

2025



ODAS's HUMAN RIGHTS POLICY

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01 Purpose and Scope

ODAŞ's Human Rights Policy ("Policy") is a policy document drafted by ODAŞ Elektrik Üretim Sanayi Ticaret A.Ş. ("ODAŞ") with the purpose of creating a fair, safe, and non-discriminatory working environment based on respect for human dignity across all of its operations. This Policy applies not only to ODAŞ employees; but also to affiliates, subcontractors, consultants, suppliers, and all other business partners with whom ODAŞ has a business relationship. ODAŞ prioritizes human rights as a core value across all industries it operates in, in line with its dynamic structure and agile management approach; and systematically protects these values not only within its internal processes but throughout its entire sphere of influence.

The principal objective of the policy is to ensure full compliance with national legislation while adopting international human rights standards as an integral part of ODAŞ's business practices and thereby improving corporate sustainability. ODAŞ is committed to preventing potential human rights violations, implementing effective response and remediation measures against identified violations, and acting in accordance with the principles of transparency and accountability, by adopting a culture of continuous improvement.

This policy is an integral part of ODAŞ's Code of Ethics. This document, drafted with the purpose of establishing a corporate structure that is conscious of human rights, mindful of environmental impacts, and values people, is an important part of ODAŞ's corporate culture built on ethical foundations.

02 Legal Basis and International Standards Referenced

This Policy is grounded not only in national legislation but also in universal human rights principles recognized at the international level. In the formulation of its human rights approach, ODAŞ adheres to full compliance with global standards and considers these principles an integral part of its business practices. It is committed not only to legal requirements in all areas of its operations, but also to a system of corporate values that is ethical, sustainable, and respectful of human rights.

In this regard, ODAŞ undertakes to operate in full compliance with the international standards and framework documents listed below:

- United Nations Universal Declaration of Human Rights (1948)
- United Nations Global Compact
- United Nations Convention on the Rights of the Child (1989)
- OECD Guidelines for Multinational Enterprises
- The International Labour Organization (ILO) Fundamental Conventions, particularly:
 - ILO Conventions Nos. 29 and 105 (Prohibition of Forced Labour)

- ILO Convention No. 138 (Minimum Age)
- ILO Convention No. 182 (Prohibition of the Worst Forms of Child Labour)
- ILO Conventions Nos. 100 and 111 (Elimination of Discrimination and Equal Remuneration)

ODAŞ recognizes these instruments not only as references but also as fundamental principles guiding human rights practices. Acting in accordance with the essence of these instruments at all stages of corporate operations is a natural extension of ODAŞ's ethical stance and agile business model.

03 Guiding Principles and Commitments

ODAŞ regards respect for human dignity as central to its operations and acts with the awareness that every individual possesses universal, indivisible, and inalienable rights. This approach is a corporate stance that is reflected not only in internal policies and procedures, but also in all of the company's decision-making and implementation processes.

Equality and inclusion are essential in all human rights practices. There is a zero-tolerance policy for forced labor, child labor, discrimination, and similar human rights violations; all employees and stakeholders are ensured to operate in a physically and psychologically safe, respectful, and healthy working environment. Matters such as fair wage policies, regulations on working hours, and right to rest are addressed not only as legal requirements but also as a part of ethical responsibility.

This approach is not limited to ODAŞ's own operational areas. Affiliates, subcontractors, suppliers, and all other business partners are also required to follow these principles. ODAŞ strictly implements risk analysis, preventive systems, regular audits, and continuous improvement processes to ensure respect for human rights within this extensive chain of responsibility. Backed by ODAŞ's dynamic governance approach, this system is one of the cornerstones of both social responsibility and sustainable corporate success.

04 Zero-Tolerance Policy Against Child Labour

ODAŞ adopts an absolute zero-tolerance approach to child labor not only within its own field of operations but throughout its entire supply chain. This principle is not only considered as a legal obligation; but also a direct manifestation of ODAŞ's commitment to establishing an organization that is sensitive to human rights, committed to ethical values, and acts with a sense of social responsibility. Protecting children and supporting their development is one of the cornerstones of our vision for a sustainable future.

4.1. Definition and Scope

Child labor is defined as the employment of individuals below the minimum legal age or the establishment of an employment relationship with this age group. The stance against child labor as defined in this Policy applies to and is binding on ODAŞ's own employees as well as its subcontractors,

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consultants, suppliers, and all other business partners.

ODAŞ acts in full compliance not only with the relevant legislation of the Republic of Türkiye but also with international standards in the efforts to eliminate child labor. In cases where local regulations are more stringent, the higher standard applies.

4.2. Implementation of Policies and Agreements

On the part of ODAŞ and all its suppliers, the employment of individuals below the minimum legal age is strictly prohibited, except for those who are considered as interns under local and international legislation. To enforce this prohibition effectively, clear, binding, and traceable provisions prohibiting child labor shall be included in contracts with suppliers and subcontractors. It is obligatory for ODAŞ to obtain written commitments regarding full compliance with the aforementioned prohibition and to keep them securely stored in its corporate record systems.

4.3. Risk Assessment and Mapping

ODAŞ regularly conducts risk assessments in the regions where it operates and in the regions of its suppliers in order to effectively manage the risk of child labor. More rigorous oversight and control processes are developed for business partners operating in high-risk sectors such as agriculture, construction, mining, and textiles.

In this process, industry trends, country-specific official reports, field observations, data provided by non-governmental organizations, and the past performance of suppliers are assessed employing a multi-dimensional approach to create a comprehensive risk mapping.

4.4. Audit and Monitoring Mechanisms

ODAŞ implements a multi-layered oversight and monitoring system to eliminate the risk of child labor entirely. Planned and unannounced field inspections are conducted for suppliers; the documents submitted by them are systematically checked for accuracy.

All findings obtained as a result of inspections are recorded; if any deficiencies or risks are identified, corrective action plans are drafted in collaboration with the relevant supplier, and the implementation of these plans is closely monitored.

If a supplier is found to be using child labor, ODAŞ's priority is to protect the child, ensure their safety, and provide rehabilitation. In this context, the violation is immediately terminated, the child is removed from work, and it is ensured that the child is directed to school and receives educational support and integration into social protection systems. If the improvements fail within the corrective action plan period given to the supplier, the business relationship will be gradually terminated. It is mandatory to report these processes to the ODAŞ Ethics Committee and the management of the relevant department.

4.5. Sectoral and Corporate Partnerships

ODAŞ actively seeks opportunities to join and contribute to initiatives within the sector aimed at eliminating child labor. It also takes part in collective projects carried out in collaboration with non-governmental organizations, public institutions, and industry representatives, supporting these projects and contributing to society.

4.6. Reporting and Transparency

The practices aimed to combat child labor and all activities carried out in this regard are reported annually. The reports drafted are shared with the internal audit department, the ODAŞ Ethics Committee, and the Board of Directors. When required, these are also incorporated into sustainability reports and shared transparently with the public. The principle of transparency has been adopted with the aim of both strengthening social trust and aligning ODAŞ's ethical values with corporate responsibility.

05 Preventative Measures Against Forced Labour

ODAŞ acts with a strict zero-tolerance policy against all forms of forced labor in all its operations and business relationships. This principle covers not only the company's own organization, but also its affiliates, subcontractors, consultants, suppliers, and all other business partners. Establishing a work environment where employees' rights are secured and they are not subjected to any pressure, threats, or coercive actions is a fundamental component of ODAŞ's corporate vision focused on human rights. ODAŞ acts in full compliance with international standards regarding the prohibition of forced labor.

5.1. Principles of the Policy

Within ODAŞ and throughout its entire supply chain, no form of coercive employment such as bonded labor, prison labor, exploitation of migrant workers, or similar practices is tolerated under any circumstances. It is essential that employees are employed solely on a voluntary basis. It is expressly prohibited to use threats, punishment, financial pressure, or indirect pressure methods involving family members in any form.

5.2. Protective Measures for Migrant Workers

In cases where migrant workers are employed through intermediary agencies, ODAŞ takes specific measures to ensure the protection of these individuals' rights. All fees and agency charges that may be incurred during the recruitment process shall be covered by the employer without any financial burden on the employee. With regard to migrant workers, it is mandatory that expenses such as transportation, relocation, and accommodation, which fall under the responsibility of ODAŞ, shall be provided in a manner that does not place any pressure on the employee.

Under no circumstances does ODAŞ permit the practices restricting personal rights, such as the confiscation of identity documents (passports, work permits, etc.), or practices that may indirectly impose pressure, such as deposits, sureties, or insurance deductions. Contracts entered into with agencies acting as intermediaries in the employment of migrant workers shall include provisions that explicitly incorporate these protective principles, and written commitments shall be obtained in accordance with these provisions.

5.3. Contracts and Commitments with Suppliers

Obligations to prevent forced labor shall be directly reflected in contracts established with suppliers. Express and binding clauses prohibiting forced labor shall be included in all contracts concluded within

this scope. Suppliers shall also be required to provide a written commitment that they will act in accordance with this prohibition.

During its supplier assessment processes, ODAŞ prioritizes the monitoring of business partners operating in high-risk industries (primarily construction, agriculture, and textiles) and in countries where there is a risk of forced labor.

5.4. Audit and Monitoring Mechanisms

The multi-layered supervision system developed by ODAŞ to prevent forced labor includes regular and unannounced field visits, processes for verifying documentation, and independent third-party audits, where required. This supervision system is designed not only for the purpose of monitoring, but also to support the development of suppliers and preemptively eliminate ethical risks.

Particularly in high-risk industries, collaboration is established with local consulting firms and non-governmental organizations. Thus, both the effectiveness and sustainability of the practices are improved by integrating local sensitivities into the processes.

If a forced labor violation is observed, ODAŞ shall request that the violation is terminated and that the supplier makes improvements within the framework of a corrective action plan, prioritizing the protection of the affected worker's rights, psychological support, and the prevention of further rights violations. If no improvement can be achieved, legal options, including termination of the business relationship, shall be considered. All these processes are monitored by the ODAŞ Ethics Committee and reported to the relevant management departments.

5.5. Reporting and Transparency

ODAŞ regularly and dynamically analyzes the results of its operations and systematic practices against forced labor. The outcomes of audits, corrective actions, and training programs are reviewed annually under the coordination of the ODAŞ Ethics Committee. Where deemed appropriate, these reviews are integrated into sustainability reports or annual ethics reporting and shared transparently with stakeholders.

06 Prevention of Discrimination and Commitment to the Principle of Equality

ODAŞ is committed to provide all employees and business partners with a fair, equitable, respectful, and inclusive working environment in accordance with its corporate values based on respect for human dignity and diversity. ODAŞ does not tolerate discrimination based on race, color, gender, age, ethnicity, religion, political opinion, disability, marital status, sexual orientation, social status, or any other similar grounds under any circumstances.

6.1. Principles of the Policy

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All human resources processes at ODAŞ, including hiring, remuneration, promotion, discipline, reassignment, and termination of employment, are carried out through systematic and transparent processes based on merit, performance, and competence. In the structuring of these processes, not only operational efficiency but also the principles of ethical responsibility are prioritized.

Equal access to opportunities for all employees is not only a legal obligation for ODAŞ; it is also one of the core values of its corporate culture. Indirect forms of discrimination, such as harassment, workplace bullying, exclusionary behavior, and derogatory language, are strictly prohibited. Such actions not only jeopardize individual rights but also compromise the integrity of the company and its sustainable business environment.

6.2. Protection of Vulnerable Groups

ODAŞ is committed to preventing workplace discrimination against vulnerable groups, recognizing the value of diversity and the strategic importance of an inclusive work environment. For this purpose, it develops dynamic support mechanisms based on needs. As an example of the measures taken in this respect; practices for

- taking measures for physical accessibility,
- drafting of training content against discrimination,
- adopting equal opportunity policies for all employees, and
- providing support systems for employees with language barriers

are implemented. These mechanisms guarantee the establishment of an inclusive structure that supports not only the principle of equality, but also dynamism and individual development in the workplace.

6.3. Whistleblowing and Response Mechanisms

All kinds of concern regarding discrimination are assessed based on the principle of confidentiality and without compromising the principle of impartiality. In this regard, the ODAŞ Ethics Committee conducts a systematic review process.

To ensure that employees can comfortably raise their concerns, the ODAŞ Ethics Hotline is kept available through multiple and accessible reporting channels. If a breach of ethics is identified, disciplinary proceedings shall be initiated without delay; in these proceedings, the fundamental principles of ensuring justice and protecting the victim, shall be applied.

6.4. Training and Awareness

ODAŞ adopts a dynamic approach in the fight against discrimination, aiming not only for a procedural but also a cultural transformation. In this respect, training programs on equality, diversity and anti-discrimination are held at least once a year for all employees. While new recruits are briefed on relevant policies during their induction process, managers are offered special development modules on leadership and management practices based on equality.

The purpose of these training programs is to reinforce corporate behavioral norms and establish an internalized ethical culture throughout the entire organizational structure by raising systematic awareness.

07 Corrective Actions and Remediation Mechanisms in Case of Violation

In the event of any violation of human rights, ODAŞ does not rely solely on immediate responses; it also implements a comprehensive and multi-stage corrective action and remediation mechanism aimed at compensating the loss suffered, preventing the recurrence of similar violations, and sustainably strengthening the company's ethics system. This mechanism represents a dynamic structure that intends to implement dynamic intervention capabilities, systematic improvement processes, and a transparent accountability simultaneously.

7.1. Principles of Intervention

ODAŞ responds immediately when a report of violation is received or when an inspection reveals a practice that violates human rights. When necessary, emergency measures such as the temporary suspension or postponement of relevant operations are implemented promptly. During the response process, protecting the victims, securing their rights, and remedying the damage caused are the top priorities. All actions are conducted in accordance with the principles of confidentiality, impartiality, agility, and ethical integrity.

7.2. Steps for Corrective Action

The general steps for the corrective process to be implemented in cases of violation are structured as follows:

- Evidence of violation is documented through records, visual materials, witness statements, or independent audit reports.
- Temporary measures are taken promptly to prevent the continuation of the violation. Depending on the nature of the violation, these measures may range from suspending the employee involved, to suspending the process with the supplier, or even terminating the operation.
- A structural plan based on root-cause analysis, and incorporating a timeline and monitoring indicators, is drawn up by the responsible department or third-party business partner. This plan covers the root causes of the issue, the structural measures to be taken, the training and awareness steps, and the dates of follow-up audits.
- After the implementation of the plan, the results are monitored by the ODAŞ Ethics Committee, and the need for additional measures is assessed.

8.3. Remediation and Victim Support Processes

Appropriate support mechanisms are established for individuals who have suffered harm as a result of the violation. The principles of confidentiality, consent of the victim, and respect for human dignity are observed at every stage of these processes. When required, more inclusive solutions are provided by collaborating with public institutions or non-governmental organizations. Support processes include the payment of wages owed and the restoration of contractual rights, support from psychological

counselors, rehabilitation and educational guidance (especially in cases of child labor), referral to new job opportunities, and ensuring safe working environments.

These practices also serve the company's goal of building a dynamic and sustainable ethics system.

8.4. Assessment of the Business Relationship

In the event that the corrective action plans drafted are not implemented, the violation is repeated, or a constructive cooperation cannot be established with the relevant parties, ODAŞ reserves the right to terminate its business relationship with the relevant supplier or third party. In such cases, legal proceedings are initiated in accordance with the terms of the contract to compensate for any damages incurred.

09 Activities for Communication, Education, and Raising Awareness

ODAŞ conducts systematic, dynamic, and multi-layered communication, training, and awareness-raising efforts to ensure that human rights policies are not merely limited to written documents, but are internalized by all employees and business partners and become an integral part of the corporate culture. These efforts are organized in line with the company's sustainability approach.

9.1. Training Programs

All employees receive training at least once a year on the concepts outlined in the Policy in order to improve their knowledge of human rights and ensure that this knowledge is reflected in their practices. These training programs cover key topics such as the prohibition of forced labor and child labor, fighting against discrimination, the use of ethics reporting mechanisms, and the principles of ethical conduct. New recruits are introduced to the ODAŞ Human Rights Policy as part of their induction program and are informed about the procedures to follow in case of potential violations. For mid-level and senior managers, specialized training programs are organized with more advanced content, focusing on managerial responsibilities regarding human rights violations and the risks encountered in practice.

The purpose of these training programs is not only to ensure compliance with regulations, but also to develop an awareness of ethics among employees and to establish an agile response mechanism within the company.

9.2. Efforts for Suppliers and Business Partners

ODAŞ adopts proactive communication and awareness strategies to ensure that its suppliers and other third-party business partners also adopt an approach that respects human rights. Furthermore, suppliers are expected to plan similar information and training programs for their own employees. For High-risk supplier groups, specialized one-to-one training courses conducted on-site and on-site consulting services can be introduced. These practices contribute to raising awareness about human rights throughout the supply chain, while also further supporting ODAŞ's principles of sustainability and environmental responsibility.

9.3. Communication Tools and Sharing of Content

The full text of ODAŞ's Human Rights Policy shall be made available to all employees through the company's digital internal communication platforms. Also, it shall be made available to the public on the corporate website in accordance with the principle of transparency. To keep awareness of human rights on the agenda, digital newsletters and other informational materials shall be regularly shared throughout the year on specific days and weeks (such as Human Rights Day and International Women's Day). For ODAŞ, human rights are a dynamic agenda that the company pursues throughout the year.

9.4. Implementation and Feedback

The effectiveness of training and communication efforts is regularly reviewed. In this regard, short assessment surveys are conducted at the end of each training session, and content updates are made based on the findings of these surveys. During the development of training and awareness programs, not only internal requests are considered; data from international developments, internal audit results, trends in the industry, and reporting mechanisms are also taken into account. Thus, ODAŞ maintains an agile structure that can consistently maintain its efforts on human rights training and communication in a timely, responsive manner and integrated with the field.

10 Governance, Responsibilities, and Monitoring

A robust governance structure, clear areas of responsibility, and well-institutionalized monitoring systems have been established to ensure the effective implementation of ODAŞ's Human Rights Policy. This structure not only ensures the implementation of policy, but also guarantees dynamism, sustainability, and continuous improvement of these processes. The responsibility for implementation is not limited to specific departments but is shared throughout the entire organization.

9.5. Corporate Responsibilities

ODAŞ's relevant business departments and ODAŞ Ethics Committee integrate this Policy into all human resources processes such as recruitment, promotion, discipline, and termination of employment, monitor compliance with human rights obligations by considering human rights risks in supplier assessments, conduct audits, regularly assess the practices of all departments for compliance with legislation, internal regulations, and international standards, report the results, and recommend action plans where necessary.

9.6. Performance Indicators and Monitoring

ODAŞ monitors its human rights performance using measurable, comparable indicators that are open to improvement. The scope of audits, the number of violations found, the time taken to resolve such violations, and the implementation rate of corrective action plans constitute the essential components of the monitoring system. Moreover, rates of participation in annual training programs and employee assessment surveys are also used to measure the system's effectiveness. These indicators are collected at least once a year, then analyzed, and the results are reported to the Board of Directors. Thus, both transparency and a corporate learning culture are supported.

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9.7. Integration with ODAŞ Ethics Hotline and Reporting Systems

All reports on violations of human rights can be submitted through ODAŞ's current ODAŞ Ethics Hotline. These reporting mechanisms are designed to be easily accessible, secure, and to allow anonymous use. Reports received are assessed within the framework of confidentiality; and impartial investigations are conducted when deemed necessary. All these systems operate in an integrated manner with reporting and corrective action mechanisms related to human rights.

9.8. Continuous Review

The Human Rights Policy is a dynamic document. It is systematically reviewed at least once a year in coordination with the ODAŞ Ethics Committee, in line with the implementation results, changes in legislation, and developments in international standards. Through this process, the need for an update is assessed by taking into account the findings of internal audits, stakeholder feedback, and global trends.

10 Enforcement

ODAŞ's Human Rights Policy has entered into force as of 25.07.2025, pursuant to the Board of Directors' Decision dated 25.07.2025 and numbered 2025/10. The effective date and version information of the Policy shall be clearly stated in the document. The Policy is published and made available on internal company systems and the corporate website.

ODAŞ Ethics Committee is responsible for implementing, monitoring, and assessing the effectiveness of the Policy. Within this scope, ODAŞ Ethics Committee identifies risks in the implementation of policies, reviews the ethics reports received, monitors the system's effectiveness regarding violations, and recommends corrective actions when necessary. Recommendations for revisions are prepared by the ODAŞ Ethics Committee and implemented by the Board of Directors. Updated versions of the Policy are clearly communicated to all employees and relevant stakeholders.

Contact Us



Headquarters

Barbaros Mh. Başak Cengiz Sk.
Varyap Meridian Sitesi No:1/D Villa 4
Batı Ataşehir / İstanbul

Get in Touch

info@odasenerji.com

Website

www.odas.com.tr

Tel

+ 90 216 474 1 474