



# CORPORATE SOCIAL RESPONSIBILITY POLICY

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## Human

At Demirer Kablo, we acknowledge innate value, dignity and equal rights of every person. This principle guides our interaction with people including our employees and employees of our customers, suppliers and competitors.

### **Human Rights and Labour**

We believe that all workers deserve fair work environment and working conditions compatible with human dignity and we take measures to prevent violation of this principle within our supply chain.

### **Prohibition of Slavery, Human Trafficking and Forced Labour**

Employment of anybody without his or her consent, or support of such action in our company or supply chain, is not acceptable under any circumstances. Furthermore, no tolerance is shown for any action which may be interpreted as direct or indirect support to slavery or human trafficking. In order to prevent violation of international and national legislation regarding slavery and human trafficking, especially United Kingdom “Modern Slavery Act 2015” in our company and supply chain, this issue is specially audited in internal audits and supplier audits.

### **Prohibition of Child Labour**

Employment of children in our company or supplier chain, violating ILO C138- Minimum Age Convention, 1973 (No. 138) is not acceptable under any circumstances.

### **Prevention of Abuse, Harassment and Inhuman Treatment**

Our company and all employers in our supply chain are responsible for prevention of abuse, harassment and inhuman treatment in their work environments. No employee shall be abused, harassed or treated inhumanly or threatened with any of those in any way, shape or form .

No tasks and responsibilities shall be given to any employee that will jeopardise his or her physical or mental health or harm his or her dignity.

### **Prevention of Discrimination**

Discrimination against anyone in any way, shape or form during recruitment or employment in our company or supply chain is not acceptable. Criteria at recruitment and career development are one's conformity to nature of business and performance based on objective criteria.

Our company and any employer in our supply chain shall not force or prevent any employee to disclose his or her personal information, beliefs or opinions, except to the extent required by law.

### **Working Hours**

Having any employee work more than the working hours specified in the national legislation in our company or supply chain is not acceptable under any circumstances. Weekly ordinary working hours shall not exceed 45 hours. Every employee shall have minimum one day off.

### **Pay and Benefits**

Having any employee work for lower pay and benefits than the ones specified in the national legislation in our company or supply chain is not acceptable under any circumstances. Employers are obliged to allow all compensated leaves and provide overtime payments regulated by national legislation. Forfeiture of pay punishment shall not be practiced.

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

We respect freedom of association and collective bargaining of all employees. Prevention of enjoyment of this right or inhuman or discriminatory treatment due to enjoyment of this right in our company or supply chain is not acceptable.

### **Communication Channel**

We ensure existence of appropriate channels for employees in our company and supply chain to report violations of rights they consider they are suffered from, breaches of law and their complaints and we support them to feedback.

### **Occupational Health and Safety**

We believe that human is the most important value and protection of physical and mental health of every person is the primary priority. In this direction, we refrain from any actions jeopardising health and safety of persons we interact with and we take measures to prevent accidents and ill-health.

### **Accident Prevention**

We define and assess the hazards and manage them with appropriate controls. We provide protective equipment and their correct use methods to relevant persons where necessary. Any

actions jeopardising human health and safety or not taking appropriate measures even if health and safety is not jeopardised, within our supply chain is not acceptable.

### **Emergencies**

We define and assess emergencies, plan the response and act accordingly when an emergency occurs. Existence of vulnerabilities that emergencies are not defined or response is not planned within our supply chain is not acceptable.

### **Occupational Health and Safety Management**

We apply an appropriate management system for managing accidents, risks, emergencies and corrective actions. Existence of a supplier in our supply chain not having an appropriate occupational health and safety management system is not acceptable.

## Environment

At Demirer Kablo, we are aware of the value of environment and our responsibility towards it. In this direction, protection of natural resources, their effective and efficient use, minimizing and appropriately disposing wastes are among our primary priorities in all our activities.

### Prevention of Pollution

Within the frame of legislation that we are obliged to abide by, we do not use prohibited substances and we do not discharge any uncontrolled pollutant or waste. Use of prohibited substances and disposal of pollutants or wastes without control or exceeding legal boundaries within our supply chain is not acceptable.

### Environmental Management

We apply an appropriate management system for managing nonconformities regarding environmental management, risks, emergencies and corrective actions. Existence of a supplier in our supply chain not having an appropriate environmental management system is not acceptable.

## Code of Ethics

At Demirer Kablo, we aim conducting business with the highest ethical standards.

### **Honesty**

Demirer Kablo upholds unconditional honesty, fairness and moderation in all its activities. No tolerance is shown to corruption, bribery, fraud, extortion or any unjustified benefit within our company or supply chain under any circumstances and in any way, shape or form.

### **Confidentiality**

We protect confidential information of all persons and institutions that we interact with. No tolerance is shown to any actions in our company or supply chain, jeopardising confidentiality of third parties. Only in the case that legislation obligates, such information can be shared with courts.

### **Intellectual Property Rights**

We protect Intellectual Property Rights. Unauthorised use of intellectual property in our company or supply chain is not acceptable.