



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 internal and external stakeholders 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 UN 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 UN Guiding Principles on Business and Human Rights, ILO conventions such as the ILO Declaration on Fundamental Principles and Rights at Work and ILO Worst Forms of Child Labour Convention, and the OECD Guidelines for Multinational Enterprises.

This Human Rights Policy (“Policy”) has been drawn up to set out the principles and approach of Nadir Metal to human rights. Nadir Metal expects its internal and external stakeholders to act in accordance with this Policy.

DEFINITIONS

External stakeholder

Individuals or organizations that are directly or indirectly affected by or affect the operations of a business. This category can include many different groups, such as customers, suppliers, government agencies, regulators, investors, the community, the media and non-governmental organizations.

Internal stakeholder

: Refers to the acceptance of payments made through the banking system, on behalf of the Company and into the Company accounts, based on receivables that have arisen or will arise within the scope of the Company’s activities.

Business partners

Other businesses or individuals that a business works with to carry out its operations. This category may include suppliers, dealers, distributors, strategic partnerships, collaborating firms, and sometimes customers.

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.



Universal Declaration of Human Rights¹

It is an international document adopted by the United Nations General Assembly on December 10, 1948, which determines fundamental human rights. This document emphasizes that all people are born equal and free, have the right to life, liberty and security, and that discrimination, slavery and torture are prohibited. The UDHR is a universal guide for the development of international human rights law and the prevention of human rights violations.

The UN

The United Nations

The UN Guiding Principles on Business and Human Rights²

Refers to the guiding principles approved by the UN Human Rights Council on 16 June 2011. These principles set out the framework known as “Protect, Respect and Remedy” and require business enterprises to have policies and processes in place, as appropriate to their size and circumstances, to meet their responsibility to respect human rights.

The UN Global Compact³

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

Worst Forms of Child Labour Convention⁴

It refers to the Convention No. 182 on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, adopted by the ILO in 1999, which aims to eliminate the worst forms of child labour. The Worst Forms of Child Labour Convention requires member countries to take immediate and effective measures to ensure the prohibition and elimination of the worst forms of child labour as a matter of urgency and governs the measures to be taken.

ILO Declaration on Fundamental Principles and Rights at Work⁵

It refers to the ILO Declaration adopted in 1998, which states that all member countries, even if they have not ratified the relevant conventions, are obliged to respect, develop and implement the five basic principles set out in these Conventions and listed below, in good faith and as a requirement of the Constitution:

- 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;
- the elimination of discrimination in respect of employment and occupation; and
- A safe and healthy working environment.

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

² https://www.undp.org/sites/g/files/zskgke326/files/2023-06/bhr_ungp_rehberikelerrapor.29.05.23_web.pdf

³ <https://www.unglobalcompact.org/what-is-gc/mission>



Retaliation

- Any type of adverse action taken by an employer against an employee due to that employee raising an actual or potential violation to the employer or fulfilling their legal obligation to report such a 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 all legal regulations.

Opposing any action that is against human rights, including but not limited to any forms of torture, forced labor, 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.

The Company adheres to the principles listed below while conducting its commercial activities:

2.1. Ethics

Built on the core values of “respect for people”, “respect for human rights” and “closeness to the people”, the Company acts with the awareness of its corporate social responsibility and expects all stakeholders to act in accordance with its ethical principles.

2.2. Employment

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

- worst forms of child labor, forced or compulsory labor, slavery, human trafficking, or
 - discrimination in employment or occupation or discrimination towards minorities and other vulnerable groups, or gender discrimination,
- and adopts a “zero tolerance” to such practices.

2.3. 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 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.

2.4. Operating in Accordance with Legal Regulations

The Company complies with the legislation of all countries in which it has operations. It does not engage in any actions that may result in crime or violation of rights, and does not tolerate

⁴ <https://www.ilo.org/tr/resource/182-nolu-en-kotu-bicimlerdeki-cocuk-isciliginin-yasaklanmasi-ve-ortadan>

⁵ <https://www.ilo.org/resource/conference-paper/ilo-1998-declaration-fundamental-principles-and-rights-work-and-its-follow>



anyone in this regard. It expects all stakeholders to comply with the legislation applicable in their respective countries.

2.5. 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.

2.6. 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.

2.7. 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.

2.8. 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).

3. Authority and Responsibilities

3.1. At the highest level, 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 this 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. All employees and managers of Nadir Metal are responsible for complying with this Policy and implementing and supporting the relevant procedures of Nadir Metal. Nadir Metal expects its external stakeholders and business partners to act in accordance with this Policy.

3.5. Grievance mechanisms are developed according to this Policy to prevent violation of rights which may result from the Company’s activities.



3.6. 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.

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

4. Stakeholder Feedbacks

We value and pay attention to any feedback and opinions of stakeholders under this Policy. Feedback on, and violations of, this Policy can be communicated through any of the following channels in accordance with the Whistleblowing Policy. 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 : İkitelli OSB Mah. Atatürk Bulvarı No:114 İç Kapı No:19 Başakşehir, İstanbul/Türkiye

Phone : +90 212 886 7330

5. Enforcement

This Policy is announced to all stakeholders in Turkish and English by publishing it on www.nadirmetal.com.tr. This Policy is updated when necessary by the Legal and Compliance Coordination and with the approval of the Board of Directors.

This Policy has been put into force following the approval of the Board of Directors on 17.10.2025.

Date of Board of Directors' Decision	Version No
13.10.2021	(1)
05.04.2022	(2)
20.05.2024	(3)
23.01.2025	(4)
17.10.2025	(5)