

DRAAKON GROUP A.Ş.
HUMAN RIGHTS POLICY

As Draakon Group A.Ş., we attach great importance to the observance of human rights in all our activities carried out with a sustainable development perspective. We adopt an approach that respects human rights for all our stakeholders, primarily our employees, and aim to promote respect for human rights within society. In this context, we aim to provide a respectful, equal, inclusive, and fair working environment for our employees. Within our company, we offer equal opportunities to all employees regardless of race, language, age, gender, religion, ethnic origin, or any other personal characteristic.

With this Human Rights Policy, Draakon Group adopts the principles outlined below as a general framework:

- Acting with the awareness that human beings are our most asset,
- Acting in compliance with applicable national and international legislation and standards regarding working conditions in all sectors, both domestically and internationally,
- While aiming to respect human rights and provide a decent working environment, taking the necessary measures to ensure a healthy and safe working environment for employees,
- Acting in compliance with relevant local legislation and international agreements to which Türkiye is a party regarding forced labour and child labour,
- Respecting diversity by mutually accepting our differences,
- Providing fair and appropriate remuneration and benefits to our employees,
- Creating efficient working and employment conditions that enable our employees to transfer their knowledge, skills, competencies, and experience in line with the objectives of our company, while respecting their expertise and experience,
- Prioritizing the development of employees at all levels within the scope of the “continuous training and development” approach, in line with the company’s goals and strategies, and continuously “investing in people,”

- Not engaging in discrimination and applying necessary sanctions against discriminatory practices within the framework of transparency and fairness in recruitment, promotion, compensation, benefits, training, and all other employment-related processes, based on race, language, religion, religious belief, sect, ethnic origin, age, position, gender, gender identity, sexual orientation, colour, physical characteristics, country of birth, marital status, pregnancy, dependents, disability, social class, trade union membership, or political opinion,
- Adopting a transparent and open management policy to ensure reliable and effective interaction,
- Adopting a zero-tolerance approach toward all forms of verbal, physical, psychological, sexual, and/or emotional harassment, and providing an appropriate environment that enables employees to report such situations by exercising their right to freedom of expression,
- Ensuring that our subcontractors and suppliers act in compliance with human rights and taking the necessary actions when any violation of human rights is identified,
- Respecting the rights of communities in the regions where we operate, making efforts to minimize negative impacts on their lives, supporting stakeholder engagement, establishing long-term relationships and considering the expectations of all our stakeholders.

Purpose of the Policy

The purpose of this policy is to set forth the principles for complying with all relevant standards within the framework of the decent work approach for all stakeholders, primarily our employees, acting in accordance with national and international legislation and standards, and continuously improving our practices in this field.

Scope of the Policy

This policy covers our employees, subcontractors, suppliers and the local communities in the regions where we operate.

Implementation of the Policy and Applicable Legislation

This policy has been established by concretizing and regulating the rules set forth under applicable legislation within the scope of Draakon Group practices. In this context, all relevant regulations shall primarily apply, including but not limited to the Law on the Human Rights and Equality Institution of Türkiye, the Law on the Human Rights Inquiry Commission, the Occupational Health and Safety Law, and the United Nations Human Rights Convention. In the event of any inconsistency between the applicable legislation and this policy, Draakon Group accepts that the provisions of the applicable legislation shall prevail.

Entry into Force of the Policy

This policy is reviewed periodically and updated when deemed necessary. The Corporate Governance and Sustainability Directorate is responsible for updating the policy.

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CEO