

TÜRK TELEKOM GROUP HUMAN RIGHTS POLICY

PURPOSE AND BASIS

This Human Rights Policy (“the Policy”) is developed to raise the awareness of Türk Telekom Group employees and its business partners, including its suppliers, on human rights as well as to describe the rules to be followed.

United Nations Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the United Nations Convention on the Rights of Persons with Disabilities, the Convention on the Rights of the Child, the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, the Constitution of the Republic of Türkiye, International Labour Organization (ILO) Conventions, other conventions ratified by the Republic of Türkiye, and national legislation applicable to human rights and work life constitute the basis for the Türk Telekom Group Human Rights Policy.

SCOPE

This policy covers managers and employees at all levels, including members of the Board of Directors of Türk Telekom. Türk Telekom expects its suppliers and business partners to comply with this policy and encourage their employees to do so. Accordingly, provisions undertaking to comply with Türk Telekom Group Human Rights Policy are added to all contracts made with suppliers and business partners.

Türk Telekom Group (TT Group) Subsidiaries develop their own policies and processes based on TT Group Human Rights Policy.

RESPECT AND COMMITMENT TO HUMAN RIGHTS

Human rights and freedoms are fundamental rights which are enjoyed by all human beings. Every person is entitled to these rights without any discrimination on the grounds of age, language, race, colour, ethnicity, nationality, health, disability, gender, marital status, religion and sect, political opinion, philosophical understanding and belief, etc.

Türk Telekom employees respect human rights. Türk Telekom Group Human Rights Policy is the main reference document. Türk Telekom Business Ethics Code, approved by the Board of Directors and disclosed to the public, is an integral part of this policy.

Adopting respect for human rights as one of its core values, Türk Telekom respects the fundamental human rights enshrined in the United Nations Universal Declaration of Human Rights and the material and spiritual existence of human beings, and undertakes to create a suitable working environment and to conduct all its activities in this direction. In case of requests that would violate human rights, it aims not to be a party to human rights violations, directly or indirectly. It recognises that human rights violations may not be illegal in some cases but may still have adverse impacts on Türk Telekom’s stakeholders.

In line with this objective Türk Telekom,

- Informs and trains its employees and managers on the Human Rights Policy.

- Undertakes to provide fair and reasonable remediation or to cooperate for remediation in case of violation of this policy.
- Considers opinions of its employees, customers, and all its stakeholders on human right issues.
- Endeavours to remedy violations and their adverse impacts, if it is found to share responsibility for human rights violations committed by its suppliers and business partners.
- Makes its products and services equally available to all individuals on the basis of fundamental rights and freedoms. It ensures that everyone can benefit from customer service and all after-sales services on equal terms.

ACCEPTING DIFFERENCES

Türk Telekom values diversity and considers this as an asset and strives to make its employees feel that they are a part of the Company.

In line with this objective, Türk Telekom,

- is committed to equal opportunity, and the employee's qualifications, performance, skills and experience are considered in recruitment, placement, development, training, remuneration, promotion and leave of employment.
- Strives to recruit candidates with different backgrounds and experiences, to develop these employees and to employ them for a long time with the awareness that diversity and differences in the workforce contribute to the achievement of the Company's goals.
- Complies with its legal obligations regarding the employment of disabled and disadvantaged persons.

DISCRIMINATION AND HARASSMENT

At Türk Telekom,

- No one is discriminated against on the basis of age, language, race, ethnicity, nationality, health, pregnancy, disability, gender, marital status, religion and sect, political opinion, philosophical understanding and belief.
- Discriminatory and unfair conducts are not tolerated. Employees are provided with a working environment free from all kinds of mistreatment, mobbing and harassment.
- A business conduct that respects the human rights and the individuality of employees is adopted. Employees are encouraged to reject discriminatory behaviour and to express even the slightest discomfort about this issue without fear of retaliation.

FREEDOM OF EXPRESSION AND ASSOCIATION

Türk Telekom,

- Respects freedom of expression of its employees and does not tolerate any act preventing exercise of freedom of expression.
- Supports the rights of its employees to organize meetings, to unionize and to form associations under the applicable law.
- Attaches importance to the creation of a working environment that encourages cooperation and mutual respect.
- is committed to establishing a constructive dialog with the representatives of the union which is elected by the employees.
- Aims to develop social dialogue and labour peace with the labour unions.

- Ensures that the opinions, suggestions and feedback collected at different periods in order to understand the experiences, needs and expectations of employees about the company are reported to the Türk Telekom Business Ethics Committee and that the Committee's preventive and corrective decisions are implemented. With this structure, Türk Telekom assures its employees that there will be no retaliation and gives them the opportunity to participate in management.

FORCED LABOUR, CHILD LABOUR AND CHILDREN'S RIGHTS

Türk Telekom rejects all forms of forced labour, including drudgery, child labour, employment of illegal immigrants and foreign nationals without work permits, debt bondage and all practices of human trafficking and modern slavery. Individuals under the age of 18 are not employed and Türk Telekom complies with international conventions ratified by the Republic of Türkiye on children's rights and national legislation. These practices are open to the scrutiny of public authorities.

Türk Telekom is committed to taking the necessary measures to ensure an environment that respects the fundamental rights and freedoms of employees working on its behalf at every stage of its business and operations.

Since children are vulnerable in today's digital world, Türk Telekom is committed to protecting children's rights and to support its customers with applications such as safe internet and family membership to prevent children from being exposed to harmful content.

WOMEN EMPLOYMENT AND MOTHERHOOD

Türk Telekom,

- Aims to encourage women's participation in business life and increase women's employment in its workplaces.
- Does not discriminate among its employees on the basis of gender, acts honestly and fairly towards all of its employees regarding promotion, demotion, wage increase, training and development, disciplinary practices, termination of employment contract and all other rights, regardless of gender, marital status, pregnancy, and provides equal opportunity to everyone.
- Grants up to six months of unpaid maternity leave and 1.5 hours of milk leave per day to female employees until the child reaches the age of 1 year upon request in addition to the paid leaves before and after childbirth arising from the Labour Law. Expecting or breastfeeding female employees do not work for more than 7.5 hours a day.

WAGES AND WORK HOURS

Türk Telekom;

- Establishes an equal, fair and competitive remuneration policy at levels befitting human dignity by considering the sector, labour market, employee qualifications and the terms of other collective bargaining agreements in the Republic of Türkiye.
- Sets the minimum wage level above the statutory minimum wage.
- Offers competitive opportunities and side benefits to its employees in line with the market conditions, without discrimination among equals.

- Complies with applicable laws, collective bargaining agreements and regulations in the Company's policies on daily and weekly working hours, overtime, breaks, weekends and annual paid leave.

Regularly informs all business units about rules on overtime and audits their implementations.

PROTECTION OF PERSONAL DATA AND LEGAL COMPLIANCE

Türk Telekom acts in accordance with legal regulations in the processing of personal data, takes all necessary administrative and technical measures and complies in all circumstances with the national and international legislation to which it is subject to and with the basic principles for the processing of personal data under all circumstances.

Within this scope Türk Telekom,

- Ensures maximum compliance with the Law No. 6698 on the Protection of Personal Data, based on the principles of lawfulness, honesty, limitation, transparency and accountability in the processing of personal data of its employees, customers and other relevant persons within its field of activity, follows the legislation and the resolutions and guidelines published by the Personal Data Protection Authority and fulfils all its obligations in this regard in the most effective way.
- Develops personal data protection policies and procedures and informs its employees and all data processors without exception and raises awareness through announcements and trainings.
- Attaches importance to the right of privacy in all its activities and avoids all kinds of initiatives and practices that may be considered as a violation of personal rights and privacy.
- Prioritises the privacy of its customers, stakeholders and employees in the technological products and services it uses or will use.
- Aims to maintain the balance between the requests of obtaining information about users and restriction of some services and its responsibility regarding the personal data of its customers within the framework of legal legislation, for the investigation of a judicial case by the competent judicial authorities to protect the public interest, for protecting the national infrastructure or similar legitimate needs.
- As priority goals regarding respect for human rights, adopts providing safe products and services to its employees, stakeholders and customers, processing personal data in accordance with the applicable law and informing the relevant persons clearly and transparently about how their personal data is processed.

OCCUPATIONAL HEALTH AND SAFETY

Contrary to the traditional approach, Türk Telekom considers occupational health and safety as a dynamic process, not as a goal to be achieved, and adopts an initiative-taking and productive management approach putting people at the centre of its investments. Creating a healthy, safe and peaceful working environment is a fundamental responsibility for Türk Telekom and it wants its employees to return home healthy after work.

Accordingly, Türk Telekom,

- Complies with all applicable national and international regulations on occupational health and safety.

- Strives to prevent or reduce occupational accidents and occupational diseases and to create a culture of occupational safety.
- Tries to prevent occupational accidents by registering and evaluating occupational safety risks.
- Conducts projects to control the hazards and risks that may arise in all its workplaces.
- Takes measures regarding the health and safety of its suppliers, business partners and customers at work sites.
- Provides regular trainings to ensure that its employees have sufficient knowledge on occupational health and safety.
- Does not discriminate among its employees, suppliers and employees of its business partners in matters of occupational health and safety. Türk Telekom expects its suppliers and business partners to comply with the standards in this field at the highest level, to manage health and safety risk management and accountability and expects everyone working for or on behalf of Türk Telekom to act in a safe and responsible manner.

ENVIRONMENTAL PROTECTION

Türk Telekom is committed to fulfilling its environmental responsibilities and raising the environmental awareness of individuals, institutions and organisations it interacts directly and indirectly. Türk Telekom establishes and maintains systems based on the efficient use of natural resources and the environment.

Türk Telekom,

- Complies with all national and international legal regulations and other obligations in the field of environment.
- is aware of the environmental impacts of its activities and monitors them regularly. It conducts studies to minimise these impacts and to continuously improve its environmental performance.
- Conducts studies to reduce its carbon footprint systematically and directs its investments in this area.
- Adopts environmentally friendly practices in the supply chain and encourages all its stakeholders in this direction.
- Monitors its water consumption and takes water-saving measures.
- Participates in the Zero Waste Project to prevent the rapid depletion of natural resources.
- Minimises the consumption of energy and natural resources with its environmentally friendly and state-of-the-art products.
- Monitors carbon emissions in its operations and participates in the Carbon Disclosure Project.
- Organises trainings to increase the awareness of its employees on environmental issues and expects all its suppliers and stakeholders to commit to fulfill their environmental responsibilities.

RELATIONS WITH SUPPLIERS AND BUSINESS PARTNERS

Together with its business partners and suppliers, Türk Telekom works in line with ethical rules and supply chain standards.

In order to ensure this, Türk Telekom,

- Builds strong systems and standards in line with its values, shares them with its suppliers and expects its suppliers to comply with them. These standards are included in the Türk Telekom Procurement Procedure, where minimum expectations are described.

- Believes that establishing direct relations with its suppliers is the best way to improve performance. Periodic performances of the segmented suppliers are evaluated by the business unit and procurement teams through the supplier performance evaluation process.
- Adds a commitment clause regarding this policy to the contracts to be made with suppliers.

ASSESSING HUMAN RIGHTS RISKS AND IMPACT MONITORING

Türk Telekom aims to regularly review its Human Rights Policy, monitor, evaluate and manage its potential impacts on society, identify risks related to human rights, communicate with its stakeholders, provide training to its employees and regularly monitor its own performance. It undertakes to follow the approach of preventing, assessing and mitigating human rights risks in the products and services it uses or develops.

Accordingly, Türk Telekom evaluates and identifies current and potential human rights impacts and risks related to,

- A new product, service, technology or updates or changes to existing services,
- Forecasts or expectations of changes that may arise in the sector when penetrating into a new market,
- New partnerships or acquisitions,
- Relationships with suppliers.

Additionally, Türk Telekom,

- Supports the reporting of Human Rights violations, internally or externally, via the Company's Ethical Violation Notification address or Türk Telekom Online Transactions or call centre as soon as possible.
- Reserves the right of its employees to make confidential reporting.
- Treats everyone who reports a violation fairly and does not impose any sanctions due to their reporting.
- Believes that improvement and development processes should be transparent, shares improvements in human rights, maintains dialogue with all stakeholders.
- Monitors the social impacts of any violation of Human Rights.

IMPLEMENTATION

Claims and reports regarding human rights violations are evaluated within the scope of ethical violations and reviewed and concluded in line with the procedures and principles set forth in Türk Telekom Business Ethics Code.

a) Reporting Human Rights Violations

Complaints will be sent to:

- "etik@turktelekom.com.tr" internally or externally,
- Business Ethics and Industrial Relations Group Manager Unit (Mail Address: Türk Telekom Genel Müdürlüğü Ankara Kampüsü Kule Binası 25. Kat 06103 Aydınlikevler/Ankara).

Any complaint filed to the other units and managers of the company are forwarded to the contact addresses above.

b) Roles and Responsibilities

Members of the Board of Directors, and all managers are expected to comply with this Policy, to exert the needed efforts and assume a leading role to ensure that employees comply with it.

Board of Directors is responsible for,

- Approval and implementation of the Human Rights Policy,
- Reviewing reports of the General Manager (CEO) and supervising the implementation of the Policy.

General Manager (CEO) is responsible for,

- Reviewing the annual report prepared by the Assistant General Manager of Human Resources Department on the policy and instructing the relevant units and managers on the findings and preventive and regulatory activities,
- Making assignments on a unit basis to establish the necessary processes for assessing, preventing and mitigating possible human rights risks associated with the Company's products and services and for auditing the Company's compliance with the policy,
- The submission of the annual report on the Human Rights Policy and necessary policy updates to the Board of Directors.

Sustainability Committee is responsible for,

- Conducting studies when necessary for full compliance with the principles set out in the Sustainability Policy with a view to act in line with the Value for Human Focus, which is also included in the Policy, in all activities and business processes,
- Reviewing the necessary updates in the Human Rights Policy,
- Monitoring the company's reporting on compliance with Human Rights and taking decisions to improve practices, when necessary,
- Monitoring the efforts by establishing or ensuring the establishment of sub-working groups when action is required within the scope of sustainability.

Human Resources Assistant General Manager is responsible for,

- Preparing, publishing and implementing the Human Rights Policy, communicating it to the employees, and updating when necessary,
- Obtaining consent from newly recruited employees that they have read, understood and undertaken to comply with the Policy,
- Monitoring and operating policy implementation mechanisms,
- Preparing an annual report on the Human Rights Policy and submitting it to the General Manager (CEO),
- Reviewing this Policy at least once a year in line with the needs.

Legal and Regulation Assistant General Manager is responsible for,

- Developing and updating the Human Rights Policy with Human Resources Assistant General Manager Department,
- Adding provisions to the contracts to be signed with suppliers and business partners to ensure compliance with Türk Telekom Group Human Rights Policy,
- Filing complaints or criminal charges with the Public Prosecutor's Office regarding human rights violations that must be reported to the judicial authorities.

Head of Enterprise Risk and Business Continuity Department is responsible for,

- Identification and assessment of human rights risks,
- Controls to ensure compliance with the Human Rights Policy and mitigate identified risks.

Head of Internal Audit Department is responsible for,

- Considering the risks related to Türk Telekom Group's compliance with the Human Rights Policy in annual audit planning and conducting audits when necessary,
- Handling reported human rights violations as misconduct and investigations, and reporting them to the Company's disciplinary board when necessary.

Türk Telekom Business Ethics Committee is responsible for,

- Ensuring that all complaints are examined/investigated in a timely, fair and sensitive manner by taking measures to ensure the confidentiality and security of persons reporting human rights violations,
- Discussing and deciding on examination/investigation reports according to Principles and Procedures in Türk Telekom Business Ethics Code,
- Taking the necessary measures to correct the detected violation and to ensure compliance with the policy.

Business Ethics and Industrial Relations Group Manager Department is responsible for,

- Publishing the Human Rights Policy, announcing it to employees and updating when necessary,
- The preparation of the annual activity report on the Human Rights Policy in coordination with the relevant units,
- Receiving consent from employees every year that they comply with the Policy,
- The preparation of the content of the mandatory annual training for all employees with the Training Unit for the adoption and internalisation of the policy,
- Conducting the secretariat works of Türk Telekom Business Ethics Committee.

Human Resources Employee Experience and Wage Management Directorate is responsible for,

- Conducting surveys, focus group and one-to-one interviews in order to measure the experiences of employees by receiving their feedback on different issues at different times of the year, and reporting the results of these studies to the Türk Telekom Business Ethics Committee in 4-month periods, thus ensuring the participation of employees in decision-making and implementation.

Türk Telekom Group Employees are responsible for,

- Complying with the Human Rights Policy approved by the Board of Directors,
- Reporting behaviours that violate the Human Rights Policy to the ethical violation notification address.

c) Sanctions against Violations

Human rights violations may result in disciplinary penalties and legal sanctions. In case any violation is detected, sanctions set out in the disciplinary provisions of the relevant Company shall apply. A criminal complaint is filed with the Public Prosecutor's Office for human rights violations that need to be referred to the judicial authorities.

d) Validity and Execution

Türk Telekom Group Human Rights Policy comes into force on the date of its adoption by the Türk Telekom Board of Directors.