



## **HUMAN RIGHTS POLICY**

### **1. Aims and Scope**

Nadir Metal Rafineri Sanayi ve Ticaret A.Ş. (“**Nadir Metal**” and “**Company**”) adopts a mentality that respects human rights in its activities, in which the Company carries out with its economic, environmental and social efficiency and sustainability-oriented approach and maintains this mentality in relations with its employees and all stakeholders with whom it has a business relationship, and aims to ensure the oversight of basic human rights throughout the society. In this scope, Nadir Metal has adopted Nadir Metal Human Rights Policy (“**The Policy**”).

**1.1.** The Universal Declaration of Human Rights, United Nations (UN) Global Compact, UN Convention on the Rights of the Child, International Labor Organization (ILO) Conventions, UN Guiding Principles on Business and Human Rights, OECD’s Guidelines for Multinational Enterprises and national laws form the basis for this Policy.

**1.2.** The Policy covers business partners, suppliers and the employees in particular. Nadir Metal conveys the rules specified in the Policy to its employees in annual trainings. The Company notifies about the Policy and includes it in the contracts in order to encourage its employees, as well as its business partners and suppliers, to act in accordance with the principles contained in this Policy.

### **2. Principles, Undertakings and Relevant Practices**

Within the scope of the Policy;

#### **2.1 Respecting Human Rights**

Nadir Metal respects universal human rights and aims to prevent human rights violations in accordance with the Universal Declaration of Human Rights. In addition, the Company respects the rights of local peoples in the countries where it operates, by referring to the United Nations Declaration on the Rights of Indigenous Peoples. Nadir Metal is committed to treating its workforce, affected communities and all people with whom it interacts with respect for human rights. The Company has adopted the principle that all its employees and sub-employers deserve respectful behavior and attitudes and in this context, they shall be protected from all kinds of discrimination or abusive working conditions. The Company believes that it can and should contribute positively to human rights by strengthening the community capacity.

#### **2.2 Equal Opportunity, Respecting the Differences and the Diversity**

Nadir Metal exhibits an equal attitude during human resources processes such as remuneration, recruitment, career, personal and professional development and in the work environment among employees without any discrimination based on gender, language, religion, race, national and ethnic origin, age, sexual orientation, gender identity or expression, nationality, marital status, family status, pregnancy, disability, genetic characteristics or any other qualification that indicates a discretionary approach and that is not related to the job performance of the individual. The Company does not discriminate its employees on grounds of union membership, political opinion and similar issues, and does not tolerate discrimination regarding these matters. While maintaining the approach towards employees with the principle of “right person for the right job”, Nadir Metal

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manages these processes transparently depending on the quality, experience and performance of the employees. Nadir Metal respects the diversity, which constitutes an important element of organisational structure.

Nadir Metal shall develop employment, supply chain, training and social investment programs in order to support the socio-economic empowerment of women employees in the Company and to eliminate obstacles to the improvement of women and equal opportunities in the workplaces.

### **2.3 Right to Collective Bargaining and Freedom of Organization**

Nadir Metal respects the employees' right to form association, organization and collective bargaining in the framework of legislative regulations.

### **2.4 Freedom of Expression**

Nadir Metal adopts the principle to prevent any kind of situation which could disrupt the right to exercise freedom of expression in the workplace.

### **2.5 Working under Healthy and Safe Conditions**

Nadir Metal considers as one of its priorities to provide all employees with the workplace where they can work safely and with satisfaction and takes action in accordance with "zero accident" policy. The Company pays regard to the full compliance with international principles and national law and legislation in regards with occupational health and safety, undertakes to offer beyond the legal obligations.

### **2.6 Prevention of Degrading Treatment**

Nadir Metal does not tolerate any kind of degrading treatment, intimidation and abuse against employees in the workplace.

### **2.7 Forced Labor and Human Trafficking**

Nadir Metal strictly prohibits forced labor and human trafficking.

### **2.8 Labor Practices**

Nadir Metal complies with rules set forth in the Fundamental Principles and Rights of Work declared by International Labor Organization and it is sought that the stakeholders apply the working conditions in a safe and humane manner, and that their employees receive the wages they deserve in a fair and equitable manner.

### **2.9 Criminal Acts**

Nadir Metal does not take any initiatives that may result in a crime or violation of rights in the countries where the Company operates.

### **2.10 Stakeholder Feedbacks**

Nadir Metal pays attention to the feedback and opinions of the stakeholders. Feedbacks and

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violations related to the Policy can be reported using one of the communication channels stated below. These notifications comply with the laws on protection of personal data.

E-mail Adress: [etik@nadirmetal.com.tr](mailto:etik@nadirmetal.com.tr)

Adress: **NADİR METAL RAFİNERİ SAN. VE TİC. A.Ş.**

İstanbul Vizyonpark Genel Merkez Plaza

Yenibosna Merkez Mahallesi Kuyumcular Sokak

No:4 İç Kapı No:110

Bahçelievler - İstanbul / Türkiye

Phone number : +90 212 886 7330

### **3. Compliance, Monitoring, Inspection and Reporting**

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

**3.2.** Nadir Metal determines the potential human rights problems that may arise from the Company's operations and the groups that will be most affected by these problems. In the event that a situation which has a negative impact on human rights occurs, the Company shall try to reduce and prevent these effects. In case that human rights are at risk, necessary measures shall be taken by contacting the authorities.

**3.3.** In order to report violations of compliance with the Policy, a system shall be established in which the identity of the whistleblower will be kept confidential. Managers, employees and those acting on behalf of the Company are required to comply with the Policy, as well as to report any violations or possible violations to their relevant managers and/or report them through company complaint channels.

**3.4.** The Policy shall be reviewed by the Legal and Compliance Department at least once every 5 (five) years and the implementation of the Policy shall be tracked. In case of receiving feedback from stakeholders, the Legal and Compliance Department shall take immediate action and review the Policy instead of waiting for the above-mentioned period to run out. For significant product, service and operation changes, the review process shall be run without waiting for the above-mentioned period.

### **4. Resolution of Non-Compliance with the Policy**

**4.1.** The issues in all other policies, procedures, processes, practices, products and activities that are considered to contain the risk of conflicting with the Policy or making the implementation of the Policy problematic shall be reviewed.

**4.2.** Within the scope of the Policy, formal and informal grievance mechanisms are to be developed to compensate for possible violations of rights that may arise from the activities of Nadir Metal.

**4.3.** The Legal and Compliance Department may seek expert opinion if the department deems it necessary, and may benefit from experts by taking measures that will not violate the principles of confidentiality during the investigation. All information and documents requested by the Legal and Compliance Department during the investigation shall be given to the Board. All employees are obliged to assist the Legal and Compliance Department in this regard.

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**4.4.** No retaliation shall be made against any employee who raises concerns within the scope of the policy, and notifications shall be handled through processes in which the confidentiality shall be preserved. Policy violations may result in disciplinary penalty and/or criminal penalty, such as termination of employment contract, suspending and/or halting work with suppliers/customers (business partners).

### **5. Effective Date**

The Policy was accepted by the Board Of Executives and came into force on 13 October 2021.

### **6. Public Disclosure**

The Policy has been disclosed to all stakeholders, including all employees, and to the public, in Turkish and English. The same obligations apply in case of any change in the Policy.

