

HUMAN RIGHTS POLICY

1. PURPOSE

1.1. The Human Rights Policy (the “Policy”) sets forth the human rights rules and principles adopted and implemented by Doğuş Construction and Trade Inc. (the “Company”) while conducting its activities in line with the principles defined in the Code of Ethics Procedure, and demonstrates the Company’s responsibility to protect human rights, respect human rights, and develop effective remediation mechanisms against human rights violations in all areas in which it operates.

1.2. Within this scope, the Company adopts as a fundamental principle the protection of human rights, respect for these rights, and the assumption of responsibility for the prevention and remediation of human rights violations in the conduct of the activities of Employees and Business Partners affected by its operations.

1.3. This Policy has been prepared based on the Universal Declaration of Human Rights, the United Nations Global Compact (UNGC), the United Nations Convention on the Rights of the Child, the Fundamental International Labour Organization (ILO) Conventions, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, and local regulations.

ARTICLE 2. DEFINITIONS

In this section, the specific terms and concepts used in the Policy are briefly explained as follows.

In addition to the definitions provided below, the other definitions included in the Company’s Code of Ethics Procedure shall also be deemed valid with respect to the terms used in this Policy.

• Human Rights

Refers to the rights inherent to all human beings regardless of language, religion, race, color, gender, political opinion, trade union membership, belief, age, physical disability, sexual orientation, military service status, or any other status. Human rights include, among others, freedom of thought and expression, the right to life and liberty, the right to work and education, the right to housing, the right to benefit from healthcare services, and protection from slavery and torture.

• Vulnerable Group

Refers to groups that face a higher risk than other groups of being subject to discriminatory practices, violence, natural and environmental disasters, or economic hardships.

ARTICLE 3. APPLICABLE LEGISLATION

The Company undertakes to fulfill its responsibility regarding human rights and labor standards in accordance with the Constitution of the Republic of Türkiye in force, the international agreements to which Türkiye is a party, other national legislation, and universally accepted international human rights norms and principles.

Within this scope, the Company is guided primarily by the United Nations Guiding Principles on Business and Human Rights, as well as the United Nations Universal Declaration of Human Rights, the Core Conventions of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, and other relevant international standards.

Accordingly, the Company:

- Adopts respect for human rights as a corporate commitment,
- Operates the necessary processes to prevent human rights violations, identify potential and actual risks, and mitigate such risks,
- Adopts the principle of providing remedy within a reasonable time through accessible, transparent, and effective remediation mechanisms in the event that a human rights violation or risk of violation is identified.

It is accepted that the concept of human rights also encompasses the prevention of discrimination, gender equality, prohibition of forced labor and child labor, fair, safe and healthy working conditions, occupational health and safety, environmental protection, information security and personal data protection, and social impacts on society.

The Company ensures the implementation and monitoring of this Policy through relevant internal audit mechanisms.

ARTICLE 4. SCOPE

4.1. This Policy covers:

- a) Members of the Company's Board of Directors,
- b) Company Employees,
- c) Business Partners.

4.2. This Policy applies to human rights impacts arising from the Company's direct activities, business relationships, and supply chain, where the Company causes, contributes to, or is directly linked to such impacts.

4.3. The Company ensures the direct implementation of the provisions of this Policy with respect to persons and entities under its control; with respect to Business Partners that are not under its direct control but are within its sphere of influence, it encourages respect for human rights and aims to take the necessary preventive and corrective actions accordingly.

4.4. The provisions of this Policy shall apply without prejudice to the provisions of local legislation in the countries where activities are carried out. In the event of any discrepancy between local legislation and the provisions of this Policy, the objective shall be to apply the standards that provide the higher level of protection for human rights.

ARTICLE 5. GENERAL PRINCIPLES AND FUNDAMENTALS

In line with the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, and the conventions of the International Labour Organization (ILO), the Company accepts as a corporate commitment the respect for universal human rights, ensuring that such rights are not violated, and providing remedies in the event of potential violations.

Within this scope, the Company adopts the following fundamental principles and standards throughout its operations, business relationships, and supply chain.

5.1. Commitment to Respect Human Rights

5.1.1. The Company adopts respect for universal human rights as a fundamental principle in all its activities, business relationships, and throughout its supply chain. This commitment covers human rights impacts that the Company causes, contributes to, or is directly linked to.

5.1.2. The Company demonstrates an approach that respects human dignity in its activities and expects the same understanding to be adopted in its business relationships.

5.2. Prevention of Discrimination and Equal Treatment

5.2.1. The Company promotes a creative, culturally diverse, and collaborative working environment in which the rights of all Employees are respected at all times. On this basis, it adopts a zero-tolerance approach toward discrimination and retaliation on the grounds of age, gender, race, color, language, religion, sect, ethnic origin, political opinion, trade union membership, marital status, disability, health status, sexual orientation, physical appearance, lifestyle, or any similar reason.

5.2.2. All processes related to recruitment, promotion, remuneration, training, career development, performance evaluation, and social benefits are conducted solely on the basis of qualifications, performance, experience, and competence.

5.3. Diversity, Equity and Inclusion

The Company aims to create a working environment in which differences are valued and everyone feels safe and included. The principles of diversity, equity, and inclusion are observed in internal and external communications, human resources practices, and corporate decision-making processes.

5.4. Prevention of Violence, Harassment and Ill-Treatment

5.4.1. Harassment refers to any verbal, written, physical, or visual behavior that includes humiliation, degradation, assault and/or insult relating to a person's language, religion, race, color, gender, political opinion, trade union membership, belief, age, physical disability, sexual orientation, military service status, or personal characteristics, and which causes unease and discomfort to the other party.

5.4.2. One of the most important ways of protecting the personal dignity of Employees is to ensure that no form of harassment or violence occurs in the workplace or to take the necessary measures to prevent such incidents. However, if such an incident occurs, appropriate sanctions shall be applied in accordance with a zero-tolerance approach.

5.4.3. The Company adopts the principle that security services provided within its organization or through third parties shall be carried out in a manner that respects human rights, complies with the law, and observes the principle of proportionality with respect to all persons coming into contact with its areas of operation. In security practices, the use of force shall only be exercised in accordance with applicable legislation, where necessary and in a proportionate manner; respect for human dignity and physical and psychological integrity, as well as zero tolerance for ill-treatment, are fundamental principles.

5.4.4. Therefore, our Company does not tolerate any form of physical, verbal, sexual, or psychological harassment, racism, bullying, abuse, or threats and prefers to work with Business Partners that adopt policies similar to those of our Company.

5.4.5. Employees are responsible for reporting such behavior through established reporting mechanisms if they are subjected to or witness it.

5.4.6. Reports submitted within this scope are handled confidentially, and necessary investigations and sanctions regarding violations are implemented within the scope of the Code of Ethics Procedure.

5.5. Child Labor and Forced Labor

5.5.1. Children's right to education is sacred. The Company strongly opposes child labor that may cause physical, psychological, material, or moral harm to children and deprive them of their right to education.

5.5.2. Furthermore, our Company does not permit any form of forced or compulsory labor, in accordance with ILO conventions and recommendations, the Universal Declaration of Human Rights, and the United Nations Global Compact, and is opposed to slavery and human trafficking.

5.5.3. Within this scope, the Company applies risk-based audit and assessment mechanisms for the purpose of identifying, preventing, and monitoring human rights risks; it regularly reviews risks relating to child labor and forced labor in its areas of activity. Corrective and preventive measures are taken in response to identified violations or risks of violation; where necessary, appropriate actions are implemented, including the review of business relationships.

5.6. Protection of Vulnerable Groups

5.6.1. The Company respects the rights of Vulnerable Groups (indigenous peoples, women, national or ethnic, religious and linguistic minorities, children, persons with disabilities, migrant workers and their families) as detailed in the United Nations Guiding Principles on Business and Human Rights. Where required by applicable legislation, it conducts environmental and social impact assessments to minimize the impacts of its operational areas on local communities.

5.6.2. The Company maintains continuous communication with local communities within the framework of community engagement and dialogue and follows the practices required under legislation to minimize the adverse impacts of its operational areas on local populations.

5.6.3. If actual or potential violations affecting Vulnerable Groups are identified as a result of the Company's activities, preventive and corrective measures are taken; where necessary, relevant business processes and business relationships are reviewed.

5.7. Gender Equality

The Company considers it a fundamental human right that all Employees, especially women and men, persons involved in business relationships, and communities affected by its activities have equal rights, opportunities, and treatment.

Within this scope, the Company:

- Does not permit any discrimination based on gender in recruitment, remuneration, career development, promotion, training, performance evaluation, and social benefits,
- Observes the principle of equal pay for equal work,
- Does not tolerate any form of gender-based violence, harassment, or intimidation in the workplace,
- Implements monitoring and evaluation processes to identify risks related to ensuring gender equality.

5.8. Personal Development

5.8.1. Our Company places importance on employing talented Employees and supporting their professional and personal development. Our Company provides Employees with opportunities and resources to develop their talents and potential.

5.8.2. Our Company, which regards human capital as a valuable resource, provides career counseling to Employees and supports them through training, striving for their comprehensive personal and career development, and aims for the long-term employment of high-potential and talented Employees.

5.9. Respect for Freedom of Association and Collective Bargaining Rights

The Company undertakes to fully respect and safeguard employees' rights to establish trade unions, freely join or choose not to join trade unions, and engage in collective bargaining.

Within this scope, employees have the right, without the requirement to obtain prior authorization and without fear of pressure, discrimination, retaliation, or any adverse treatment, to establish and join trade unions or employee representative organizations of their own choosing.

The Company undertakes not to interfere, directly or indirectly, in any way with the establishment, activities, administration, or operation of trade unions or employee representative organizations and not to engage in discrimination, pressure, intimidation, or obstructive practices against employees due to trade union activities.

The Company agrees to conduct collective bargaining in good faith with duly authorized employee representatives and strictly prohibits any practices that obstruct the exercise of trade union rights.

5.10. Appropriate and Decent Working Conditions

5.10.1. The Company determines working hours in accordance with the applicable legislation and regulations in force in all countries in which it operates and adopts as a fundamental principle the provision of decent, fair, and balanced working conditions. Within this scope, importance is attached to enabling Employees to establish a balanced work and private life and to effectively exercise their rights to regular breaks and leave.

5.10.2. The Company carries out practices regarding wages, fringe benefits, working hours, overtime, and leave fairly and transparently within the framework of applicable legislation, collective bargaining agreements where applicable, and industry practices. The principle of equal pay for equal work is observed, and Employees' career development and advancement opportunities are evaluated solely on the basis of competence, performance, and experience.

5.10.3. Practices relating to working conditions are reviewed regularly, and improvement initiatives aimed at increasing Employees' well-being and productivity are implemented.

5.11. Ensuring Employee Health and Safety

5.11.1. The Company recognizes the right to life, physical integrity, and safety of Employees, third parties present within workplace boundaries, and all stakeholders affected by its activities as one of the most important human rights issues.

5.11.2. Accordingly, the Company adopts a proactive and risk-based approach aimed at preventing occupational health and safety risks and reducing accidents and occupational diseases in compliance with applicable legislation and standards. Occupational health and safety practices are carried out with a continuous improvement approach.

5.11.3. Employees' participation in the Occupational Health and Safety training required for a safe and healthy working environment is ensured; while implementing safety measures, individuals' dignity, privacy, and reputation are respected. Employees are obliged to report hazards and risks identified in the workplace, and the Company immediately takes preventive and corrective measures regarding the reported issues.

5.11.4. The Company implements without delay all measures necessary to protect occupational health and safety in response to unsafe conditions or behaviors identified in work areas.

5.12. Freedom of Expression

The Company provides the necessary environment for Employees to exercise their right to freedom of expression and to express themselves freely in the workplace.

5.13. Participation in Political Activities

Our Company respects all lawful and voluntary political participation by Employees. Employees of our Company may voluntarily participate in political activities outside working hours and may make personal donations to a political party or candidate. Employees shall not be pressured to support any political party. However, Employees must conduct political activities outside working hours and avoid using any Company resources (e-mail, vehicles, computers, telephones, etc.) for political activities.

5.14. Protection of Privacy and Workplace Privacy

5.14.1. The Company recognizes respect for the private lives, personal data, and privacy of Employees and Business Partners as a fundamental human right and corporate responsibility.

5.14.2. Within this scope, the Company adopts the principle that personal data, trade secrets, and confidential information are processed lawfully, fairly, and transparently in accordance with legislative provisions; used only for specified, explicit, and legitimate purposes; and retained only for as long as necessary. All activities relating to the processing of personal data are carried out in accordance with applicable legislation and data protection and human rights standards.

5.14.3. The Company conducts data protection and privacy practices in accordance with the legislation in force in the country where activities and construction sites are located. The data protection processes to be implemented at each construction site and operational area are determined considering the legal regulations of the relevant country and the practices of competent data protection authorities.

5.14.4. The protection of privacy in working life is ensured in all business processes, including camera systems, access controls, information technology infrastructure, electronic communication tools, and similar applications, by observing the principles of necessity and proportionality. No disproportionate interference is made with Employees' personal space and human dignity; such practices are carried out only for legitimate purposes and in accordance with legislation.

5.14.5. The Company applies risk-based audit and monitoring mechanisms to ensure the effectiveness of practices relating to the protection of personal data and confidential information. Data processing activities, access authorizations, monitoring and security practices, and the use of information systems are subject to periodic internal audits and reviews. Corrective and preventive measures are taken in response to identified non-conformities, risks of violations, or violations; where necessary, relevant processes and practices are reviewed.

5.14.6. The Company carries out information and/or training activities aimed at increasing Employees' awareness in order to reduce risks in the areas of privacy and data protection.

5.15. Climate Justice and Management of Environmental Impacts

5.15.1. The Company acknowledges that environmental and climate-related impacts may create direct and indirect effects on human rights, particularly the right to life, the right to health, and the right to live in a safe and healthy environment. Within this framework, the Company addresses environmental and climate issues as an integral part of its human rights responsibilities.

5.15.2. The Company takes into account the potential adverse consequences of environmental and climate impacts arising from its activities, particularly on vulnerable and fragile groups and local communities where activities are conducted, and aims to take preventive, monitoring, and remedial measures to prevent and reduce such impacts.

5.15.3. Within this scope, the Company applies risk-based assessment processes to identify environmental risks and climate-related human rights impacts and adopts an integrated approach between environmental, occupational health and safety, and human rights practices.

5.15.4. The Company conducts its environmental and climate-related practices in accordance with applicable legislation and standards and seeks to communicate with communities affected by its activities within the framework of transparency and dialogue principles.

5.15.5. Corrective and preventive measures are determined in response to identified non-conformities, adverse impacts, or risks; where deemed necessary, relevant business processes and practices are reviewed.

5.16. Sharing Best Practices and International Cooperation

The Company follows best practices and integrates these practices into its own processes. The Company may cooperate with relevant organizations to develop its human rights policies. Such collaborations contribute to continuous improvement and the achievement of high standards by incorporating global standards and best practices into internal Company processes.

ARTICLE 6. DUTIES AND RESPONSIBILITIES

6.1. Board of Directors

The Board of Directors is responsible for ensuring high-level oversight of the implementation of this Human Rights Policy and for regularly evaluating the effectiveness of the Policy. In addition, it is responsible for overseeing the effective functioning of the Compliance Manager, Ethics Disciplinary Committee, and Internal Audit Department regarding notification, investigation, and sanction mechanisms in cases of violations and suspicious situations contrary to the principles and standards set forth in the Policy. Furthermore, the

Board of Directors is responsible for maintaining the Holding's high-level commitment to human rights, including the Board Commitment Statement ("YKK Commitment Statement") to be issued under the Code of Ethics Procedure.

6.2. General Manager

The General Manager is responsible for:

- The overall supervision of the establishment, implementation, and updating of the Policy,
- Following up on the necessary actions and procedures as a member of the Ethics Disciplinary Committee under the Code of Ethics Procedure,
- Following up on actions and procedures requiring the approval of the General Manager under the provisions of this Policy and the Code of Ethics Procedure.

6.3. Compliance Manager

A Compliance Manager has been appointed by Doğuş Construction to manage, supervise, and ensure the implementation of the rules defined in the Code of Ethics Procedure. The duties and authorities of the Compliance Manager are explained in the Code of Ethics Procedure.

6.4. Ethics Disciplinary Committee

The Ethics Disciplinary Committee consists of the General Manager, the Deputy General Manager responsible for the Human Resources Department, and the Legal Counsel and is authorized to conduct investigations within the framework of the Labor Law and applicable legislation regarding violations of the Employees' Code of Conduct.

The Committee is responsible for establishing and operating effective and accessible communication channels for reporting violations and suspicious situations contrary to the principles and standards contained in this Human Rights Policy and for taking all necessary measures to ensure the confidentiality and security of reporting persons and to ensure that no retaliation is permitted against persons making reports in good faith.

The Ethics Disciplinary Committee evaluates reports submitted to it within the framework of the principles of impartiality and confidentiality, refers them to relevant units where necessary, and ensures that appropriate preventive or corrective actions are taken.

6.5. Human Resources Department

The Human Resources Department is responsible for implementing the provisions set forth in the Policy within business processes and for carrying out activities to increase awareness within the organization.

7. ETHICS HOTLINE

Violations and suspicious situations contrary to the principles and standards set forth in this Policy shall be reported through the Ethics Line to the Compliance Manager in accordance with the Whistleblowing Policy regulated under the Code of Ethics Procedure.

Provided that reporting persons do not make reports in bad faith, measures are taken to ensure that no pressure or retaliation is applied against the reporting person, and violation reports are investigated within the framework of confidentiality principles. If, as a result of the investigation, a situation contrary to the principles and standards contained in the Policy is identified, sanctions may be imposed on the responsible person(s) by the Ethics Disciplinary Committee in accordance with the principle of equality.

PLEASE TALK TO US! WE ARE READY TO LISTEN TO YOU.

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8. EFFECTIVENESS

This Policy was approved and entered into force by the resolution of the Company's Board of Directors dated **02/04/2026** and numbered **2026/59**. It shall remain valid and in force until a new announcement is made.

9. IMPLEMENTATION, MONITORING AND REVIEW

The Policy is regularly updated in light of stakeholder opinions and developments in national/international standards.

10. RELATED POLICIES AND PROCEDURES

- Code of Ethics Procedure
- DEI Policy
- Sustainability Policy
- Human Resources Policy
- Occupational Health and Safety Policy