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Our company, which acts with the principle of adding value to the future and the responsibility we feel for our stakeholders and has signed the Global Compact; Our Corporate Social Compliance Policy has been prepared to share with all our stakeholders a clear commitment that it will fulfill all its responsibilities by carrying out all its responsibilities in the form of teamwork with all our business partners.

Our goal is to ensure that the Social Compliance Policy becomes a company culture within the organization. For this reason, social compliance standards have been established and started to be implemented. The Social Compliance Policy is announced to all our employees and other stakeholders through communication channels (internet, e-mail group, notice boards, Sustainability Report, QMS announcements, etc.), our 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 all kinds of opinions, requests, concerns, concerns, complaints and suggestions, and these are evaluated by the Senior Management and necessary improvement activities are carried out for areas open to improvement.

Our Social Compliance Policy; Supported by the Klimasan Code of Conduct Document; in addition, it has been prepared in accordance with the subject and scope of the Sedex Social Compliance Audit, which is periodically subjected. In addition, the Human Resources Policy and Procedure Handbook is taken as a reference.

The continuity of our being a signatory organization of the UN Global Compact Global Compact, which is another indicator of our understanding of Social Compliance and Social Responsibility, and the continuity of our cooperation with UN Global Compact Turkey, in which we have a common denominator, has also been committed with this policy.

\*With this policy, our contribution and support activities to the following Sustainable Development Goals are mentioned;

- 3 Healthy Individuals
- 4 Quality Education
- 5 Gender Equality
- 8 Decent Work and Economic Growth
- 10 Reducing Inequalities

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- 13 Climate Action
- 16 Peace, Justice, and Strong Institutions

Klimasan Corporate Social Compliance Policy covers the following topics:

- 1. Ethical Business Conduct
- 2. Egalitarian Approach (Prevention of Discrimination)
- 3. Voluntary Work (Prevention of Forced Labor)
- 4. Providing Employment of Legal Age (Prevention of Child Labor)
- 5. Working Hours and Wages
- 6. Occupational Health and Safety
- 7. Respect for Freedom of Association and Representation
- 8. Submission of Suggestions, Wishes and Complaints
- 9. Rest Days and Holidays
- 10. Recruitment and Employment
- 11. Employment Contract (Employer Contract)
- 12. Providing Employment for Foreign Employees
- 13. Discipline, Prevention of Harassment and Ill-Treatment
- 14. Environmental Protection
- 15. Stakeholder Communication and Transparency

All the principles in this policy are implemented with the necessary regulations, legal regulations are followed and the up-to-dateness of the policy is ensured.

### 1. Ethical Business Conduct

Business ethics are standards of behavior that indicate how an individual should behave in the workplace based on moral values and rules. It involves the ability to distinguish between right and wrong and a commitment to doing what is right. Our institution does not tolerate any form of corruption, fraud, bribery or embezzlement. KEYS-KP-009 Notice Notification Procedure has been prepared for the violation notifications of the employees on illegal, immoral or unethical issues within the company, and the employees have been given the opportunity to notify by e-mail and phone, and the relevant procedure has also been shared with its stakeholders on the official website.

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Klimasan Audit Committee reviews the Company's compliance with the business code of conduct and ethical rules, fraud risk assessments, fraud and business code of conduct and ethical rule training. In addition, in order to support the practical operation of the Business Ethics Regulation implemented in our company, an "Ethics Hotline" has been established that is accessible to company employees and works with the principle of confidentiality. The Ethics Hotline allows employees to convey their concerns and complaints about ethical issues concerning the company to the company through the Internal Audit Department, which operates independently and operates on behalf of the Board of Directors and reports directly to the Audit Committee.

In order to prevent business ethics violations, Business Ethics Awareness Training is given to all employees every year and the necessary documentation is kept up-to-date.

Klimasan Ethical Business Approach is detailed in the Klimasan Code of Ethical Conduct and Implementation Principles Document.

## 2. Egalitarian Approach (Prevention of Discrimination)

As Klimasan A.Ş., we have a deep-rooted commitment to take a stance against discrimination and to ensure equal opportunities. It maintains its processes as an institution where there is no discrimination or physical or verbal abuse on the basis of race, sex, color, nationality, social origin, religion, age, disability, sexual orientation, marital, social or economic status, pregnancy or military service status, participation and membership in trade union activities, political opinion or any other value protected by applicable law. It has also integrated mechanisms to prevent discrimination into its processes. Employee selection for our company is made on the basis of minimum qualifications such as education, talent, work experience, open position, interests, personality inventory results.

With the awareness that equal opportunity is one of the foundations of social sustainability, we accept the basic principle of providing equal rights to all our employees in matters such as free expression, remuneration, performance evaluation and employment by not allowing discrimination among our employees and stakeholders under any circumstances. In this direction; We are committed to providing equal opportunities for women in the business environment and increasing our women's employment, to see, accept and value the religious, structural or cultural differences of all our stakeholders, to comply with anti-bribery and anti-corruption laws and regulations, ethical and professional principles and universal rules.

All our fair business processes are checked with Social Compliance Audits and are also shared with our stakeholders, especially our customers, through communication channels.

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### 3. Voluntary Work (Prevention of Forced Labor)

Our company does not employ any employee. The working principles in our company are based on the principle that work cannot be done under contract or against debt and that the work will be voluntary. If the employee quits the job, the company does not prevent or postpone it, except for any security reasons. All kinds of information of our employees are protected and kept confidential to the extent specified by law. The same attitude is expected from all our stakeholders who make up our supply chain.

### 4. Providing Adult Employment (Prevention of Child Labor)

Within the framework of the protection of children from all kinds of abuse, their healthy development and institutional respect for the right to education, no one under the legal minimum age limit is hired by acting in accordance with the procedures and principles of employing child and young workers. In no way is child labour acceptable within the organisation and in the value chain. Except for compulsory cases such as internships, the minimum age determined by national and international laws is taken into account. In addition, our stakeholders who make up our supply chain are expected to act with the same sensitivity and legal compliance. As one of the criteria for selecting and evaluating suppliers; Any illegal employment risk and social compliance status of our suppliers is audited through on-site audits, feedback, reports and documentation.

#### 4.1 Child Labour Improvement

Child labor is strictly not accepted at Klimasan. However, if any child labor case is detected, the following steps are taken:

##### 4.1.1 Preventive Controls in the Recruitment Process

- Identity and age verification of all personnel is done by Human Resources during the recruitment phase.
- **Within the scope of IKY-175 Employment Document Checklist,** the following documents are requested from employees:
  - Certified Population Registration Sample
  - Photocopy of Identity Card (4 pieces)
  - Prosecutor's Office Good Conduct Paper (E-Government, Judicial Authority)

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- Age control is made over the dates of birth in these documents. People under the legal minimum age limit are definitely not employed.

**4.1.2 Detection and Notification**

- If child labour is detected on the factory site, the person concerned is immediately removed from the site in a safe and respectful manner.
- The incident is reported to the Human Resources Directorate and recorded.

**4.1.3 Subcontracted Situations**

- If the child worker is employed through a subcontractor, a written notification is made to the relevant subcontractor.
- In case of repetition, the employment relationship with the subcontractor in question is terminated.

**4.1.4 Referral to Education and Communication with Family**

- The child is directed to continue his/her education.
- The best interests of the child are taken into account by communicating with the family.
- When necessary, cooperation is made with official institutions such as the Directorate of National Education and Social Services.

**4.1.5 Support and Information**

- Necessary information is provided to the family and subcontractor so that child workers are not re-employed.
- In order to support the education of the child, **the necessary support is provided by applying for funds within the scope** of the TAL-İKY-034 Family Support Fund Instruction.
- Additional support mechanisms within the framework of social responsibility can also be evaluated to prevent the family from experiencing victimization.

**4.1.6 Recording and Monitoring**

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- The whole process is recorded in writing.
- Regular follow-up is carried out by Human Resources and presented as evidence in audits.

## 5. Working Hours and Wages

Working hours are determined in accordance with applicable laws and obligations, and comply with weekly and annual overtime limits and customer standards specified by law. The overtime wage is calculated and paid from the increased wage specified by the law; In our practices, wages, working hours, overtime and fringe benefits are carried out in full compliance with applicable laws and employment contracts.

## 6. Occupational Health and Safety

Our company ensures the creation and protection of a safe and healthy workplace environment. The company aims to ensure the continuity of our employees by minimizing the risk of accidents, injuries and exposure to all kinds of factors that threaten physical/psychological health, and by creating a work environment where they can work safely, healthily and efficiently. All occupational health and safety rules regulated by the legal legislation are adhered to in all disciplines of the enterprise. All requirements of the ISO 45001 Occupational Health and Safety Management System are implemented at all stages of the organization. Continuity and improvements of the management system are ensured through periodic surveillance and document renewal audits.

## 7. Respect for Freedom of Association and Representation

All fundamental rights of our employees arising from all constitutional and international agreements, such as organization, unionization and collective bargaining, are recognized, and the right to free and democratic representation through employee representatives is respected.

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## 8. Submission of Suggestions, Wishes and Complaints

Methods have been established for each employee to convey their suggestions, wishes and complaints, timely and effective evaluation and feedback are made, and no retaliation is made against the employee's wishes and complaints.

With the Klimasan Suggestion Evaluation System, the technical and administrative suggestions of all employees are received under the leadership of the QMS Department and evaluated by the Suggestion Evaluation Board. As a result of the monthly evaluation, the winning projects and ideas are rewarded and action is taken to put them into practice.

With the Wish/Complaint Boxes within the company, the personnel can express their wishes and complaints anonymously, and relevant actions are taken for the issues that are evaluated under the management of the Human Resources Department.

## 9. Rest Days and Holidays

Our employees use their rest and holidays within the framework of their legal rights. Working days differ according to the nature of the job.

## 10. Recruitment and Employment

Recruitment and placement activities in our company are carried out by the Human Resources department. The open positions determined within the scope of the budget created in line with the annual business plans and targets are employed in accordance with the law and within the framework of certain rules, in line with the egalitarian approach, legal rights and permissions, fair fringe benefits and opportunities, and in line with the equal work equal pay policy. Career management, training and development processes, and performance evaluations of the employed personnel are carried out by the Human Resources Department.

## 11. Employment Contract (Employer Contracts)

An "Indefinite Term Employment Contract" or a "Definite Term Employment Contract" is prepared between our institution and the person to be employed, in accordance with the workplace and the law and containing the conditions offered to the candidate employee. The employee who accepts to start working is made to sign the contract and the documents required by the job/institution. A copy of the employment contract is given to the employee in return for signature, and all the rules and practices required by our institution and the job are conveyed to the relevant employee with orientation training.

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**12. Providing Employment for Foreign Employees**

The legal rights of foreign employees to work in our company are protected. For foreign employees who are/will be employed in accordance with the law, all personnel transactions from the recruitment to the termination process are carried out in accordance with the applicable legal legislation and regulations. Within the scope of our egalitarian approach, all foreign employees are recognized and observed with equal and fair rights, regardless of any religion, language, race, status, orientation or gender.

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

To take the peace of the working environment and the happiness of the employees as a basis; to respect the dignity and personality of employees, not to engage in institutional punishment; not to allow verbal, physical, psychological harassment, pressure, threat or coercion; In order to ensure disciplined work, the disciplinary rules determined by the "TAL-IKY-004 Disciplinary Board Instruction" are applied by our institution. All our employees carry out their work in accordance with the working rules instructions. In our institution, a workplace environment free of violence, threats, abuse and disturbing conditions has been provided and all necessary actions are taken for its continuity and all necessary studies are carried out with our Disciplinary Board for the continuity of these studies.

**14. Environmental Protection**

Our environmental impacts that may arise from all our activities are managed with a sense of responsibility. Studies are carried out to continuously improve our current situation by making it a corporate culture to comply with the current environmental legislation and customer standards, to prevent environmental pollution based on environmental dimensions and impact assessment, to reduce pollution with an effective zero waste management, as well as to protect natural resources and reduce negative impacts on the environment with an effective energy management.

All requirements of the ISO 50001 Energy Management System are implemented and monitored in all administrative and operational processes under the leadership of the Energy Management Representative, Energy Board and QMS Department. Our environmental impacts are monitored with periodic emission and carbon footprint measurements and continuous improvement targets are set. With the annual Sustainability Report, our environmental development is reported to all our stakeholders.

Our Corporate Sustainability Approach guides all our operational and administrative activities and enables new collaborations with common purposes. We serve to ensure environmental sustainability with the associations, organizations and organizations we cooperate with.

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## 15. Stakeholder Communication and Transparency

Klimasan A.Ş. undertakes to establish ties with its stakeholders on the basis of goodwill. It acts fairly and equally towards all its stakeholders, observing all ethical business behaviors. As Klimasan A.Ş., we aim to provide accurate, timely and necessary information to all our stakeholders and to regularly analyze the opinions and expectations of our stakeholders; In this direction, we consider it among our corporate responsibilities to determine our plans, risks, opportunities and goals, to include them in our work and to implement the requirements of being a public company.

A transparent stakeholder communication is committed to appropriate communication platforms and communication methods prepared for all our stakeholders.

Social compliance commitments of the supplier companies from which we receive products/services are obtained, their capacities are measured with the Corporate Social Compliance and Sustainability Survey, the results are monitored with action plans and it is aimed to gradually increase their social compliance levels.

In addition, our stakeholders are allowed to participate in our Sustainability Management; As of 2020, all our activities related to the Sustainability Report, which we plan to publish every year, are shared with our stakeholders.

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