	01.10.2024

Hazırlayan / Prepared by	Kontrol Eden / Controlled by	Onaylayan / Approved by
Hukuk ve Uyum Lideri Legal and Compliance Leader TUĞÇE ULUDAĞ	Kalite Sistem Lideri Quality System Leader AYSEL YILDIRIM	Yönetim Kurulu Board of Directors

1. PURPOSE AND SCOPE

This Human Rights Policy (“the **Policy**”) is a guide that reflects KoçMedikal's approach and standards with respect to human rights and demonstrates the importance that KoçMedikal attaches to respect for human rights.

All employees, directors, and officers of KoçMedikal shall comply with this Policy. KoçMedikal expects all Business Partners to act in accordance with this Policy, to the extent applicable to the relevant party and/or transaction and takes the necessary steps to ensure this.

2. DEFINITIONS

“**Business Partner**” includes suppliers, distributors, dealers, authorized services and other third parties with whom KoçMedikal has a business relationship and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of KoçMedikal, as well as their employees, representatives, execution assistants or deputies.

“**Human Rights**” are rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, difference of thought, national or social origin, and wealth. This includes the right to an equal, free, and dignified life, among other human rights.

“**Koç Group**” means Koç Holding A.Ş., companies which are controlled directly or indirectly, jointly, or individually by Koç Holding A.Ş. and the joint venture companies listed in its consolidated financial report.

“**KoçMedikal**”, means Koç Medical B.V., Bıçakçılar Tıbbi Cihazlar Sanayi ve Ticaret A.Ş. and all companies that Bıçakçılar Tıbbi Cihazlar Sanayi ve Ticaret A.Ş. directly or indirectly, individually or jointly are under its control.

“**KoçMedikal Board of Directors**” refers to the members of the board of directors of Bıçakçılar Tıbbi Cihazlar Sanayi ve Ticaret A.Ş.

“**The ILO**” means The International Labor Organization.

“**The ILO Declaration on Fundamental Principles and Rights at Work**”¹ is an ILO declaration adopted that commits all member states whether or not they have ratified the relevant Conventions, to respect, and promote the following four categories of principles and rights in good faith:

- Freedom of association and effective recognition of collective bargaining,
- Elimination of all forms of forced or compulsory labor,
- Abolition of child labor,

¹ <https://www.ilo.org/declaration/lang--en/index.htm>

- Elimination of discrimination in employment and occupation.

“The OECD” means The Organization for Economic Co-operation and Development.

“The OECD Guidelines for Multinational Enterprises”² aims to develop a state-sponsored corporate responsibility behavior that will maintain the balance between competitors in the international market, and thus, increase the contribution of multinational companies to sustainable development.

“The UN” means the United Nations.

“The UN Global Compact”³ is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption.

“The UN Guiding Principles on Business and Human Rights”⁴ is a set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations.

“The Universal Declaration of Human Rights (UDHR)”⁵ is a milestone document in the history of human rights, drafted by representatives with different legal and cultural backgrounds from all regions of the world, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected.

“The Women’s Empowerment Principles”⁶ (WEPs) a set of Principles offering guidance to business on how to promote gender equality and women’s empowerment in the workplace, marketplace, and community. Established by UN Global Compact and UN Women, the WEPs are informed by international labor and human rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women’s empowerment.

“Worst Forms of Child Labor Convention (Convention No. 182)”⁷ means the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labor.

3. GENERAL PRINCIPLES

As a globally acting group, KoçMedikal takes the Universal Declaration of Human Rights (UDHR) as its guide and maintains a respectful understanding of Human Rights for its stakeholders in countries where it operates. Creating and maintaining a positive and professional working environment for its employees is the main principle of KoçMedikal. KoçMedikal acts in compliance with the global ethical principles in subjects such as recruitment, promotion, career development, wage, fringe benefits, and diversity and respects its employees’ rights to form and join organizations of their own choosing. Forced labor and child labor and all forms of discrimination and harassment are expressly prohibited.

KoçMedikal primarily takes into consideration the below mentioned international standards and principles regarding Human Rights:

- The ILO Declaration on Fundamental Principles and Rights at Work (1998),
- The OECD Guidelines for Multinational Enterprises (2011),

² <http://mneguidelines.oecd.org/annualreportsontheguidelines.htm>

³ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

⁴ https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

⁵ <https://www.un.org/en/universal-declaration-human-rights/>

⁶ <https://www.weps.org/about>

⁷ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

- The UN Global Compact (2000),
- The UN Guiding Principles on Business and Human Rights (2011)
- The Women's Empowerment Principles (2011).
- Worst Forms of Child Labor Convention (Convention No. 182), (1999)

4. COMMITMENTS

KoçMedikal respects the rights of its employees, directors, officers, shareholders, Business Partners, and all other individuals affected by its operations, products, or services by fulfilling the principles of the Universal Declaration of Human Rights (UDHR) and the ILO Declaration on Fundamental Principles and Rights at Work.

KoçMedikal is committed to treating all employees in an honest and fair, and providing a safe and healthy working environment that respects human dignity while avoiding discrimination.

KoçMedikal may also apply additional standards considering vulnerable and disadvantaged groups who are more open to the negative human rights impacts and require particular attention. KoçMedikal considers the specific circumstances of groups whose rights are further elaborated by United Nations instruments: indigenous peoples; women; ethnic, religious, and linguistic minorities; children; persons with disabilities; and migrant workers and their families, as indicated in the UN Guiding Principles on Business and Human Rights.

Diversity and Equal Recruitment Opportunities

KoçMedikal is committed to employing people from diverse cultures, professional experiences, and backgrounds. Recruitment decisions are based on job requirements and personal qualifications regardless of race, religion, nationality, gender, age, marital status, or disability.

Non-Discrimination

Zero tolerance towards discrimination is a key principle in the entire employment process, including promotion, assignment, and training. KoçMedikal expects all its employees to show the same sensitivity in their behavior towards each other.

KoçMedikal strives to treat its employees equally by providing equal rights and opportunities. All forms of discrimination and disrespect based on race, gender, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition or political opinion are unacceptable.

Zero Tolerance to Child and Forced Labor

KoçMedikal strongly opposes child labor, which causes children's physical and psychological harm to children, and interferes with their right to education. In addition, KoçMedikal opposes all forms of forced labor, which is defined as work that is performed involuntarily and under the threat of any penalty.

In accordance with the conventions and recommendations of the ILO, the Universal Declaration of Human Rights, and the UN Global Compact, KoçMedikal has a zero-tolerance policy towards slavery and human trafficking and expects all its Business Partners to act accordingly.

Freedom of Association and Collective Bargaining

KoçMedikal respects the right and freedom of choice of its employees to join a trade union, and to bargain collectively without fear of retaliation. KoçMedikal is committed to a constructive dialogue with the freely chosen representatives of its employees, represented by a legally recognized trade union.

Health and Safety

Protecting the health and safety of employees, and other persons who are present in a work area for any reason is one of the main concerns of KoçMedikal companies. KoçMedikal provides a safe and healthy working environment. KoçMedikal companies take the necessary safety measures in the workplace in a manner that respects the dignity, privacy, and reputation of each individual. KoçMedikal complies with all relevant regulations and implements all necessary safety measures in all its work areas.

If any unsafe conditions or unsafe behavior are detected in the work areas, KoçMedikal companies shall immediately take the necessary measures to ensure the health, safety, and security of their customers and employees.

KoçMedikal and its contractor's employees, in accordance with the legal requirements of especially the Republic of Turkey and the countries of operations, and the Koç Holding and KoçMedikal Standards:

- Have the right to refuse and cease any work that they consider unsafe. None of the KoçMedikal or contractor employees can be questioned for this action.
- Can freely convey their thoughts and suggestions regarding Occupational Health and Safety (OHS) to the management individually or through designated methods (OHS Board, observation cards, in-house communication channels, Stakeholder Communication Management system, etc.)
- Can access risk assessments regarding the activities they carry out and the environments they work in.
- Are equipped with Personal Protective Equipment suitable for their work and working conditions, and this equipment is replaced periodically or in case of detection of a decrease in the protection performance.
- Are periodically informed about KoçMedikal OHS performance, work accident statistics, preventive and regulatory measures.

Zero Tolerance Harassment or Violence

A key aspect of protecting the personal dignity of employees is ensuring that harassment or violence does not occur or, if it does occur, sanctioned adequately. KoçMedikal is committed to providing a workplace free from violence, harassment, and other unsafe or disturbing conditions. As such, KoçMedikal does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats.

Working Hours and Remuneration

KoçMedikal complies with the legal working hours in line with the local regulations of the countries where it operates. It is crucial that employees have regular breaks, vacations, and establish an efficient work-life balance, as a minimum, in respect of the legal requirements.

The wage determination process is established in a competitive manner according to the relevant sectors and the local labor market, and in accordance with the terms of collective bargaining agreements if applicable. All compensations, including social benefits, are paid in accordance with the applicable laws and regulations.

Employees may request further information from the Legal and Compliance Department regarding the laws and regulations that regulate working conditions in their own countries if they wish so.

Personal Development

KoçMedikal provides its employees with opportunities to develop their talents and potential, and to enhance their skills. Considering human capital as a valuable resource, KoçMedikal strives for the comprehensive personal development of its employees by supporting them with internal and external training.

Data Privacy

In order to protect the personal data of its employees, KoçMedikal maintains high data protection standards. The data protection standards are implemented in accordance with the relevant legislation.

KoçMedikal expects its employees to comply with the data protection laws of each of the country in which it operates.

Political Activities

KoçMedikal respects the legal and voluntary political participation of its employees. Employees may make personal donations to a political party or a political candidate or engage in political activities outside working hours. However, it is strictly forbidden to use company funds or other resources for such donations or any other political activities.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of KoçMedikal are responsible for complying with this Policy, implementing, and supporting the relevant KoçMedikal company's procedures and controls in accordance with the requirements of this Policy. Each KoçMedikal company also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable, comply with and/or act in accordance with this Policy.

If there is a discrepancy between the local regulations, applicable in the countries where KoçMedikal operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations.

If you become aware of any action that you believe is inconsistent with this Policy, the applicable law, KoçMedikal Code of Ethics, you may seek guidance or report the incident to your line manager or Internal Audit Department or Legal and Compliance Department. Alternatively, notifications to the Ethics Hotline can be made via the following link: "koc.com.tr/hotline".

KoçMedikal employees may contact the Human Resources Department of Koç Holding for their questions regarding this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

6. EFFECTIVE DATE

This Policy takes effect on 01.10.2024 as of the date approved by the KoçMedikal Board of Directors and Legal and Compliance Department is responsible for updates of this Policy.