

1.0 PURPOSE

The objective of this policy is to establish the core principles governing Human Resources processes, including recruitment, career management, training and development, reward management, work environment, and employment termination, at Naturel Holding, in alignment with its vision, mission, strategy, culture, and values.

2.0 SCOPE

This policy applies to Naturel Holding and all its subsidiaries, encompassing all employees, management staff, and prospective candidates for employment with Naturel Holding.

3.0 PRINCIPLES AND PRACTICES

We are committed to implementing the best, fair, and collaborative human resources processes and practices, guided by our vision of becoming a sustainable company. In all human resources processes, including recruitment, career management, training and development, reward management, work environment, and employment termination, we uphold an equal and unbiased approach concerning language, religion, nationality, race, ethnic origin, age, gender, marital status, health, disability status, political opinion, union membership, and similar attributes.

We unequivocally reject discrimination and unfair treatment in any form. We provide a work environment free from any form of mistreatment, mobbing, and harassment. We derive strength from diversity and promote inclusion across all areas. We are committed to ensuring that all Naturel Holding employees feel valued and equal, regardless of their gender, age, profession, expertise, experience, or any other potentially discriminatory criteria.

3.1 Recruitment, Promotion and Career Management

At Naturel Holding, the recruitment process is conducted regardless of gender, nationality, faith, or ethnicity, aiming to find and place the most suitable candidates based on corporate culture, company objectives, specific competencies, knowledge, and experience. We ensure that employees take equal advantage of the opportunities offered by the company throughout their working life after recruitment.

Career management at Naturel Holding involves regular assessments and personalized development plans to ensure employees can reach their full potential. We provide continuous learning opportunities and mentorship programs to support career growth and advancement within the organization. We actively encourage and support our employees in their career development endeavors. Our initiatives include training for the general workforce and specifically target non-managers and leaders to cultivate leadership skills for future managerial or leadership roles.

In the selection of employees, promotion, internal transfer, rank reduction, and internal job postings, preference is given to direct internal resource utilization, and selections are made within the organization. Promotion decisions are made by considering seniority, performance, potential, personality, and relationships with other employees after identifying the need for the position. However, religion, language, race, gender,

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sexual orientation, and similar personal preferences are not decisive factors influencing or guiding promotion decisions.

3.2 Training and Development

Naturel Holding aims to provide a developing, meaningful, positive, diverse, and opportunity-filled work environment to unleash the potential and creativity of its employees and support their development throughout their working experience. We focus on continuous development, where all our employees take responsibility for their own development, improve themselves and their work, and managers support and guide their employees through coaching and mentoring.

We support Naturel Holding employees with the knowledge, skills, and competencies they need and will need in today's and tomorrow's business world. Development programs are designed specifically in line with the customized needs of the target groups, from young professionals to executives, based on learning through experience and the implementation of various blended learning methods, in collaboration with the best suppliers in the field. Naturel Holding is committed to providing regular staff and business management training for its managers. This includes comprehensive training programs for current managers on effectively managing their teams and processes.

Naturel Holding is also committed to enhancing the skills of its employees through comprehensive training programs and processes designed to meet the evolving strategic needs of the organization and industry. We provide job-specific training to ensure our employees are equipped with the necessary skills to excel in their roles. Our training initiatives are tailored to the general workforce, focusing on continuous skill development and professional growth.

3.3 Compensation, Performance and Reward Management

Naturel Holding values the contribution of all employees to the company's targets and creates a working environment in which they can demonstrate their performance and potential at the highest level. The performance management system supports company strategies and targets, fosters collaboration, and promotes continuous feedback dialogues and employee development. The system allows for the addition and revision of targets throughout the year.

The performance management system supports a high-performance culture by ensuring objectives are open and transparent, associated with other targets, and include target-oriented dialogue areas between managers and employees, allowing for instant and continuous structured feedback throughout the year. The recognition and reward management process is fair, objective, and supports high performance, centered on employees' contributions and competencies related to their business targets, including rewarding, motivating, and competitive salaries, benefits, and recognition applications.

In line with UNGC, UNWEPs principles, our corporate values of equality, we work in compliance with equal pay of equal work principle. We support and comply with the right to minimum wage and commit to exceed minimum wage in as part of our compensation policy.

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3.4 Health and Safety

We place great importance on health and safety. We commit to reducing risks in our work environment and taking measures to promote health, safety, and well-being by constantly improving our processes. We do not compromise on safety practices, behaviors, or conditions. We expect all our managers and employees to comply with our health, safety, and security regulations, promote a safe and healthy work environment, and improve our health and safety culture. We act in accordance with the legislative Health and Safety framework and regulations.

3.5 Protecting Rights of The Employees and Human Rights

The rights of Naturel Holding employees are protected and managed within the framework of applicable legislation, employment contracts between employees and the employer, and ethical rules.

Employees are treated honestly and fairly, and a non-discriminatory, safe, and healthy working environment is maintained. We respect employees' rights to unionize, freedom of association, and collective bargaining rights. We make every effort to support the personal development of our employees and encourage them to participate voluntarily in social and community activities with a strong sense of social responsibility. All activities are conducted in compliance with applicable laws and regulations. An ethics hotline is actively maintained to enable employees to report any incidents that may involve discrimination or mistreatment in accordance with the principles of confidentiality, ensuring that appropriate actions are taken in response.

The Human Resources Subcommittee is responsible for management of the day-to-day issues relating to Human Rights and reports to the Executive Committee and the CEO. The oversight responsibility is given to Corporate Governance Committee (along with Early Detection of Risk Committee) which directly reports to the Board.

Naturel Holding is committed to ensuring the respect of human rights in all aspects of our operations. We have established comprehensive policies and processes to uphold fundamental human rights, ensuring that all employees, partners, and stakeholders are treated with dignity, fairness, and respect in accordance with international human rights standards.

Human rights expectations are clearly communicated to all stakeholders, eg. to new employees during orientation process, to new business partners in contracting process, etc.

We are committed to identify sector, business and project specific salient human rights issues in entire value chain and to engage with our stakeholders on a regular basis to identify any issues for a timely action to resolve them. We engage with our stakeholders across our value chain using various communication means including regular surveys, visits, meetings, website and social media accounts which are regularly updated.

We commit to inform all employees on our human rights policy and its practices on employment and train all our employees on human rights.

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As a company, where we identify that we have caused or contributed to adverse human rights impacts, we commit to providing for or cooperating in the remediation of such impacts for affected stakeholders.

3.6 Forced Labor, Youth Employment and Prohibition of Child Labor and Children's Rights

Our company develops procedures and practices in strict compliance with all local laws, United Nations International Labor Organization (ILO) standards, and international agreements concerning child labor, forced labor, and youth employment in Turkey and all other countries where it operates, is represented, and manages business activities.

We stand against any form of forced labor, including compulsory work, employment of illegal migrants, and foreign nationals without a work permit, forced labor, debt bondage, and any kind of human trafficking, gender discrimination, illegal child labor, child abuse, and all other abusive or exploitative behaviors related to workers, and conduct all our business processes accordingly.

Individuals under 18 years of age are not hired, and Naturel Holding complies with international conventions on children's rights ratified by the Republic of Turkey, as well as national legislation. These practices are open to inspection by public authorities. Naturel Holding has a strict policy to avoid the use of child labor, ensuring compliance with all relevant legal regulations and industry standards. We expect all our employees and business partners to stand against forced labor, prevent discrimination and harassment, comply with legal working hours for employees, not employ illegal child labor, and treat their employees and partners with dignity and respect.

Our internal stakeholders are informed about children's right of education, health, living, housing, protection against physical, psychological or sexual exploitation, and report any abuse they encounter or are informed about via the Ethical Line.

3.7 Diversity and Opportunity

Naturel Holding is committed to driving diversity and ensuring equal opportunities within our workforce. We have established programs and practices to promote the inclusion and advancement of women, minorities, disabled employees, and individuals of all ages, ethnicities, races, nationalities, and religions.

Naturel Holding has established specific targets and objectives to enhance and promote diversity and equal opportunity within our workplace, each with a defined time frame. These objectives include increasing the representation and advancement of underprivileged groups, from poor background with or without formal high education, women, minorities, disabled employees, and individuals of all ages, ethnicities, races, nationalities, and religions. We are committed to achieving these goals and continuously monitoring our progress to ensure a diverse and inclusive work environment.

3.8 Employee Satisfaction

Naturel Holding regularly measures and reports the overall percentage of employee satisfaction through comprehensive surveys and an employee satisfaction index. Our commitment to understanding and improving employee satisfaction ensures a positive and productive work environment.

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3.9 Work – Life Balance and Community Involvement

Naturel Holding is committed to promoting a healthy work-life balance through various programs and processes designed to support our employees' personal and professional lives. We offer flexible work arrangements, including remote work, flexible working hours, and reduced and compressed work weeks, to ensure our employees can achieve a balanced and fulfilling lifestyle. Naturel Holding is dedicated to supporting its employees by providing access to daycare services. We establish partnerships with local daycare centers to accommodate our employees' needs. Additionally, we offer support for adult, elderly, and disabled care, ensuring comprehensive assistance for our employees' caregiving responsibilities.

Naturel Holding is committed to enhancing its corporate citizenship through active community involvement. We engage in donations, volunteering, philanthropic activities, and community investments. Our corporate social responsibility programs focus on education, and environmental initiatives, reflecting our dedication to making a positive impact on society. Naturel Holding actively fosters employee engagement in voluntary work. We encourage our employees to participate in volunteer services during working hours, whether associated with company projects or in collaboration with NGOs. Our commitment to volunteerism strengthens our community ties and supports the personal growth of our employees.

3.10 Labour Relations Risk Management

We regularly assess risks related to working conditions, wages and benefits, excessive working hours, discrimination, harassment and workplace bullying, forced labor, child labor, occupational health and safety, privacy violations, employee representation mechanisms, and restrictions on freedom of association and the right to collective bargaining that may affect our employees' human rights and labor relations.

In these assessments, we take into consideration the needs of groups that may be at greater risk, including temporary, migrant, and contractor workers. To prevent and mitigate identified risks, we support fair and transparent human resources practices, open communication with employees, training, and accessible grievance mechanisms based on confidentiality and protection against retaliation.

We investigate employee feedback, identified issues, and violations and take the necessary corrective and preventive actions. We ensure that affected employees have access to appropriate remedy mechanisms. We monitor the effectiveness of our practices and report significant findings to the governing bodies.

3.11 Reviewing of Policy

We review our Human Resources Policy once a year, evaluate its effectiveness and make necessary improvements.

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