



Nuh Çimento Group Human Rights Policy

1. Purpose and Scope

Nuh Cement Group operates in different geographies with its efficiency and sustainability-oriented approach. It adopts an understanding that respects human rights for its employees and all stakeholders with whom it has business relations in the countries in which it operates, and aims to observe basic human rights throughout the society. Nuh Çimento Group's Human Rights Policy has been established in accordance with the United Nations Global Compact.

1.1 The Universal Declaration of Human Rights and International Labor Organization (ILO) Conventions, United Nations Global Compact, United Nations Business and Human Rights Principles, OECD's Guidelines for Multinational Enterprises form the basis of the policy .

1.2 The policy covers primarily employees, business partners, and suppliers. Nuh Çimento Group conveys the rules specified in the Policy to its employees in annual trainings. In order to encourage its employees as well as its business partners and suppliers to act in accordance with the principles in this Policy , it informs the Policy and includes it in the contracts.

2. Principle, Commitment and Related Practices

Within the scope of the policy, Nuh Cement Group;

2.1 Respect for Human Rights

In accordance with the Universal Declaration of Human Rights, it respects universal human rights in the countries where it operates and aims to prevent human rights violations. In addition, it respects the rights of indigenous peoples in the countries of operation by referring to the United Nations Declaration of the Rights of Indigenous Peoples .

2.2 Equal Opportunity, Respecting Differences and Diversity

Gender, language, religion, race, ethnicity, sexual orientation, nationality, age, pregnancy, marital status, union membership, political opinion and similar issues among employees in human resources processes such as remuneration, recruitment, personal and professional development, and in the business environment. It has an equal attitude without making any discrimination depending on the issue and does not tolerate discrimination in these matters. While executing its approach towards employees with the principle of right person for the right job, it manages processes transparently depending on the qualifications, experience and performance of the employees. It respects diversity, which is an important element of organizational structure.

2.3 Collective Bargaining Right and Freedom of Association

Respects employees' right to collective bargaining and freedom of association.

2.4 Freedom of Expression

It adopts the principle of preventing any situation that may hinder employees' right to freedom of expression in the business environment.



2.5 Healthy and Safe Working

It considers providing the conditions and work environment where they can work safely and happily to all its employees among its priorities and acts in line with the goal of "zero accident" in all its activities . Oversees full compliance with international principles and national laws and regulations regarding OHS; is committed to providing good practices beyond legal obligations.

2.6 Prevention of Abuse

It does not tolerate incidents such as ill-treatment, intimidation and harassment in the business environment.

2.7 Forced Labor and Human Trafficking

It strictly prohibits forced labor and human trafficking.

2.8 Child Labor

It prohibits child labor in line with the principle of not employing child labor as set forth in the Declaration of Fundamental Labor Principles and Rights of the International Labor Organization.

2.9 Criminal Acts

It does not take any initiatives that may result in a crime or violation of rights in the countries where it operates. In this regard, it expects employees to show sensitivity in the same direction.

2.10 Stakeholder Feedback

It gives importance to the feedback and opinions of the stakeholders about the policy. Policy-related feedbacks and possible policy violations and non-compliances are reported via [etik@nuhcimento .com.tr](mailto:etik@nuhcimento.com.tr) .

3. Compliance, Monitoring, Audit and Reporting

3.1 Responsibility for human rights policy rests with the CEO and Board Members at the highest level.

3.2 The Board of Directors of the Company is responsible for the oversight of the determination and operation of notification, review and sanction mechanisms in case of non-compliance with the human rights policy, rules and regulations.

3.3 Nuh Cement Group identifies the possible human rights problems that may arise in its activities and the groups that will be most affected by these problems, and tries to reduce and prevent these effects in case of a negative impact on human rights. If human rights are at risk, necessary measures are taken by contacting the authorities.



3.4 In order to report violations of compliance with the Policy , a system has been established in which the identity of the whistleblower will be kept confidential.

3.5 The policy is reviewed by the Ethics Committee every two years and the implementation of the policy is followed up. In case of feedback from stakeholders, the Board quickly takes action and reviews the Policy .

4. Resolution of Policy Non-Compliances

4.1 Within the scope of the policy, formal and informal complaint mechanisms are developed in order to compensate for the rights violations committed by Nuh Çimento Group.

4.2 If the Ethics Committee deems necessary, it may seek expert opinion and benefit from experts by taking measures that will not violate the principles of confidentiality during the investigation. All information and documents requested by the Ethics Committee during the investigation are given to the committee. All employees are obliged to assist the Ethics Committee in this regard.

No retaliation is made against any employee who raises concerns within the scope of the policy, and notifications are handled through processes that protect confidentiality. Failure to comply with the Policy may result in disciplinary or criminal action.