

Human Rights, Labour and Modern Slavery Policy

Soysal International İç ve Dış Ticaret Limited Şirketi

Version	1.0 (October 2026)
Approved by	Emrullah Soysal, CEO
Effective date	5 October 2026
Policy owner	CEO
Review	Annually
Applies to	The Company, its employees and job applicants; suppliers, subcontractors and labour providers through the Supplier Code of Conduct (05)

1. Commitment

Soysal International respects internationally recognised human rights as set out in the **UN Universal Declaration of Human Rights**, the **UN Guiding Principles on Business and Human Rights** and the **ILO Declaration on Fundamental Principles and Rights at Work**. We comply with Turkish Labour Law No. 4857, Occupational Health and Safety Law No. 6331 and Social Security Law No. 5510. Where international standards are stricter than local law, we apply the stricter standard.

2. Our standards

- 1. No forced, bonded, prison or trafficked labour.** Work is voluntary. Workers are free to resign with legal notice. Nobody keeps workers' passports or identity documents, and nobody charges workers recruitment fees.
- 2. No child labour.** The minimum age for employment is 18 at Soysal International. We never employ anyone under 15 in any role, or anyone under 18 in hazardous work, and we expect the same from suppliers.
- 3. Equal opportunity and non-discrimination.** Decisions on hiring, pay, training, promotion and dismissal are based on skills and performance only. We do not discriminate on the grounds listed in our Code of Conduct (01, §7), and we make reasonable adjustments for people with disabilities.
- 4. Dignity and respect.** Harassment, intimidation, coercion and abusive behaviour are prohibited.
- 5. Fair wages and working time.** We pay at least the legal minimum wage, on time, into the worker's own bank account, with a pay slip. Working hours, overtime and rest follow Law No. 4857 (maximum 45 regular hours per week; overtime voluntary and paid at the legal premium).
- 6. Written contracts.** Every worker receives a written employment contract in a language they understand, stating role, wage, working hours, leave and notice terms, **before** they start work.
- 7. Right to work and age checks.** Before anyone starts work, we check their identity documents, age and legal right to work in Türkiye, and register them with the Social Security Institution (SGK). Copies are kept on the personnel file.
- 8. Freedom of association.** Workers may join or not join a trade union and bargain collectively, as provided by Law No. 6356, without retaliation.
- 9. Health, safety and wellbeing.** See Policy 07.

10. **Privacy.** Personal data of workers is processed only as permitted by KVKK (Law No. 6698).

3. Modern slavery and human trafficking

- **Prohibition.** Slavery, servitude, forced or compulsory labour and human trafficking are prohibited in our operations and supply chain.
- **Risk assessment.** We assess modern slavery risk by product category and source country as part of supplier onboarding (Policy 06). Higher-risk categories (for example textiles and workwear, PPE, agricultural products, raw materials, and labour-intensive manufacturing) receive enhanced due diligence.
- **Supplier requirements.** Suppliers, subcontractors and labour providers must accept the Supplier Code of Conduct (05), which contains these same standards, and must apply them to their own suppliers.
- **If modern slavery is suspected or found:**
 1. Report immediately to the CEO (or through the Speak-Up Procedure, 09).
 2. The CEO opens an investigation within 5 working days and records it.
 3. If workers are at risk, contact the relevant authorities (in Türkiye, the police / gendarmerie and the Ministry of Labour) and put the safety of the people affected first.
 4. Require the supplier to agree a remediation plan with deadlines (including repayment of any recruitment fees charged to workers); suspend new orders until it is agreed.
 5. Terminate the relationship if the supplier refuses to remediate or the abuse is severe.
 6. Record the case and the lessons learned in the annual policy review.

4. Supply chain improvement

We help suppliers to improve: we share our Supplier Code, explain our expectations when we first work together, and give feedback after assessments. Where gaps are found, we agree corrective actions with deadlines and follow them up (Policy 06, §6).

5. Training

All employees receive training on human rights, modern slavery, equal opportunities and preventing discrimination and harassment **when they join and every year**, as part of the annual ethics and compliance training. When we use subcontractors on site or for services, we brief them on these standards before work starts and record the briefing.

6. Grievances and speaking up

Workers, suppliers' workers and anyone else may raise concerns confidentially, and anonymously if they wish, through the **Speak-Up Procedure (09)**. We do not tolerate retaliation.

7. Monitoring and review

The CEO reviews working practices **at least once a year**: contracts, pay, working hours, leave, training records and any grievances. The review checks for decent working conditions, fair wages and limits on working time. The findings feed the annual review of this policy.

Approved by Emrullah Soysal, Chief Executive Officer, on 5 October 2026. A signed copy is held by the Company.