2025

# ODAŞ'S PEOPLE AND CULTURE POLICY

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# 01 Purpose and Scope

**1.1.** The purpose of the ODAŞ's People and Culture Policy ("Policy") is to ensure that the "People and Culture" processes of ODAŞ Elektrik Üretim Sanayi Ticaret A.Ş. ("ODAŞ") are managed in a transparent, fair, equitable, and sustainable manner in line with the strategies, values of the Company, and relevant legal regulations; and to contribute to the achievement of the Company's environmental, social, and governance sustainability goals through the fair, transparent, and responsible management of people and culture processes.

Our goal is to create a fair, safe, and inclusive working environment focused on development for all ODAŞ employees, maximize our employees' contribution to the goals of the Company, and fully realize the potential of our most valuable asset: our human resources.

**1.2.** This policy applies to all employees employed under a contract of employment within ODAŞ. The processes outlined in the procedure may be flexibly adapted to the specific requirements and operational requirements of employees working in different locations and working conditions within the Company (office, field, mining areas, etc.) and are implemented in accordance with the relevant processes.

**1.3.** ODAŞ approaches People and Culture processes with a comprehensive approach, and with a management philosophy that is transparent, fair, innovative, open to continuous improvement, and focused on employees. This approach requires acting in full compliance with international standards, including the United Nations Universal Declaration of Human Rights, the UN Global Compact, the ILO Core Conventions, and the OECD Guidelines for Multinational Enterprises, in addition to the national legislation. For ODAŞ, the principle of "employee-orientation" involves ensuring employees' well-being, promoting their work-life balance, and creating an inclusive work environment where all employees feel valued and included.

The core values we have adopted at ODAŞ and our corporate capabilities that promote these values are an integral part of all our People and Culture processes and the way we conduct business. These values reflect our faith in a sustainable future and shape each employee's contribution to ODAŞ's overall goals.

**1.4.** Our Values, which are the most fundamental indicator of ODAŞ culture and guide all our employees to act in cooperation, define ODAŞ's philosophy of existence and way of doing business. As detailed in ODAŞ's People and Culture Procedures, these values reflect ODAŞ's overarching goals, ideals, and high standards.

Our values serve as our compass in our decision-making processes, while performing our duties, during project management, while developing our internal or external collaborations, and in short, at every moment we operate under the framework of ODAŞ. These common values represent our characteristics that hold our organization together, guide our employees' behavior, and contribute to ODAŞ's sustainable success.

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ODAŞ strives to unite our employees around a shared vision and ethical understanding by establishing the key characteristics that guide all of our organization's actions through the 5 core values it has defined.

| Values | Description |
|---|---|
| Valuing Togetherness | We believe in the power of unity and teamwork across all our endeavors, and celebrate success together. |
| Dynamic | We take swift and accurate action thanks to our dynamic structure that adapts to changing conditions. |
| Embracing Development | We champion innovative paths of growth through lifelong learning, and consider our experiences as valuable guides on this journey. |
| Upholding Reliability | We place a strong emphasis on reliability in all our interactions with stakeholders, investors, and team members, and foster trust through transparent communication. |
| Exploring | We are passionate about diversifying our operations by exploring different areas with an innovative perspective in every field we operate in. |

Our Core Competencies, which are fully aligned with our values, are strategically integrated into our People and Culture Processes. These competencies have been defined with the aim of accurately and consistently communicating the ODAŞ culture, effectively utilizing this culture throughout all processes, and establishing a common language of behavior across the company.

Our corporate competencies are used as a fundamental tool in all behavioral assessments, including the recruitment of talent who are compatible with our culture, the careful identification and planning of our employees' areas for development. In this way, the sustainability of ODAŞ's unique and strong culture is assured.

The 10 corporate competencies, carefully defined within the framework of our values, are detailed with behavioral indicators that clearly describe what each competency means and how it can be observed.

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| Values | Corporate Core Competencies | Behavioral Indicators |
|---|---|---|
| **Valuing Togetherness** | Developing Collaboration | • Open to collaboration; facilitates and encourages teamwork.<br>• Works together to achieve common goals and results.<br>• Recognizes the requirements of colleagues and provides the necessary information and assistance.<br>• Pays attention to and values the different perspectives of others. |
| **Dynamic** | Results-Oriented | • Plans what is necessary to achieve the goals and communicates with solution partners.<br>• Uses their resources, knowledge, and experience to reach a conclusion.<br>• Analyzes the circumstances, identifies the root causes of problems, and seeks alternative solutions.<br>• Investigates and utilizes technology and new trends to find the right solution.<br>• Questions the accuracy or feasibility of the conclusion reached. |
| | Resilience | • Successful in understanding and adapting to the requirements of the new circumstances.<br>• Adapts quickly to changing schedules, job descriptions, and locations; adjusts easily.<br>• Can work without losing their control in difficult and stressful circumstances.<br>• Maintains their belief in their ideas, principles, and proposals. |
| | Agility | • Adds value to the work by recognizing the challenges as opportunities.<br>• Makes quick but wise decisions in response to incidents, setting new paths when necessary.<br>• Establishes the necessary cooperation, conducts the necessary research, and involves stakeholders in finding solutions to the challenges encountered.<br>• Rapidly develops alternative solutions when they fail to meet expectations. |
| **Embracing Development** | Agility in Learning | • Eager to acquire a new skill.<br>• Intellectually curious; eager to learn new things.<br>• Highly aware of their own knowledge and skills, needing development when necessary.<br>• Investigates, questions, verifies, and evaluates information and its source. |
| | Conceptual Thinking | • Thinks system-oriented.<br>• Instead of finding immediate solutions to problems encountered, they find the source of the problem and develop permanent solutions.<br>• Their approach to matters does not remain confined to their own perspective; they make comparisons both within and outside the organization.<br>• They are aware of the impact of their work and its results. |
| **Upholding Reliability** | Effective Communication | • Shares information accurately and clearly when necessary.<br>• Listens actively to understand the other person correctly.<br>• Supports the establishment of transparent, respectful relationships based on trust among all stakeholders.<br>• Gives objective feedback and is open to receiving feedback. |
| | Exhibiting Credibility | • Sets parameters clearly when planning, making decisions and taking action, and setting deadlines.<br>• Acts by owning up to their work.<br>• Takes responsibility for their decisions, actions, and failures.<br>• Establishes clear definitions and processes to monitor the work and measure the results. |
| **Exploring** | Innovation | • Finds different or new ways of doing things and brings out multiple perspectives.<br>• Connects ideas, events, and conditions that are not directly related to the problem in order to find permanent solutions to problems.<br>• Considers potential problems and proposed solutions without being bound by routine or the current circumstances, anticipating how they will impact the problem.<br>• Finds new ideas, methodologies, projects, experiences, ways to transform the ideal into reality. |
| | Internal Proactivity | • Can develop a business plan without requiring too much guidance.<br>• Takes initiative regarding their own work and schedule; understands their responsibilities and does not wait for instructions.<br>• Presents opportunities and solutions without waiting to be asked.<br>• Is aware of pending actions, measures to be taken, ideas and solutions to be developed within the scope of their authority, and implements them without delay. |

## 1.5. Organizational Structure
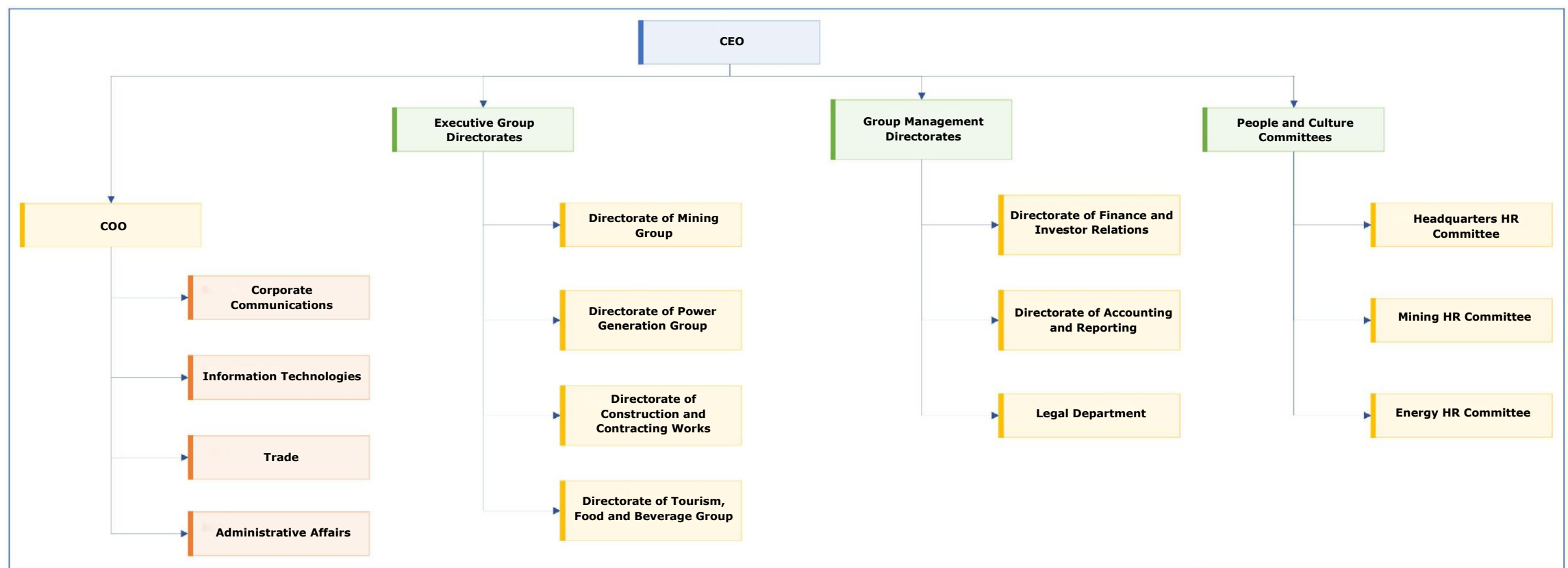


ODAŞ's organizational structure is shaped on the basis of "Business Families," defined by taking into account the level of initiative and delegation in management, the level of the use of technical knowledge and skills, administrative responsibilities, and the nature of operational duties, as detailed in the People and Culture Procedures. This structure is intended to provide agility and efficiency in achieving ODAŞ's strategic goals.

The main business families and their roles in our organization are as follows:

- **Operational Assistance Business Family:** This includes personnel working in the areas where ODAŞ's operational activities are carried out and who are directly responsible for the successful completion of these operations. This business family plays a key role in integrating principles of field safety and environmental compliance into operational processes.

- **Technical Assistance Business Family:** This includes specialized personnel who work in our businesses affiliated with our business lines, add value to the organization with their technical knowledge and skills, and undertake and direct technical tasks. This business family makes significant contributions in the areas of technological sustainability and operational excellence.

- **Management Assistance Business Family:** This includes personnel who possess profound expertise in their respective fields and work closely with management teams, laying the groundwork for managerial decisions within the organization through their knowledge, skills, and experience. This business family plays a supporting role in promoting corporate governance principles and ethical decision-making processes.

- **Management Business Family:** This family consists of members of ODAŞ's management team who take on broad responsibilities in both administrative and technical matters. They are professionals who guide and lead the teams they are affiliated with within the scope of their own management initiatives. The business and process knowledge of these staff members, as well as their strong communication and team management skills, are as important as their depth of technical expertise; because they are in a position to achieve business results by influencing, guiding, and building cooperation with their teams or internal/external stakeholders.

- **Strategic Management Business Family:** This includes the staff who have a say in the management of ODAŞ, make macro-level decisions that affect the entire group, and guide the organization's overall strategy. This business family shapes processes within their own sphere of management in line with the company strategy, managing and directing employees within their sphere of influence and all external stakeholders. They play a visionary leadership role in achieving ODAŞ's long-term sustainability goals.

All processes that are subject to the People and Culture Policy are addressed in line with the organizational structure mentioned above and can be differentiated and implemented by considering the specific requirements of the relevant business families and roles. The People and Culture Committee plays an active role in the social responsibility processes of the Corporate Sustainability Committee, continuously strengthening the alignment of our organizational structure with our sustainability goals.

### 1.6.   The Approach to Sustainability and Its Place in People and Culture Processes

ODAŞ believes in commitment to sustainability not only in terms of financial success, but also in environmental, social, and corporate governance (ESG) areas. With this in mind, ODAŞ adheres to the principles of sustainable development in all its operations and implements these principles through its People and Culture Procedures. These Procedures are intended to strengthen the Company's position in global sustainability standards and indices by managing people and culture processes in a fair, transparent, and responsible manner, and to directly contribute to its performance in the "Social" (employee rights, occupational health and safety, diversity, training) and "Governance" (ethics, transparency, accountability) aspects.

The well-being and development of employees and an inclusive work culture are among the core values that guide ODAŞ's sustainable future.

# 02 Fields of People and Culture Policy

## 2.1. Talent Acquisition and Recruitment Policy

As one of the industry's leading organizations in terms of diversity, ODAŞ recognizes different languages, religions, races, genders, ages, disabilities, marital statuses, or other personal characteristics as a source of enrichment. ODAŞ hires candidates who are compatible with its corporate culture, possess the necessary knowledge, skills, and competencies, and have high potential through fair, transparent, and evidence-based processes. We strive to successfully implement our sustainability goals within our workforce planning—such as raising the female employment rate to universal standards and ensuring the quota for people with disabilities is met—with a sensitive approach to these issues.

Candidates from local communities and diverse demographic groups are actively supported in the management of candidate sources, and a diverse talent pool is created through partnerships with

schools and mentoring programs. Our tools for assessment include scenario-based questions and case studies that measure candidates' alignment with ODAŞ's ethical values, strong OHS culture, and environmental and sustainability awareness, rather than just their technical skills.

Thanks to this approach, we are strengthening both business performance and corporate innovation by adding talents from diverse backgrounds and experiences to the ODAŞ family, which already features a high level of diversity, each year.

## 2.2. Career Management and Development Policy

ODAŞ aims to provide horizontal and vertical career development opportunities within the Company by utilizing the competencies, experience, and potential of its employees to the fullest extent. Promotion, job rotation, and transfer processes are managed based on objective criteria, merit, and transparency. Career paths are also designed to develop employees' competencies in sustainability and leadership. ODAŞ supports the continuous development of its employees and focuses on securing its future leaders from its internal talent pool.

The following promotion types are mainly implemented in all operations at ODAŞ.

- Vertical Promotion: Promotion of an employee to a higher position with an increase in salary.
- Horizontal Promotion: Increasing an employee's salary range without changing their job title.
- Career Mobility: Promotion of employees to a different department with an increase in salary.

## 2.3. Performance Management and Recognition Policy

The performance of employees is evaluated through an objective, efficient, and fully transparent system that is fully aligned with ODAŞ's strategic goals and conducted using modern performance management tools and digital platforms. Thanks to cloud-based performance portals and real-time dashboards, monitoring of individual targets, measurement of KPI focused on occupational health and safety, ethics, and environmental responsibility, and feedback processes are carried out in a fast and traceable manner.

Regular feedback practices and 360-degree evaluation modules serve as a constructive tool for reinforcing employees' strengths and identifying areas for development. All performance data, development plans, and reward criteria are made available to employees through digital systems backed by fair, equitable algorithms. Outstanding performance and actions in line with ODAŞ values are recognized and rewarded through announcements on the platform, point systems, and career development opportunities. Thus, our processes become more efficient, and a reliable and transparent performance management culture is established for all stakeholders.

## 2.4. Remuneration and Benefits Policy

ODAŞ offers its employees a remuneration and benefits package that is fair, competitive, and performance-based, in line with the market conditions. Our remuneration policy is based on the principle of "equal pay for equal work" and is managed with transparency, competitiveness, sustainability, and full compliance with the law as its guiding principles. The policy includes regulations for preventing wage differences based on gender, age, or other personal characteristics, and is reviewed regularly in this regard. We contribute to the quality of life of our employees by offering benefits and social amenities that support employee well-being.

## 2.5. Learning and Development Policy

ODAŞ aims to continuously support the professional and personal development of its employees, strengthen their competencies, and help them adapt to changing dynamics in the industry. Learning and development activities are planned and implemented with a focus on occupational health and safety awareness, commitment to ethical values, environmental awareness, and technical expertise.

- **Orientation Program:** All new recruits are required to participate in a comprehensive program covering occupational health and safety culture, ethical principles, and ODAŞ's approach to sustainability.

The 5-day orientation program organized for all new employees consists of the following modules:

- o The Culture and Values of ODAŞ
- o Introduction to Occupational Health and Safety
- o Sustainability and Environmental Awareness
- o Digital Tools and Platforms
- o Position-Specific Introduction

- **General Training Target:** With a minimum training period of 160 hours per year, all training is delivered using role-based modern methodologies (such as classroom training, workshops, working groups, e-learning, live online presentations, and self-paced learning) with sustainability-focused modules covering energy efficiency, waste management, human rights, and anti-corruption.

A variety of skills and technical training courses are planned with a minimum training period of 160 hours per year:

- o Skills workshops (e.g., problem solving, teamwork, leadership workshops)
- o Technical seminars (e.g., innovations in energy efficiency, updates on maintenance techniques)
- o Modules on energy efficiency, waste management, human rights, and anti-corruption
- o Role-based technical trainings

- **Trainings for Managers/Supervisors (Chiefs):**

- o Leadership and Team Management: It is aimed to conduct at least 24 hours of workshops and case studies on change management, feedback culture, and resolution of conflicts.

- o Risk and Occupational Health and Safety Management: Advanced scenario drills on working at heights, maintenance of live lines, and emergency scenarios are conducted annually as training activities in accordance with legal requirements.

- o Ethics and Compliance Audit: Business ethics, compliance of the supply chain, and internal auditing skills are developed through training conducted with physical participation in 16 hours of field auditing activities annually.

- o Development of Performance: Performance management is realized through online, face-to-face, and session-based training on setting of goals, monitoring of OKR/KPI, and feedback processes.

- ODAŞ supports the professional and personal development of its employees with an inclusive and non-discriminatory approach appropriate to their positions. Our training programs include content specifically designed for different target audiences, such as beginners, technical teams, managers, and support units.

- **Beginners (Orientation):**
- o OHS culture, ethical principles, diversity & inclusion awareness
- o Sustainability and environmental awareness modules
- o Overview of company processes and policies

- **Technical / Operational Teams:**
  - Technical seminars appropriate for the position (e.g., techniques of plant maintenance, automation updates)
  - Skills workshops (e.g., problem solving, field risk assessment)
  - In-team communication workshops that promote diversity and inclusion

- **Managers / Supervisors:**
  - Leadership & team management workshops
  - Anti-discrimination policy and awareness-raising seminars
  - Performance management, feedback, and fair assessment tools training

- **Support & Administrative Units:**
  - Digital platform competencies (e.g. Reporting tools, collaboration software)
  - Data privacy, ethical business practices, and equal opportunity practices

- **Common Elements of Training Content:**
1. **Diversity & Inclusion:** Attitude against discrimination, case studies to raise awareness, and inclusive leadership skills
2. **Ethics and Compliance:** Anti-corruption, transparency, and supplier compliance processes
3. **OHS:** Role-based simulations, emergency drills
4. **Sustainability:** Modules on energy efficiency, waste management and protection of the environment

- **Target and Measurement:** Minimum 160 hours of training per year; 100% completion among relevant target groups; effectiveness is monitored through post-training surveys and KPI performance measurements.

Learning and development programs at ODAŞ are planned via digital platforms within the scope of the annual training calendar drawn up at the beginning of each year and implemented by integrating these programs into all employees' schedules. While the gains of participants are measured through tests, exams, and case studies, our cloud-based system provides real-time reports on participation, completion, success rates, training durations, and content analysis. This allows for transparent and traceable management of both strategic competency goals and learning outcomes focused on ethics, occupational health and safety, and diversity.

## 2.6. Employee Experience and Culture Policy

ODAŞ focuses on keeping its employees' motivation, commitment, and satisfaction at the highest level. We create a positive, inclusive, and supportive work environment to further enhance the employee experience. We value the opinions of our employees and provide transparent communication channels. We encourage practices that support work-life balance. We aim to reinforce the sense of belonging through social events and recognition programs, and to encourage and support employee participation in external social responsibility projects based on the principle of volunteering. Questions measuring employee perceptions regarding work-life balance, inclusivity, commitment to ethical values, and the company's sustainability efforts are added to employee satisfaction surveys.

## 2.7. Occupational Health and Safety Policy

Due to the nature of the energy and mining sectors, ODAŞ considers employee health and safety to be its highest priority. We take proactive measures to achieve zero workplace accidents and

occupational illnesses by fully complying with all legal regulations and international standards. Our primary commitment is to minimize risks in the workplace, promote safe working habits, and ensure that all employees receive comprehensive occupational health and safety training. Improving the effectiveness of reporting mechanisms for near misses and potential risks and analyzing them for the purpose of continuous improvement is an integral part of our OHS culture. Our subcontractors are also expected to comply with our OHS standards.

### 2.8. Ethics, Discipline, and Concern Management Policy

ODAŞ aims to abide by the highest ethical standards and show zero-tolerance for corruption, discrimination, harassment, and any kind of ethical violation. A transparent, consistent, and objective disciplinary process is adopted to prevent conduct that violates company rules, laws, and ethical principles, and to impose fair disciplinary action when necessary. Employees can report ethical violations or their concerns through channels that are secure, confidential, and guaranteed to be free from retaliation. All concerns are investigated promptly, impartially, and fairly in accordance with the relevant procedures through the "ODAŞ Ethics Hotline" established under the "ODAŞ's Code of Ethics" and the "Policy on ODAŞ Ethics Hotline."

### 2.9. Termination of Employment Contract and Exit Management Policy

The processes for termination of employment contracts are managed in a transparent and fair manner, in full compliance with relevant laws and internal company procedures. ODAŞ respects the rights of its employees and fulfills all its legal obligations (severance pay, notice pay, etc.) completely and on time. We rely on mutual goodwill during termination processes and ensure that employees are supported during their departure. Continuous improvement is sought by gathering feedback through exit interviews.

# 03 Roles and Responsibilities

### 3.1. The Board of Directors

The board is responsible for the approval of ODAŞ's People and Culture Policy, determining the general direction of the policy, and ensuring its alignment with company strategies. They lead at the highest level in creating an inclusive and ethical culture throughout the company.

### 3.2. People and Culture Supreme Board

The board is responsible for establishing, implementing, and managing this policy, developing related procedures, ensuring its currency, and communicating it to all employees. They are responsible for ensuring that people and culture processes are fully aligned with the company's sustainability goals and for carrying out continuous improvement activities.

### 3.4. All Managers

They are responsible for ensuring full compliance with the principles specified in this policy and the relevant Regulations/procedures within their own areas of responsibility and within their teams. They promote employee development, create a fair and inclusive work environment, monitor compliance with occupational health and safety regulations, and encourage ethical behavior. They ensure that

policies and procedures are properly communicated to their teams.

### 3.5. All Employees

They are bound to comply with the principles outlined in this policy, the relevant Regulations, and procedures. It is the responsibility of every employee to comply with Occupational Health and Safety rules, uphold ethical values, protect company assets, contribute to sustainability goals, and report any inappropriate circumstances through the relevant channels.

# 04 Review of the Policy and Reporting

This Policy shall be reviewed by the People and Culture Committee at least once a year or more frequently as necessary, in line with ODAŞ's business strategies, changes in legal regulations, best practices in the industry, global sustainability index criteria, and employee feedback. The necessary revisions shall be implemented upon approval by the ODAŞ Ethics Committee.

ODAŞ periodically monitors the performance of the People and Culture processes carried out under this policy in line with the principles of transparency and accountability. The related metrics and indicators (e.g., number of employees, training hours, diversity ratios, accident rates, employee turnover rate, satisfaction surveys) are collected, analyzed, and shared with the public in the company's annual Sustainability Report in line with the requirements of global sustainability indices.

# 05 Related Documents and Attachments

This policy establishes the main framework for ODAŞ's People and Culture processes. The documents listed below contain the detailed implementation principles, procedures, forms, and guidelines of this policy.

### 5.1. Core Policies and Procedures Referenced
- ODAŞ's People and Culture Procedures
- ODAŞ's Human Rights Policy
- ODAŞ's Ethics and Hotline Policy
- ODAŞ's Policy on the Protection of Personal Data and Information Security
- ODAŞ's Environmental Policy
- ODAŞ's Occupational Health and Safety Policy
- ODAŞ's Supply Chain and Compliance Policy

### 5.2. Relevant Procedures and Practices
- Recruitment Procedure and Management
- Career Management Policy

**EFFECTIVE DATE: 25.07.2025**

- Performance Management Policy
- Learning and Development Procedure
- Career Management (Promotion, Rotation, Transfer) Procedure
- Remuneration and Fringe Benefits Management Procedure
- Learning and Development Procedure
- Employee Relations Management Procedure
- Remuneration and Fringe Benefits Procedure
- Termination of Employment Contract Procedure

## 5.3. Forms and Additional Documents

- Personnel Information Form
- Job Application Form
- Interview Assessment Form (Including sustainability criteria)
- Trial Period Assessment Form
- Performance Assessment Form (including ESG Integrated KPIs)
- Annual Training Requirements Analysis Form
- Annual Training Plan (including Sustainability Module)
- Training Participation and Evaluation Forms
- Training Request Form
- Leave Request Form
- Overtime Approval Form
- Travel and Expense Form
- Disciplinary Investigation Record
- Ethics Reporting Form
- Concern Registration Form
- Personnel Exit Form
- Employee Satisfaction Survey (with ESG Questions Integrated)
- Orientation Handbook (Focused on Sustainability and Occupational Health and Safety)
- Job Descriptions and Competencies Required for the Positions (including ESG responsibilities)
- Career Development Plan Template ( Focused on Sustainability)
- Promotion Request Form
- Reference Check Form
- Job Offer Form
- Vehicle Usage and Delivery Form

## 5.4. Digital Platforms

- **ODAŞ Website:** ODAŞ's official web platform (https://www.odas.com.tr) is the primary communication channel providing current corporate information, policy documents, and digital services to both external stakeholders and employees.

- **People and Culture Information System:** The main platform where all personnel records, trainings, performance data, leave requests, and payroll are managed digitally.

- **ODAŞ Intranet Portal:** A digital communication channel through which policies, procedures, and announcements are communicated to employees.

- **ODAŞ Ethics Hotline (Independent Channel):** A digital platform where ethical violations are reported confidentially and securely.

# 10 Enforcement

ODAŞ's People and Culture 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 and People and Culture Supreme Board are responsible for implementing, monitoring, and assessing the effectiveness of the policy. Within this scope, ODAŞ Ethics Committee and People and Culture Supreme Board identify risks in the implementation of policies, review the received ethics reports, monitor the system's effectiveness regarding violations, and recommend 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.

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