

**KLİMASAN CORPORATE SOCIAL
COMPLIANCE POLICY**

Document No:	KEYS-POL-03
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Our Corporate Social Compliance Policy has been prepared to share with all our stakeholders our clear commitment that, as a company acting with the principle of *adding value to the future* and the responsibility we feel towards our stakeholders—and as a signatory of the UN Global Compact—we will fulfill all responsibilities incumbent upon us in teamwork with all our business partners.

Our goal is to ensure that the Social Compliance Policy becomes an integral part of the company culture. For this reason, social compliance standards have been established and implemented. The Social Compliance Policy is communicated to all employees and other stakeholders through various communication channels (website, email groups, bulletin boards, Sustainability Report, QMS announcements, etc.). Stakeholders are informed through our official website, and these criteria are integrated into the evaluation processes of our suppliers.

Within the scope of this policy, employees can openly express any opinions, requests, concerns, worries, complaints, or suggestions. These are evaluated by Top Management, and necessary improvement actions are taken for areas identified as needing development.

Our Social Compliance Policy is supported by the Klimasan Code of Conduct document and is prepared in alignment with the content and scope of the periodic Sedex Social Compliance Audits. In addition, our Human Resources Policy and Procedure Manual has been used as a fundamental reference.

Our status as a signatory of the UN Global Compact, which also reflects our understanding of social compliance and social responsibility, and our collaborative work with UN Global Compact Türkiye are also formally committed to through this policy.

This policy refers to our contribution and support for the following Sustainable Development Goals (SDGs):

- SDG 3: Good Health and Well-being
- SDG 4: Quality Education
- SDG 5: Gender Equality
- SDG 8: Decent Work and Economic Growth
- SDG 10: Reduced Inequalities
- SDG 13: Climate Action
- SDG 16: Peace, Justice and Strong Institutions

The Klimasan Corporate Social Compliance Policy covers the following topics:

1. Ethical Business Conduct
2. Equal Treatment (Prevention of Discrimination)
3. Voluntary Employment (Prevention of Forced Labor)
4. Legal Employment Age (Prevention of Child Labor)
5. Working Hours and Compensation
6. Occupational Health and Safety
7. Respect for Freedom of Association and Collective Bargaining
8. Suggestion, Complaint and Feedback Mechanisms
9. Rest Days and Holidays
10. Recruitment and Employment

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11. Employment Contracts (Employer Agreements)
12. Employment of Foreign Workers
13. Prevention of Discipline, Harassment and Ill-treatment
14. Environmental Protection
15. Stakeholder Communication and Transparency

All principles contained in this policy are implemented with the necessary regulatory adjustments. Legal regulations are closely followed to ensure the policy remains up to date.

1. Ethical Business Behavior

Business ethics refers to standards of behavior that guide how individuals should act in the workplace based on moral values and rules. It includes the ability to distinguish right from wrong and the commitment to do what is right. Our institution does not tolerate any form of corruption, fraud, bribery, or embezzlement. To enable employees to report illegal, immoral, or unethical issues within the company, the KEYS-KP-009 Whistleblower Notification Procedure has been established, allowing notifications via email or phone. This procedure is also shared with stakeholders through our official website.

The Klimasan Audit Committee reviews the company's compliance with its code of business conduct and ethics, evaluates fraud risk, and ensures that training on misconduct and ethical rules is provided. In support of the practical implementation of the Code of Ethics, an Ethics Hotline has been established that operates confidentially and is accessible to employees. This channel enables employees to anonymously report ethical concerns to the company through the Internal Audit Department, which functions independently and reports directly to the Audit Committee on behalf of the Board of Directors.

To prevent ethical violations, all employees receive Business Ethics Awareness Training annually, and the necessary documentation is regularly updated.

Klimasan's understanding of ethical business is detailed in the Klimasan Code of Conduct and Principles of Implementation Document.

2. Equal Opportunity Approach (Prevention of Discrimination)

At Klimasan, we are firmly committed to combating discrimination and ensuring equal opportunity. Our processes are maintained in a manner free of discrimination or physical/verbal abuse based on race, gender, color, nationality, social origin, religion, age, disability, sexual orientation, marital, social or economic status, pregnancy or military service, union activity or membership, political opinion, or any status protected by applicable law. Mechanisms to prevent discrimination are integrated into our processes.

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Recruitment is based on objective qualifications such as education, skills, work experience, job relevance, areas of interest, and personality inventory results. With the awareness that equal opportunity is a foundation of social sustainability, we provide equal rights to all employees in areas such as freedom of expression, compensation, performance evaluation, and employment.

We are committed to ensuring gender equality in the workplace, increasing the employment of women, valuing and accepting religious, structural, and cultural differences, and complying with anti-bribery and anti-corruption laws, ethical and professional principles, and universal standards. All our fair business processes are monitored through Social Compliance Audits and shared with our stakeholders, especially customers.

3. Voluntary Labor (Prevention of Forced Labor)

Our company does not engage in forced labor of any kind. Employment is based on free will, not debt or contractual obligation. Employees are free to leave the company unless there is a legitimate security concern, and the company will not hinder or delay their departure. All employee information is protected and handled in accordance with applicable data protection laws. We expect the same ethical conduct from all our supply chain partners.

4. Providing Underage Employment (Prevention of Child Labor)

We act in compliance with the legal and ethical standards concerning the employment of minors and young workers. No individuals below the legal minimum age are employed under any circumstances. Child labor is not tolerated within our organization or value chain. Except for mandatory internships, the minimum legal age set by national and international laws is respected.

Suppliers are expected to act with the same legal and ethical sensitivity. Employment risks and social compliance status of suppliers are assessed through site inspections, feedback, reports, and documentation. These factors are also criteria in supplier selection and evaluation.

5. Working Hours and Wages

Working hours are determined in accordance with current legal obligations. Overtime is within the legal weekly and annual limits and complies with customer standards. Overtime pay is calculated based on legal premium rates. Our wage practices, working hours, overtime, and fringe benefits fully comply with applicable laws and employment contracts.

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6. Occupational Health and Safety

We ensure and maintain a safe and healthy workplace environment. Our company aims to create and sustain a work environment where employees can work safely, healthily, and productively by minimizing risks of accidents, injuries, and physical/psychological threats.

All health and safety regulations required by law are strictly followed across the organization. All requirements of the ISO 45001 Occupational Health and Safety Management System are implemented in every stage of operations. Periodic surveillance and certificate renewal audits ensure continuity and improvement of the management system.

7. Respect for Freedom of Association and Representation

We recognize all constitutional and internationally recognized rights of employees to organize, join unions, and engage in collective bargaining. Employees are granted the freedom to be represented through elected representatives in a free and democratic manner.

8. Communication of Suggestions, Requests, and Complaints

We have established mechanisms that allow every employee to express suggestions, wishes, and complaints. These are evaluated in a timely and effective manner without any retaliation against the employee.

Through the **Klimasan Suggestion Evaluation System**, technical and administrative suggestions are received under the leadership of the Quality Management System (QMS) Department and evaluated by the Suggestion Evaluation Board. Awarded projects and ideas are implemented based on monthly evaluations.

Employees can also use Suggestion/Complaint Boxes to submit anonymous feedback. The Human Resources Department manages the process and takes necessary actions based on evaluations.

9. Rest Days and Holidays

Employees use their legal rest and vacation days as per regulations. Working days may vary depending on the nature of the job.

10. Recruitment and Employment

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Recruitment and placement activities are conducted by the Human Resources Department. Open positions are determined according to annual business plans and budgets. The recruitment process is conducted fairly, ensuring legal rights and equal opportunities, including equal pay for equal work.

Employee career management, training and development, and performance evaluation are managed by the HR Department.

11. Employment Contracts

An “Indefinite-Term Employment Contract” or, where necessary, a “Fixed-Term Employment Contract” is signed between our institution and the new employee. The contract reflects workplace and legal requirements and is signed by the employee along with all necessary documents. A copy of the contract is provided to the employee, and orientation training is conducted to communicate all relevant rules and practices.

12. Employment of Foreign Nationals

All legal rights of foreign employees are protected. From onboarding to offboarding, personnel processes are conducted in compliance with applicable legal regulations. In line with our equal opportunity approach, all foreign employees are granted equal and fair rights, without any discrimination based on religion, language, race, status, orientation, or gender.

13. Prevention of Discipline, Harassment, and Ill-Treatment

We are committed to a peaceful work environment and the dignity and happiness of our employees. We do not tolerate any form of punishment, verbal/physical/psychological harassment, pressure, threat, or coercion. Disciplinary actions are implemented according to the TAL-IKY-004 Disciplinary Committee Directive.

We maintain a workplace free from violence, threats, abuse, or distress. Necessary measures are taken to ensure continuity, and our Disciplinary Committee actively supports this effort.

14. Protection Of The Environment

All potential environmental impacts arising from our activities are managed with a strong sense of responsibility. We comply with applicable environmental laws and customer standards, prevent pollution through environmental impact assessments, and implement zero waste and effective energy management

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practices. We aim to continuously improve our current performance by making environmental protection part of our corporate culture.

The ISO 50001 Energy Management System is applied in all operational and administrative processes, led by the Energy Management Representative, Energy Committee, and QMS Department. Our environmental impact is monitored via periodic emissions and carbon footprint measurements, and continuous improvement goals are set. Our Sustainability Report, published annually, shares environmental progress with stakeholders.

Our corporate sustainability vision guides all operational and administrative activities and enables collaborative environmental partnerships with associations and organizations we engage with.

15. Stakeholder Communication and Transparency

Klimasan commits to building relationships with stakeholders based on goodwill. We act fairly and ethically, maintaining equal distance with all stakeholders.

We are committed to providing accurate, timely, and relevant information to stakeholders, regularly analyzing their feedback and expectations, incorporating those into our goals and plans, and fulfilling our responsibilities as a publicly traded company.

We ensure transparent stakeholder communication through dedicated platforms and methods. Social compliance declarations are collected from our suppliers. Their capacities are assessed through Corporate Social Compliance and Sustainability Surveys, tracked through action plans, and targeted for continuous improvement.

We also enable stakeholder participation in our Sustainability Management. Since 2020, we have been sharing all related activities with stakeholders through our annual Sustainability Report.

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