

## **TÜRKİYE PETROL RAFİNERİLERİ A.Ş. (“TÜPRAŞ”)**

### **HUMAN RIGHTS DUE DILIGENCE PROCESS**

As a globally acting group, Tüpraş takes the Universal Declaration of Human Rights (UDHR) as its guide and maintains a respectful understanding of Human Rights for its stakeholders in the countries where it operates. Regarding Human Rights, Tüpraş primarily considers “The United Nations Guiding Principles on Business and Human Rights”, “The United Nations Global Compact”, “ILO Declaration on Fundamental Principles and Rights at Work”, “The OECD Guidelines for Multinational Enterprises, “Women’s Empowerment Principles,” and “Worst Forms of Child Labor Convention.”

As Tüpraş, our main principle is to create and maintain a positive and professional working environment for our employees. We act in compliance with the global ethical principles in subjects such as recruitment, promotion, career development, wage, fringe benefits, and diversity; and we respect our employees’ rights to form and join organizations at their discretion. We adopt a zero-tolerance policy to forced labor, child labor and all forms of discrimination and harassment.

We expect our employees to comply with the Tüpraş Code of Ethics and Human Rights Policy. To maintain their compliance, we ensure that our employees complete online & classroom trainings on “Tüpraş Code of Ethics” and “Diversity, Equality, and Inclusion” and request their annual compliance undertakings. Additionally, we organize regular and diversified awareness-raising activities *i.e.* brochures, announcements, seminars. We expect our third parties to act in accordance with our principles as well and take all necessary steps to ensure this.

As Tüpraş, we systematically generate due diligence in human rights liaising with all business units to analyze potential risks and their impacts. In this regard, the following headings are assessed.

- Policies and Procedures,
- Awareness and Workplace Practices,
- Ethic Reports,
- Third Party Risks,
- Investigations and Discipline Practices,
- Personal Development and Performance,
- Promotion Process,
- Freedom Of Association,
- Political Activities,
- Data Privacy,
- Discrimination,
- Environmental Responsibility,
- Employment Equality,
- Efficient Work/Life Balance,
- Equal Remuneration,
- Preventing Harassment and Violence,

- Health And Safety Practices,
- The principle of not Employing Child Labor
- Prevention of Forced Labor,
- Contract Management,
- Audit Processes,
- Training and Equal Opportunities for Employees.

Tüpraş conducted a human rights due diligence in 2024 with the participation of all business units in coordination of Compliance team to identify human rights risks of Tüpraş. In this regard, regulations and company policies were reviewed, questionnaires were prepared, workshops and one-to-one meetings were organized.

In below company’s risk control matrix, main risks were detailed, and risks mitigation plans were generated.

No	Findings	Details	Risk Mitigation Plans
1	Audit Process	Human rights violation risks of third parties	Inclusion of auditing right in the third-party contracts and performance of risk-based audits to third parties
2	Awareness and Workplace Practices	Lack of awareness on mobbing, harassment and psychological violence notions among employees	Increasing and repeating awareness activities on human rights, mobbing and bullying and emphasizing Company’s zero tolerance strategy against them
3	Discrimination	Non-standard medical evaluations in recruitment and promotion of disabled employees	Standardization of medical evaluations on disabled employees
4	Promotion Process	Missing information in job description documents	Completion of partial deficiencies in job description documents of the relevant departments

### Grievance & Remediation Mechanism

Tüpraş attributes great importance to be fully compliant with applicable legislation, performs its activities with integrity and according to the highest ethical standards, and supports “open communication” and “accountability” culture to prevent unethical or illegal actions and violations of human rights.

In case of any violation of human rights and/or unethical conduct, our employees can report to their line manager, Internal Audit Department, or Chief Legal and Compliance Office at Tüpraş. Alternatively, they can report the incident to the Tüpraş Stakeholder Communication Management system through <https://www.tupras.com.tr/iletisim> or Tüpraş’s Ethics Hotline via [koc.com.tr/hotline](https://www.tupras.com.tr/hotline) with the option of anonymous reporting. All reports communicated through the Hotline and other alternative channels are evaluated and investigated by Tüpraş Internal

Audit Department or Chief Legal and Compliance Department according to their subjects. Investigations are conducted confidentially, objectively and in an understanding of zero toleration for retaliation.

As stated in our Human Rights Policy, violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated with immediate action.