

# **NORM Holding Human Resources Policy**

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## **NORM Holding Human Rights Policy**

### **1. Purpose**

- 1.1 The purpose of Norm Holding Human Rights Policy is to explain Norm Holding's respect for human rights and the value it attaches to its employees. It demonstrates a human rights-oriented relationship approach with all stakeholders by providing a contemporary and humane work environment.
- 1.2 Norm Holding Human Rights Policy is also an integral part of the Norm Holding Ethical Code of Conduct Operations Policy.
- 1.3 This policy is based on the Universal Declaration of Human Rights, United Nations (UN) Global Compact, UN Convention on the Rights of the Child, Fundamental ILO Conventions, OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights and national laws.

### **2. Scope**

- 2.1 Norm Holding Human Rights Policy is a guide that must be followed by the employees of all countries where Norm Holding and its companies operate as well as all persons, suppliers, business partners, institutions and organizations with whom they have a relationship with the supply of goods or services and their employees and all stakeholders with whom they have business relationship therein.
- 2.2 Norm Holding expects its suppliers and business partners to implement these principles, encourages them accordingly and wants them to adopt similar policies in their own business.

### **3. Fundamental Principles, Commitment and Implementation Principles**

- 3.1 Norm Holding carries out its operations respecting human rights in all workplaces where it operates on a global scale. In the countries in which it operates, it respects the rights recognised by law and avoids initiatives that may result in an offence or violation of rights, and ensures that its managers and employees work in the same direction.
- 3.2 Norm Holding treats all its employees honestly and fairly, avoids discrimination and undertakes the responsibility of providing a safe and healthy work environment that respects human dignity. It complies with human rights in the "relationships with its employees, suppliers, business partners and the communities in which it operates and encourages them to be sensitive accordingly.
- 3.3 It acts with due care to identify and prevent human rights risks regarding persons in its business and value chain. In the event that adverse human rights impacts arising out of or resulting from its business activities are identified, it undertakes to provide fair and reasonable remediation or to cooperate in remediation.

### **4. Diversity and Equal Recruitment Opportunities**

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4.1 Norm Holding endeavours to employ individuals from different cultures, experiences and backgrounds by considering equal opportunities. In the recruitment process, the job description of the position and the required qualifications ensure the design of the assessment process. There is equal opportunity among candidates and there is no discrimination based on language, race, nationality, colour, gender, disability, political opinion, philosophical belief, religion, or sect at any stage. Zero tolerance is shown against discrimination, and suitability for the job is sought as the only condition, recruitment, assignment and promotion are made on the basis of necessary qualifications and skills.

### **5. Prevention of Discrimination**

5.1 All processes are carried out without considering gender, religion, language, race, etc. and without any discrimination, and no kind of discrimination is tolerated with the zero-tolerance policy against discrimination. Norm Holding expects all its employees to act with the same diligence in their behaviours towards each other. All employees, suppliers and business partners are approached with the principle of equality.

### **6. Zero Tolerance against Child Labor and Forced Labor**

6.1 Child labor is prohibited at Norm Holding. In line with Labor Law, the minimum working age has been determined and is recorded with the necessary documents at the time of recruitment.

6.2 At the same time, forced labor, modern slavery and human trafficking, any form of exploitation or intimidation are prohibited. Working hours and periods are regulated as specified in the Labor Law. It is forbidden to confiscate or threaten employees' identity cards and other sensitive documents.

### **7. Freedom of Association and Collective Bargaining**

7.1. Norm Holding respects the right of its employees to join, form or not join a trade union without fear of retaliation, threat or harassment.

### **8. Health and Safety**

8.1 The safety of the working environment is one of the top priorities of Norm Holding. Norm Holding complies with applicable occupational health and safety laws, regulations and internal requirements to ensure a safe and healthy workplace. In the event that unsafe conditions or behaviours are detected in the work area, Norm Holding quickly takes the necessary measures to ensure the health, safety and security of its employees and customers.

8.2 Norm Holding undertakes to provide a workplace free of violence, harassment, threats and other unsafe or disturbing conditions arising from internal or external threats. Security services are provided in a manner that respects the privacy and dignity of each individual when necessary.

### **9. Zero Tolerance against Harassment and Violence**

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- 9.1 Norm Holding undertakes to provide a work environment where harassment and violence are not tolerated and a work environment free of safety-threatening or disturbing conditions, and does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse or threat.

### **10. Working Hours and Wages**

- 10.1 Norm Holding pays its employees fair and competitive wages in comparison to the sector and local labour market. All wages, including fringe benefits, are paid in accordance with applicable laws and regulations. All payments are recorded and periodic notifications are made in accordance with the regulations.
- 10.2 It complies with the applicable laws and obligations in determining the working hours and undertakes to pay the wage specified by law in case of overtime work.

### **11. Compliance Monitoring Audit and Reporting**

- 11.1 Norm Holding Code of Ethics and Related Policies have been approved and implemented by the Norm Holding Board of Directors. Policy responsibility rests with the CEO and the Board of Directors at the highest level.
- 11.2 The Board of Directors of the Company is responsible for the upper supervision of the determination and operation of notification, examination and penalty mechanisms in case of non-compliance with this Policy, rules and regulations.
- 11.3 Feedback on the Policy and potential Policy violations and non-compliance can be made to the e-mail address [normholding@etikhat.com.tr](mailto:normholding@etikhat.com.tr) and on phone at 4443845.
- 11.4 When using the Ethics Hotline channels, the notifier may clearly state his/her identity, as well as having the right to keep it confidential. In terms of the evaluation of the notification, whether the identity is disclosed or not, it does not have any negative impact on the functioning of the process. It is guaranteed by Norm Holding that employees report violations in confidence and that they are not subjected to hostile treatment due to their reports. Norm Holding undertakes that there will be no intervention/retaliation against persons who report violations or provide information in the investigation.
- 11.5 In the event that situations and inappropriate behaviours contrary to this Policy are detected, criminal sanctions may be imposed in accordance with the provisions of the relevant legislation in the countries of operation.

### **12. Enforcement and Implementation**

- 12.1 The Corporate Governance Committee, Human Resources and Norm Holding Executive Board are responsible for the execution of this regulation.
- 12.2 Norm Holding Human Rights Policy and subsequent amendments shall enter into force with the decision of the Board of Directors.