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OPET

HUMAN RIGHTS POLICY

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1. Purpose and Scope

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

All employees and managers of Opet shall comply with this Policy. Opet expects and takes the necessary steps to ensure that all its Business Partners - to the extent applicable - comply with and/or act in accordance with this Policy.

This policy has been prepared in accordance with the Code of Ethics and Values of Opet's Principal Shareholders¹.

2. Definitions

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

“**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.

“**Opet**” means all companies controlled solely or jointly by Opet Petrolcülük A.Ş. and Opet Petrolcülük A.Ş., either directly or indirectly by holding 50% or more than 50% of their shares.

“**Principal Shareholders**” refers to Türkiye Petrol Rafinerileri A.Ş. and Öztürk Yatırım ve Turizm A.Ş.

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

“**The ILO Declaration on Fundamental Principles and Rights at Work**”² is a 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,
- Elimination of discrimination in employment and occupation.

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

“**The OECD Guidelines for Multinational Enterprises**”³ 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**”⁴ 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**”⁵ 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)**”⁶ is a milestone document in the history of human

¹ For detailed information you may review Opet Code of Ethics.

² <https://www.ilo.org/declaration/lang--en/index.htm>

³ <http://mneguidelines.oecd.org/annualreportsontheguidelines.htm>

⁴ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

⁵ https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

⁶ <https://www.un.org/en/universal-declaration-human-rights/>

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”⁷ (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 Labour Convention (Convention No. 182)”⁸ means the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour.

3. General Principles

As a globally acting establishment, Opet is guided by the Universal Declaration of Human Rights (UDHR) and maintains a respectful understanding of Human Rights for its stakeholders in the countries where it operates. Creating and maintaining a positive and professional working environment for its employees is the main principle of Opet. Opet acts in compliance with global ethical principles in areas such as recruitment, promotion, career development, wages, benefits and diversity, and respects the rights of its employees to form and join organizations of their choice. Forced and child labor as well as all forms of discrimination and harassment are expressly prohibited.

Opet primarily adheres to following international human rights standards and principles:

- The ILO Declaration on Fundamental Principles and Rights at Work (1998),
- The OECD Guidelines for Multinational Enterprises (2011),
- 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 Labour Convention (Convention No. 182), (1999)

4. Commitments

Opet respects the rights of its employees, shareholders, Business Partners, customers, and any other individuals affected by its operations, products or services by complying with the principles of the Universal Declaration of Human Rights (UDHR) and the ILO Declaration on Fundamental Principles and Rights at Work.

Opet undertakes to treat all employees in a honest and fair manner, and to provide a safe and healthy working environment that respects human dignity while avoiding discrimination.

Opet may also apply additional standards considering vulnerable and disadvantaged groups that are more susceptible to negative Human Rights impacts and require special attention. Opet considers the specific circumstances of groups whose rights are further elaborated in 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.

⁷ <https://www.weeps.org/about>

⁸ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

4.1. Diversity and Equal Recruitment Opportunities

Opet 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.

4.2. Non-Discrimination

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

Opet 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.

4.3. Zero Tolerance to Child and Forced Labor

Opet strongly opposes child labor, which causes children's physical and psychological harm to children, and interferes with their right to education. In addition, Opet 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, Opet has a zero-tolerance policy towards slavery and human trafficking and expects all its Business Partners to act accordingly.

4.4. Freedom of Association and Collective Bargaining

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

4.5. 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 Opet companies. Opet provides a safe and healthy working environment. Opet companies take the necessary safety measures in the workplace in a manner that respects the dignity, privacy, and reputation of each individual. Opet 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, Opet companies shall immediately take the necessary measures to ensure the health, safety, and security of their customers and employees.

4.6. 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, is sanctioned adequately. Opet is committed to providing a workplace free from violence, harassment, and other unsafe or disturbing conditions. As such, Opet does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats.

4.7. Working Hours and Remuneration

Opet complies with the legal working hours in accordance with the local regulations of the countries where it operates. It is important for employees to have regular breaks, vacations, and an effective work-life balance.

Wages are determined in a competitive manner according to the relevant sectors and the local labor market, and where applicable, in accordance with the terms of collective bargaining agreements if applicable. All compensation, including social benefits, is paid in accordance with the applicable laws and regulations.

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

4.8. Personal Development

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

4.9. Data Privacy

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

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

4.10. Political Activities

Opet 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 managers of Opet are responsible for complying with this Policy, implementing and supporting the relevant Opet's procedures and controls in accordance with the requirements of this Policy. Opet 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 Opet 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 or Opet Code of Ethics, you may seek guidance from your line manager or contact Opet People and Culture Leadership. Alternatively, you may report the incident to Koç Holding's Ethics Hotline, which is managed by independents

service providers and operates 24/7, by calling 0850-577-1926 and 0850-220-3845⁹, or via the web-based reporting system at: “koc.com.tr/hotline”

Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties that are expected to act in compliance with this Policy, their contracts may be terminated.

6. Revision History

This Policy entered into force with the Board of Directors’ Resolution dated 15.04.2022, and Opet People and Culture Leadership is responsible for updating the Policy.

Revision	Date	Comment
No:1	10.06.2024	The definition of “Business Partners” and the name of the Legal and Compliance Group Directorate has been revised.
No:2	12.05.2026	Unit names have been revised.

⁹ Information on phone numbers, the countries covered, and the languages in which services are provided is available at ‘koc.com.tr/ihbarbildirim’.