

## TURKCELL HUMAN RIGHTS POLICY

As Turkcell, we intend to unite our country and our people with state-of-the-art technologies, to contribute to the nation's digital transformation and to create value for every moment of our customers' lives through our innovative and value-added services and solutions.

We consider it our priority to create a working environment and an ecosystem which contributes to ensuring economic, social and environmental sustainability through a strong human focus and ethical values in all technology we develop, in every service we offer, and in every step we take.

On this basis, in relations we establish with our employees, customers, business partners and all our stakeholders, we commit to complying with the following principles, and doing our part in order to ensure the sincere commitment of our organization to these principles with devotion to the fundamental rights and freedoms guaranteed by

- The Constitution of the Republic of Turkey,
- The Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights, The International Covenant on Economic, Social and Cultural Rights, The Convention on the Rights of Persons with Disabilities and The Convention on the Rights of the Child,
- The ILO Conventions to which our country is a party,
- The United Nations Business and Human Rights Principles,
- The Ten Principles of the United Nations Global Compact ,
- The OECD Guidelines for Multinational Enterprises

and establishing compliance with the national legislation on working life and the national and international capital markets regulations to which we are subject.

### I. OUR PRINCIPLES

1. **The child labor**, which is described as dangerous and harmful work for children in terms of mental, physical, social or moral aspects, is forbidden either in Turkcell's own business processes or in its supply chain. Turkcell takes all possible measures for compliance with international regulations and national legislation, as reflected in our internal law regarding the prevention of child labor, and/or to which our Company is subject.
2. Only those who wish to work for us of their own free will are employed at Turkcell. No form of modern slavery, such as **human trafficking, involuntary labor and forced labor**, is acceptable within Turkcell and its ecosystem.
3. Turkcell is aware that its employees constitute the basis of its success. Accordingly, for the purpose of creating a working environment befitting human dignity and value;
  - No discrimination in terms of gender, religion, language, race, ethnic origin, physical appearance, and disability is made among the employees in the decisions taken on recruitment, promotion, development and similar matters.

- All kinds of discrimination and harassment which may take place against or between the employees are opposed, and no compromise is made on these issues in any way whatsoever.
- The "Right and Freedom to Assemble" and the "Right to Establish and Engage in Union Activities" of our employees, as also expressed in the Constitution of the Republic of Turkey, are respected.
- Modern working environments are provided, especially in terms of ensuring occupational health and safety.
- Legal working hours are respected and the balance between work and private life is maintained and encouraged.
- Measures are taken against all kinds of violence in the workplace, or domestic violence, with adequate and clear regulations on this issue included in our policies and procedures, which constitute the basis of our corporate management.
- Initiatives are taken to increase work efficiency, digitizing business processes, facilitating life in the workplace and access to business tools, finding quick solutions to technical and administrative problems, providing employees with fringe benefits, and measuring performance objectively; in short, ensuring employee well-being and welfare. Necessary studies are carried out in order to ensure the accessibility of our platforms to our disabled employees.

Our suppliers and business partners are also encouraged to adopt and implement these principles, which we have adopted in connection with our own employees.

4. Turkcell refrains from the procurement of products containing cassiterite (tin), columbite-tantalite (tantalum), wolframite (tungsten) or gold and its derivatives, which are known as "conflict minerals" and extracted in certain specific countries, during its procurement processes pursuant to the capital market legislation by which it is bound. In order to ensure this, Turkcell regularly conducts a reasonable level of country-of-origin research. Turkcell, *inter alia*, is attentive to conduct background reviews on transactions considered to be risky or suspicious in order to avoid provision/procurement processes associated with human rights violations.
5. Turkcell fulfills its obligations in order to ensure that its employees and customers can exercise their right of privacy and freedom of expression in accordance with the law under existing national and international legislation and principles, and also designs and implements processes ensuring the protection of personal data.
6. Turkcell considers children the inheritors of the future, and in this sense, makes all reasonable efforts to protect children's rights, insure their online safety and ensure that the products and services it offers are in the best interest of children.
7. Turkcell exercises due care for the ethical and responsible development and use of the technologies that it uses in, and shall develop for business processes. It aspires to act by contributing to the UN Sustainable Development Goals, and to create a more viable world based upon human dignity, fundamental rights and freedoms through the technologies it develops, as artificial intelligence being in the first place.

## II. GOVERNANCE OF POLICY

In order to ensure that this Policy is implemented effectively and in accordance with its intended-purpose, Turkcell;

- a. endeavors to ensure that the principles included in the policy are adopted in its business processes, and also by its management and employees;
- b. forms practices and procedures intended for the implementation of policy, performance of training and awareness activities related thereto, and the determination of governance processes in detail, and monitors compliance with the Policy and the procedures issued based thereon by virtue of especially **the Sustainability Committee; The Integrated Value Creation Committee** and all the other related Committees and Boards.
- c. sensitively reviews the applications to be made in connection with non-compliance regarding the principles contained in this Policy;
- d. in case of possible violations, escalates the issue to the relevant internal units depending on the subject of the violation, establishes the necessary transactions within the framework of internal procedures and rules as well as implements the designated processes;
- e. in case of any violation by employees, the processes specified in Turkcell Common Values and Business Ethics Rules are implemented and the violation notification is brought to the agenda of the Ethics Committee. The violation committed by employees may result in disciplinary action or other sanctions in accordance with the decision of the Ethics Committee.

## III. REQUEST OF INFORMATION RELATED TO TURKCELL HUMAN RIGHTS POLICY

Applications in connection with Turkcell Human Rights Policy, or the human rights processes at Turkcell can be communicated through:

- e-mail to [insanhaklari@turkcell.com.tr](mailto:insanhaklari@turkcell.com.tr) or [humanrights@turkcell.com.tr](mailto:humanrights@turkcell.com.tr)
- written application to the address Turkcell İletişim Hizmetleri A.Ş. Aydınevler Mahallesi İnönü Caddesi No:20/B Küçükyalı Maltepe İstanbul.