

Human Resources and Business Ethics Policy

At Promat, it is our fundamental responsibility to provide a fair and transparent working environment that respects the rights of all employees and to adopt ethical, honest and legally compliant business practices.

- We provide equal opportunities to all employees and apply zero tolerance to all forms of discrimination.
- We do not discriminate in recruitment, promotion, remuneration or performance evaluations on the basis of gender, age, ethnic origin, religion, disability or any other personal characteristic.
- We provide a healthy, safe and motivating working environment and offer training and career opportunities to support employee development.
- We adopt fair and transparent practices that strengthen employee motivation.
- We encourage open, trust-based and two-way communication, take employees' ideas and suggestions into consideration, support team spirit and strengthen a culture of collaboration.
- Integrity, transparency and compliance with the law are fundamental principles in all our business processes.
- We apply a zero-tolerance policy towards bribery, corruption, improper gain and attempts to obtain undue benefit. We raise awareness among our employees and business partners and implement systems and controls designed to prevent potential violations.
- We respect employees' freedom of association and their right to join trade unions.
- We adopt a socially and environmentally responsible approach and actively support social responsibility projects.
- We assess environmental and social impacts in our business processes and prioritise sustainable and ethical practices.
- We regularly review our human resources policies and ethical rules and improve them in line with current regulations and best practices.
- We manage working hours, overtime, rest periods and weekly rest practices in accordance with applicable legislation, and ensure that overtime is exceptional, recorded, voluntary and paid in accordance with legal requirements.
- We ensure that wages, overtime, benefits and social entitlements are paid on time, regularly and in full; that deductions are made only on the basis of a legal requirement or written consent; and that payroll records are retained in a traceable manner.
- We perform age-verification checks during recruitment and implement the necessary controls to ensure that young workers, interns and apprentices are not assigned to night work, hazardous work or duties that may adversely affect their education or development.
- We strictly prohibit forced labour, human trafficking, bonded labour, illegal employment and any other form of involuntary work. We do not charge recruitment fees, deposits or guarantees to employees, and we do not confiscate identity documents, passports or personal records.
- We respect employees' freedom to leave employment, subject to reasonable notice periods, and expect employee rights to be protected in contractor, subcontractor and service-provider arrangements as well.

PROMAT Basım Yayın San. Ve Tic. A.Ş.

- We apply zero tolerance to harassment, mobbing, violence, threats, degrading treatment, physical or psychological pressure, and disciplinary practices that violate human dignity. Disciplinary processes are conducted in writing and in a fair, proportionate and documented manner.
- We support employees' rights to representation, to express their views and to submit suggestions and complaints; and we strengthen employee participation through employee representatives, committee and meeting mechanisms, and open communication channels.
- We ensure that ethics-line and grievance mechanisms are accessible, secure, confidential and protected against retaliation. We receive reports through appropriate channels, including etikhat@promat.com.tr, record them, assess them within a reasonable period and monitor the necessary corrective and preventive actions.
- We are committed to providing employees with safe and healthy work areas, clean drinking water, hygienic dining and rest areas, and the necessary personal protective equipment free of charge.
- We communicate the practices covered by this policy to employees, provide the necessary training, retain relevant records, monitor performance through internal audits and management reviews, and update our practices through a continuous-improvement approach.
- Company employees are required to comply with information-security principles while performing their duties and to protect company assets, trade secrets, confidential information and personal data. Employees act in accordance with applicable personal-data protection legislation and company policies, and process, share and retain personal data only within the scope of their authority and for defined purposes. Employees also perform their duties with impartiality, integrity and due regard for the company's interests; avoid any situation that may create an actual, potential or perceived conflict between their own interests, those of relatives or third parties, and the interests of the company; and immediately inform their manager and the relevant departments if such a situation arises. No conduct that compromises information security, violates the confidentiality of personal data or creates a conflict of interest is tolerated.

At Promat, we regard equality, respect for human rights, motivation, communication, business ethics, anti-bribery and anti-corruption, and social responsibility as fundamental principles across all our activities, and we are committed to ensuring that all employees and business partners embrace these principles.

**GENERAL MANAGER
TOLGA ÜRKMEZGİL**