



HUMAN RIGHTS POLICY

1. PURPOSE AND SCOPE

Nadir Metal Rafineri Sanayi ve Ticaret A.Ş. ("**Nadir Metal**" or "**Company**") strives to ensure that fundamental human rights are respected across the community by putting respect to human rights at the core of any engagement with its employees and business partners in a manner which is aligned to both national and international regulations as well as the Company's ethical principles and values during its activities carried out with sustainability in mind.

This Policy draws upon international regulations and national laws, including in particular the Constitution of the Republic of Turkey, the Universal Declaration of Human Rights (1948), the International Covenant on Economic, Social and Cultural Rights (1966), the International Covenant on Civil and Political Rights (1966), the UN Global Compact, the UN Convention on the Rights of the Child, the International Labour Organization (ILO) Conventions, the ILO Declaration on Fundamental Principles and Rights at Work, Worst Forms of Child Labour Convention (ILO Convention no. 182), the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

The Company has developed this Human Rights Policy ("**Policy**") to encourage its employees and business partners to act in accordance with the principles described herein.

DEFINITIONS

External stakeholder	Any business partner which the Company engages with; any supplier which provides goods and services for or on behalf of the Company; any non-governmental organization, public institution or organization, or any type of representative acting on behalf or for the account of the Company
Internal stakeholder	Any person, group or related/affiliated organization (if any) within the Company which affects or is affected by the Company. (E.g. employees, all managers including the board of directors.)
Business partners	Any customer/supplier or any representative/dealer/sub-contractor acting on behalf or for the account of the Company.
Human rights	Rights inherent to all human beings, regardless of any difference which may include but is not limited to gender, religion, language, race, age, nationality, sexual orientation, pregnancy, difference of thought, political view, and wealth.
The UN	The United Nations
The UN Global Compact	The 10 principles of the UN Global Compact are derived from universally recognized declarations in the areas of human rights, labor, the environment, and anti-corruption. The UN Global



Compact calls on businesses to comprehend, promote and implement these principles for sustainability purposes.

ILO

International Labour Organization ¹

Worst Forms of Child Labour Convention

The ILO Convention no. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour

ILO Declaration on Fundamental Principles and Rights at Work

All Members, even if they have not ratified the Conventions in question, have an obligation, arising from the very fact of membership in the Organization, to respect, to promote and to realize, in good faith and in accordance with the Constitution, the principles concerning the fundamental rights which are the subject of those Conventions, namely:

- freedom of association and the effective recognition of the right to collective bargaining;
- the elimination of all forms of forced or compulsory labor;
- the effective abolition of child labor; and
- the elimination of discrimination in respect of employment and occupation.

Retaliation

Any type of adverse action taken by an employer against an employee in order to dissuade that employee from raising an actual or potential violation to the employer or from fulfilling their legal obligation to report a such violation.

2. PRINCIPLES, COMMITMENTS AND RELEVANT PRACTISES

The Company respects universal human rights and is committed to preventing violations of human rights in accordance with the Universal Declaration of Human Rights.

Opposing any action that is against human rights, including but not limited to any forms of torture, forced labor, child labor, and worst forms of child labor, other gross human rights violations and abuses such as widespread sexual violence, war crimes, crimes against humanity, racism, and discrimination, the Company is committed to upholding human rights in line with its corporate principles and its responsibilities under both national and international regulations.

¹ https://www.ohchr.org/sites/default/files/UDHR/Documents/UDHR_Translations/trk.pdf

² <https://www.unglobalcompact.org/what-is-gc/mission>

³ <https://www.ihd.org.tr/birlesmis-milletler-is-dunyasi-ve-insan-haklarina-dair-rehber-ilkeler>

⁴ <https://www.ilo.org/global/lang-en/index.htm>



The Company adheres to the principles listed below while conducting its commercial activities and also expects all of its business partners and internal stakeholders to carry out their business and act in a manner that protects and is respectful to human rights.

2.1. Employment

The Company pays strict attention to ensure that its activities are not associated with:

- any forms of child labor, forced or compulsory labor, slavery, human trafficking, or
- discrimination in employment or occupation or discrimination towards minorities, other vulnerable groups or women,

and adopts a "zero tolerance" to such practices.

2.2. Equal Opportunity, Respecting Differences and Diversity

Both during its human resources processes such as remuneration, employment, career, personal and professional development and within the work environment, the Company treats its employees on a fair and equal basis without making any discrimination based on gender, language, religion, race, ethnic origin, age, sexual orientation, gender identity or expression, nationality, marital status, personal status, pregnancy, disability, genetic information or on any other arbitrary basis which is not associated with an employee's performance at work, union membership, political view or other similar factors. The Company respects diversity and views it as a key element of the Company's organizational structure.

Nadir Metal promotes the socio-economic empowerment of its female employees. The Company supports employment and supply chain programs in order to remove barriers which hinder women from advancing in their careers and enjoying equal opportunities.

2.3. Operating in Accordance with Legal Regulations

The Company complies with the legislation of all countries in which it has operations. It also expects its partners to comply with the legislation applicable in their respective countries.

2.4. Right to Collective Bargaining, Freedom of Association and Organization

The Company respects the freedom of association, assembly and organization, and the collective bargaining rights of employees.

2.5. Prevention of Harassment, Mobbing, ill-treatment, and Violence

Nadir Metal does not tolerate incidents such as harassment, mobbing, maltreatment and violence toward employees and adopts a "zero tolerance" approach against such incidents.



2.6. Freedom of Expression

The Company strives to eliminate any barriers that may prevent the employees from exercising their freedom of expression at work and provides an appropriate environment so that employees can express themselves.

2.7. Healthy and Safe Work

One of the top priorities of the Company is to provide an appropriate work environment and conditions which allow all employees to do their job in a safe, healthy, and happy manner. The Company takes all necessary measures to minimize the risk of accident and injury as part of its "zero accident" goal during all of its activities. The Company ensures complete compliance with national legislation and international principles regarding occupational health and safety (OHS).

2.8. Workforce Practices

The Company follows the fundamental rules specified in the ILO Declaration on Fundamental Principles and Rights at Work and strives to ensure that all of its stakeholders to earn their remuneration in a fair manner by working under safe and decent conditions.

2.9. Ethics

In line with its corporate memory and core values, Nadir Metal displays fair treatment to its employees, conducts business with integrity and complies with applicable legislation. By respecting human rights and adopting the "economy for people" model for a better sustainable world, the Company leads environmental-friendly operations and takes all legal measures to prevent money laundering, financing of terrorism, and bribery and corruption.

2.10.Environment

Nadir Metal handles issues related to health, safety, water and waste management, climate change and preservation of biodiversity with great care to help people lead a sustainable life. The Company strives proactively to protect the environment and to reduce the environmental load and encourages its stakeholders to improve their environmental performance.

2.11. Criminal Acts

Nadir Metal does not engage in actions that could result in criminal acts or violation of rights in its countries of operation. Nadir Metal adopts a "zero tolerance" approach against such acts or violations.

3. Compliance, Monitoring, Auditing and Reporting

3.1. The General Manager and the Board of Directors are responsible for enforcing the Human Rights Policy.



3.2. The Board is also responsible for identifying and operating the notification, review and enforcement mechanisms where the human rights policy, rules and regulations are not followed.

3.3. Nadir Metal takes into consideration the possible human rights issues which may arise during its operations and the groups that could be affected the most by these issues. Where human rights are adversely affected, the Company tries to reduce and prevent such adverse effects. If a human right risk is present, necessary measures are taken by engaging with related authorities.

3.4. The Legal and Compliance Department is responsible for monitoring the implementation of the Policy.

4. Resolution of Conflicts

4.1. In the event that this Policy is in conflict with any policy, procedure, process, practice and/or activity of the Company or makes it difficult to implement them, the Policy and affected items in question are reviewed.

4.2. Official and unofficial grievance mechanisms are developed according to this Policy to correct violation of rights which may result from the Company's activities.

4.3. The Legal and Compliance Department investigates incoming complaints. When necessary, the Department may consult expert opinion and utilize experts by taking appropriate measures to maintain confidentiality during the investigation process.

4.4. All information and documents requested by the Legal and Compliance Department during an investigation are provided to the Board of Directors. All employees are required to cooperate with the Legal and Compliance Department for these purposes.

4.5. There will be no retaliation against any employee who voices their concerns according to this Policy, and their feedback will be handled without violating confidentiality.

4.6. Violation of this Policy may result in penalties such as disciplinary action and/or termination of employment contract, suspension or discontinuation of engagement with business partners at the discretion of the Company.



5. Stakeholder Feedbacks

We value and pay attention to any feedback and opinions of stakeholders on this Policy. Feedback on, and violations of, this Policy can be communicated through any of the following channels. We comply with the personal data protection laws when handling such feedback.

E-mail : etik@nadirmetal.com.tr and/or compliance@nadirmetal.com.tr

Address : İstanbul Vizyonpark Genel Merkez Plaza Yenibosna Merkez Mahallesi Kuyumcular Sokak No:4 İç Kapı No:110 Bahçelievler -İstanbul / Turkey

Phone : +90 212 886 7330

6. Effective Date

This Policy has been accepted and put into force by the Board of Directors on 05.04.2022.

7. Public Information

This Policy is announced and made available in Turkish and English to all stakeholders and employees on www.nadirmetal.com.tr. Where any change is made in this Policy, the revised version will be announced and made available in the same way.

Date of Board of Directors' Decision	Version No
13.10.2021	(1)
05.04.2022	(2)

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