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Opet Fuchs Madeni Yağ Sanayi ve Ticaret A.Ş.  
Human Rights Policy

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## 1. Purpose and Scope

This Human Rights Policy (“the Policy”) is a guide that reflects Opet Fuchs’ approach and standards with respect to human rights and demonstrates the importance that Opet Fuchs attaches to respect for human rights.

All employees, directors and officers of Opet Fuchs shall comply with this Policy. Opet Fuchs also expects and takes the necessary steps to ensure that all of its Business Partners - to the extent applicable - comply with and/or act in accordance with this Policy..

## 2. Definitions

“**Business Partners**” includes suppliers, distributors, dealers, authorized services and other third parties with whom the company has a business relationship and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company, as well as their employees and representatives.

“**Human Rights**”, refers to the rights peculiar to all people regardless of gender, race, colour, religion, language, age, nationality, difference of opinion and wealth, and contains the right to an equal, free and dignified life.

“**Koç Group (Koç Topluluğu)**” refers to all companies that are directly or indirectly controlled by Koç Holding A.Ş either alone or jointly and business partners (Joint Ventures) that are contained in the consolidated financial report of Koç Holding A.Ş.

“**The ILO**” means The International Labor Organization

“**The ILO Declaration on Fundamental Principles and Rights at Work**” is a ILO declaration adopted that commits all member states whether or not they have ratified the relevant Conventions, to respect, and promote the following four categories of principles and rights in good faith:

- freedom of association and effective recognition of collective bargaining,
- Elimination of all forms of forced or compulsory labor,
- abolition of child labor,
- Elimination of discrimination in employment and occupation.

“**OECD**” refers to the Organisation for Economic Cooperation and Development.

“**OECD Guidelines for Multinational Enterprises**”<sup>1</sup> aims to develop a state-sponsored corporate responsibility behavior that will maintain the balance between competitors in

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<sup>1</sup> <http://mneguidelines.oecd.org/annualreportsontheguidelines.htm>

the international market, and thus, increase the contribution of multinational companies to sustainable development.

“**Opet Fuchs**” refers to Opet Fuchs Madeni Yağ San. Tic. A.Ş.

“**The UN**” means the United Nations.

“**The UN Global Compact**”<sup>2</sup> is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption.

“**The UN Guiding Principles on Business and Human Rights**”<sup>3</sup> is a set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations.

“**The Universal Declaration of Human Rights (UDHR)**”<sup>4</sup> is a milestone document in the history of human rights, drafted by representatives with different legal and cultural backgrounds from all regions of the world, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected.

“**The Women’s Empowerment Principles**”<sup>5</sup> (WEPs) a set of Principles offering guidance to business on how to promote gender equality and women’s empowerment in the workplace, marketplace and community. Established by UN Global Compact and UN Women, the WEPs are informed by international labor and human rights standards and grounded in the recognition that businesses have a stake in, and a responsibility for, gender equality and women’s empowerment.

“**Worst Forms of Child Labour Convention (Convention No. 182)**”<sup>6</sup> means the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour.

### 3. General Principles

As an organization carrying out its activities on a global scale, Opet Fuchs is guided by the Universal Declaration of Human Rights (UDHR) and maintains a respectful understanding of Human Rights for its stakeholders in the countries where it operates.

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

<sup>3</sup> [https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>4</sup> <https://www.un.org/en/universal-declaration-human-rights/>

<sup>5</sup> <https://www.weeps.org/about>

<sup>6</sup> [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C182](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182)

Creating and maintaining a positive and professional working environment for its employees is the main principle of Opet Fuchs. Opet Fuchs acts in accordance with global ethical principles in areas such as recruitment, promotion, career development, wages, benefits and diversity, and respects the rights of its employees' to form and join organizations of their choice. Forced and child labor as well as all forms of discrimination and harassment are expressly prohibited.

Opet Fuchs primarily adheres to following international human rights standards and principles :

- The ILO Declaration on Fundamental Principles and Rights at Work (1998),
- The OECD Guidelines for Multinational Enterprises (2011),
- The UN Global Compact (2000),
- The UN Guiding Principles on Business and Human Rights (2011),
- The Women's Empowerment Principles (2011).
- Worst Forms of Child Labour Convention (Convention No. 182), (1999)

#### **4. Commitments**

Opet Fuchs respects the rights of its employees, directors, officers, shareholders, Business Partners, customers, and any other individuals affected by its operations, products or services by complying with the principles of the Universal Declaration of Human Rights (UDHR) and the ILO Declaration on Fundamental Principles and Rights at Work.

Opet Fuchs is committed to treating all employees honestly and fairly and to providing a safe and healthy working environment that respects human dignity while avoiding discrimination.

Opet Fuchs may also apply additional standards that take into account vulnerable and disadvantaged groups that are more susceptible to negative Human Rights impacts and require special attention. Opet Fuchs takes into account the specific circumstances of groups whose rights are further elaborated in United Nations instruments: indigenous peoples; women; ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families, as referred to in the UN Guiding Principles on Business and Human Rights..

## **Diversity and Equal Recruitment Opportunities**

Opet Fuchs is committed to employing people from diverse cultures, professional experiences and backgrounds. Recruitment decisions are based on job requirements and personal qualifications regardless of race, religion, nationality, gender, age, marital status or disability

## **Prevention of Discrimination**

Zero tolerance towards discrimination is a key principle in the entire employment process, including promotion, assignment and training. Opet Fuchs expects all its employees to show the same sensitivity in their behavior towards each other.

Opet Fuchs strives to treat its employees equally by providing equal rights and opportunities. All forms of discrimination and disrespect based on race, gender, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition or political opinion are unacceptable.

## **Zero Tolerance Against Child Labour and Forced Labour**

Opet Fuchs strongly opposes child labor, which causes children's physical and psychological harm to children, and interferes with their right to education. In addition, Opet Fuchs opposes all forms of forced labor, which is defined as work that is performed involuntarily and under the threat of any penalty.

In accordance with the conventions and recommendations of the ILO, the Universal Declaration of Human Rights, and the UN Global Compact, Opet Fuchs has a zero-tolerance policy towards slavery and human trafficking and expects all its Business Partners to act accordingly.

## **Freedom of Unionisation and Collective Bargaining**

Opet Fuchs respects the right and freedom of choice of its employees to join a trade union, and to collectively bargain collectively without fear of retaliation. Opet Fuchs is committed to a constructive dialogue with the freely chosen representatives of its employees, represented by a legally recognized trade union.

## **Health and Safety**

Protecting the health and safety of employees, and other persons who are present in a work area for any reason is one of the main concerns of Opet Fuchs. Opet Fuchs provides a safe and healthy working environment. Opet Fuchs take the necessary safety measures in the workplace in a manner that respects the dignity, privacy, and reputation of each individual. Opet Fuchs complies with all relevant regulations and implements all necessary safety measures in all its work areas.

If any unsafe conditions or unsafe behavior are detected in the work areas, Opet Fuchs companies shall immediately take the necessary measures to ensure the health, safety, and security of their customers and employees.

## **No Harassment or Violence**

A key aspect of protecting the personal dignity of employees is ensuring that harassment or violence does not occur or, if it does occur, sanctioned adequately. Opet Fuchs is committed to providing a workplace free from violence, harassment, and other unsafe or disturbing conditions. As such, Opet Fuchs does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse, or threats

## **Working Hours and Wages**

Opet Fuchs respects the legal working hours in accordance with the local regulations of the countries in which it operates. It is important for employees to have regular breaks, vacations, an effective work-life balance.

Wages are determined in a competitive manner according to the relevant sectors and the local labor market, and where applicable, in accordance with the terms of collective bargaining agreements if applicable. All compensation, including social benefits are paid in accordance with the applicable laws and regulations.

Employees may request further information on the the laws and regulations governing working conditions in their own countries from the Assistant General Manager (Finance & Compliance) and/or Management Systems, Risk and Compliance Department.

## **Personal Development**

Opet Fuchs provides its employees with opportunities to develop their talents and potential, and to enhance their skills. Considering human capital as a valuable resource, Opet Fuchs strives for the comprehensive personal development of its employees by supporting them with internal and external trainings.

## **Data Privacy**

In order to protect the personal data of its employees, Opet Fuchs maintains high data protection standards. The data protection standards are implemented in accordance with the relevant legislations.

Opet Fuchs expects its employees to comply with the data protection laws of each of the country in which it operates.

## **Political Activities**

Opet Fuchs respects the legal and voluntary political participation of its employees. Employees may make personal donations to a political party or a political candidate or engage in political activities outside working hours. However, it is strictly forbidden to use company funds or other resources for such donations or any other political activities.

## **5. Authority and Responsibilities**

All employees and directors of Opet Fuchs are responsible for complying with this Policy, implementing and supporting the relevant Opet Fuchs company's procedures and controls in accordance with the requirements of this Policy. Opet Fuchs also expects and takes necessary steps to ensure that all its Business Partners to the extent applicable, comply with and/or act in accordance with this Policy. .

If there is a discrepancy between the local regulations, applicable in the countries where Opet Fuchs operates, and this Policy, the stricter of the two shall prevail, unless such practice is in violation of the relevant local laws and regulations.

If you become aware of any action that you believe is in violation of this Policy, applicable legislation or the Ethical Principles of Main Shareholders or Opet Fuchs, you may contact or report this matter to your manager, who is one lever higher in rank than you. Besides, it is possible to notify or consult to the Assistant General Manager (Finance & Compliance) through Notification Hotline of Opet Fuchs, available at the following

address: "<https://ihbar.opetfuchs.com.tr/>". If you are not an Opet Fuchs employee then, you may forward your notices and notifications to [uyum@opetfuchs.com.tr](mailto:uyum@opetfuchs.com.tr). Alternatively, you may report the incident to Koç Holding Ethics Line "[koc.com.tr/ihbarbildirim](https://koc.com.tr/ihbarbildirim)" or Fuchs Report Line <https://www.bkms-system.net/FUCHS-Compliance-Communication>.

Opet Fuchs employees may contact the Human Resources Department for their questions regarding this Policy and its application. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

## 6. Revision History

This Policy takes effect on 01.12.2021 as of the date approved by the Board of Directors and will be maintained by the Human Resources Directorate.

Revision	Date	Explanation
No:1	01.04.2024	The alphabetical order of the Definitions are corrected.